

**U.S. PRODUCERS' QUESTIONNAIRE**

**LIGHT-WALLED RECTANGULAR (LWR) PIPE AND TUBE  
FROM CHINA, KOREA, MEXICO, AND TURKEY**

**This questionnaire must be received by the Commission by no later than February 19, 2008**

*See the Instruction Booklet 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 (CVD) investigation concerning light-walled rectangular (LWR) pipe and tube from China (Inv. No. 701-TA-449 (Final)) and its antidumping (AD) investigations concerning LWR pipe and tube from China, Korea, Mexico, and Turkey (Inv. Nos. 731-TA-1118-1121 (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)).

<b>Name of firm</b> _____
<b>Address</b> _____
<b>City</b> _____ <b>State</b> _____ <b>Zip Code</b> _____
<b>World Wide Web address</b> _____
Has your firm produced LWR pipe and tube (as defined in the instruction booklet) at any time since January 1, 2005?
<input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> <b>YES</b> (Read the instruction booklet carefully, complete all parts of the questionnaire, and return the entire questionnaire to the Commission so as to be received by the date indicated above)

**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 these investigations in any other import-injury investigations conducted by the Commission on the same or similar merchandise.*

*I acknowledge that information submitted in this questionnaire response and throughout these investigations may be used by the Commission, its employees, and contract personnel who are acting in the capacity of Commission employees, for developing or maintaining the records of these investigations or related proceedings for which this information is submitted, or in internal audits and investigations relating to the programs and operations of the Commission pursuant to 5 U.S.C. Appendix 3. I understand that all contract personnel will sign non-disclosure agreements.*

_____ <i>Name of Authorized Official</i>	_____ <i>Title of Authorized Official</i>	_____ <i>Date</i>
_____ <i>Signature</i>	_____ <i>Phone: ( )</i>	_____ <i>E-mail address</i>
	_____ <i>Fax ( )</i>	

**PART I.--GENERAL INFORMATION**

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 50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the questionnaire. Send comments regarding the accuracy of this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Investigations, U.S. International Trade Commission, 500 E Street, SW, Washington, DC 20436.

I-1a. **OMB statistics.**--Please report below the actual number of hours required and the cost to your firm of preparing the reply to this questionnaire and completing the form.  
\_\_\_\_\_hours \_\_\_\_\_dollars

I-1b. **OMB feedback.**--We are interested in any comments you may have for improving this questionnaire in general or the clarity of specific questions. Please attach such comments to your response or send them to the above address.

I-2. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire (see pages 3-4 of the instruction booklet for reporting guidelines). If your firm is publicly traded, please specify the stock exchange and trading symbol.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I-3. **Petition support.**--Do you support or oppose the petition in relation to the following investigations?

- |                                  |                                 |   |                         |
|----------------------------------|---------------------------------|---|-------------------------|
| <input type="checkbox"/> Support | <input type="checkbox"/> Oppose | <input type="checkbox"/> Take no position | 701-TA-449 – CVD China  |
| <input type="checkbox"/> Support | <input type="checkbox"/> Oppose | <input type="checkbox"/> Take no position | 731-TA-1118 – AD China  |
| <input type="checkbox"/> Support | <input type="checkbox"/> Oppose | <input type="checkbox"/> Take no position | 731-TA-1119 – AD Korea  |
| <input type="checkbox"/> Support | <input type="checkbox"/> Oppose | <input type="checkbox"/> Take no position | 731-TA-1120 – AD Mexico |
| <input type="checkbox"/> Support | <input type="checkbox"/> Oppose | <input type="checkbox"/> Take no position | 731-TA-1121 – AD Turkey |

Please provide any additional comments relating to your firm's positions on the petition.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**PART I.--GENERAL INFORMATION--Continued**

I-4. **Byrd Amendment.**--Your response to question I-3 (“petition support”) will be treated as business proprietary. However, if the Commission’s final determinations in the investigations are affirmative and an antidumping or countervailing duty order is issued, the Commission, pursuant to section 754 of the Tariff Act of 1930 (the Continued Dumping and Subsidy Offset Act of 2000, or “Byrd Amendment”), will provide a list of firms supporting the petition to U.S. Customs and Border Protection for possible distribution of any antidumping or countervailing duties that may be collected. If you wish to waive business proprietary treatment of your response to question I-3 in order to make your position with respect to the petition public and allow inclusion of your firm on that list, indicate “yes” below.

- Yes
- No--I do not wish my position on the petition to be made public. I acknowledge that a “No” answer may affect my ability to receive a distribution under this Act.

I-5. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

- No
- Yes--List the following information

<u>Firm name</u>	<u>Address</u>	<u>Extent of ownership</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-6. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing LWR pipe and tube from China, Korea, Mexico, or Turkey into the United States or which are engaged in exporting LWR pipe and tube from China, Korea, Mexico, or Turkey to the United States?

- No
- Yes--List the following information

<u>Firm name</u>	<u>Address</u>	<u>Affiliation/explanation</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**PART I.--GENERAL INFORMATION--Continued**

I-7. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which are engaged in the production of LWR pipe and tube?

No             Yes--List the following information

<u>Firm name</u>	<u>Address</u>	<u>Affiliation</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

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

Further information on this part of the questionnaire can be obtained from Russell Duncan (202-708-4727, [russell.duncan@usitc.gov](mailto:russell.duncan@usitc.gov)). **Supply all data requested on a calendar-year basis.**

II-1. **Contact information (Trade).**--Who should be contacted regarding the requested trade and related information?

Company contact: \_\_\_\_\_  
Name and title

( ) \_\_\_\_\_  
Phone number E-mail address

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of LWR pipe and tube since January 1, 2005.

<i>(check as many as appropriate)</i>	<i>(please describe)</i>
<input type="checkbox"/> plant openings .....	_____ _____
<input type="checkbox"/> plant closings.....	_____ _____
<input type="checkbox"/> relocations .....	_____ _____
<input type="checkbox"/> expansions .....	_____ _____
<input type="checkbox"/> acquisitions.....	_____ _____
<input type="checkbox"/> consolidations.....	_____ _____
<input type="checkbox"/> prolonged shutdowns or production curtailments .....	_____ _____
<input type="checkbox"/> other.....	_____ _____

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

II-3. **Shared employment.**--Does your firm produce other products on the same production and related workers employed to produce LWR pipe and tube?

No             Yes--List the following information.

Products produced using the same workers and share of total production in 2007 (in percent):

<u>Product</u>	<u>Percent</u>
<u>LWR pipe and tube</u>	_____
<u>Circular mechanical pipe and tube</u>	_____
<u>Other (Describe: _____)</u>	_____
<u>Other (Describe: _____)</u>	_____
<u>Other (Describe: _____)</u>	_____

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

II-4. **Mills.**--Please provide details on the number of mills your firm operates that can produce carbon-quality steel pipe and tube that is less than 4 mm in wall thickness, as well as location, product specifications, and number that actually produced LWR pipe and tube in 2007.

Plant location (city, state)	Mills that can produce carbon-quality steel pipe and tube less than 4mm (or 0.156 inch) in wall thickness in 2007 (number of mills)	Specifications for each mill <sup>1</sup> (i.e., OD range and wall thickness range)	Mills that actually produced LWR pipe and tube in 2007 <sup>2</sup> (number of mills)

<sup>1</sup> If a particular mill produces carbon-quality steel pipe or tube that ranges in wall thickness both less than and greater than or equal to 4 mm, please indicate so in this column (i.e., "pipe specifications" column). When discussing the mill's wall range thickness please provide the approximate percentage of output of pipe that that particular mill produces that is less than 4 mm.

<sup>2</sup> The number of mills that actually produced LWR pipe and tube requested here should be equal to or less than the number of mills reported as being able to produce carbon-quality steel pipe and tube with a wall thickness of less than 4 mm (i.e., from the second column).

Additional comments/explanations: \_\_\_\_\_

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

II-5. **Overall capacity/ production.**-- Report your firm's capacity (for all carbon-quality steel pipe and tube produced on mills that can produce light-walled products) and production data for the products specified below.

<b>Quantity (in short tons)</b>			
<b>Item</b>	<b>Calendar years</b>		
	<b>2005</b>	<b>2006</b>	<b>2007</b>
<b>Capacity:</b>			
Nameplate capacity <sup>1</sup>			
Average production capacity <sup>2</sup>			
<b>Production:</b>			
of products with a wall thickness less than 4mm:			
● LWR pipe and tube <sup>3</sup>			
● Circular mechanical			
● Other (describe: _____)			
● Other (describe: _____)			
Subtotal production, < 4mm <sup>4</sup>			
of products with a wall thickness greater than or equal to 4mm produced on the mills than can produce the less than 4mm material			
● Any shape pipe or tube >= 4mm			
Total production on light-walled mills			

<sup>1</sup> The quantity of tubing production hypothetically possible were your mills to run three shifts a day, seven days a week, and 52 weeks a year without interruption.

<sup>2</sup> The average production capacity (see instructions) may differ from nameplate capacity:

    i) Nameplate capacity should be modified to reflect normal operating conditions such as your firm's typical operating levels (actual hours per week and weeks per year) and time for downtime, maintenance, repair, and cleanup. Specifically, average production capacity reported above for your firm is based on operating \_\_\_\_\_ hours per week, \_\_\_\_\_ weeks per year.

    ii) Back out any extraordinary production disruptions over the period (e.g., strikes, non-maintenance equipment shutdowns, et cetera). Does this apply to the data your firm has reported for average production capacity above?  
 No     Yes--Please describe \_\_\_\_\_.

<sup>3</sup> These quantities should correspond to the quantities reported in question II-8.

<sup>4</sup> Total production of carbon quality pipe and tube with a wall thickness of less than 4 mm.

Additional comments/explanations: \_\_\_\_\_.



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

II-6. **LWR pipe and tube capacity.**--Based on your response to question II-5, your firm's LWR pipe and tube capacity will be allocated based on the percentage of LWR pipe and tube actually produced out of all carbon-quality steel pipe and tube.

$$LWRcapacity = \left( \frac{LWRproduction}{productionallpipe} \right) * overallcapacity$$

Is this an adequate method for calculating LWR pipe and tube capacity for your firm?

Yes       No--Please explain and provide your alternate capacity numbers.

Explanation: \_\_\_\_\_

\_\_\_\_\_

**Alternate LWR pipe and tube capacity** (*answer only if you indicated "no" to this question*)

Item	Calendar year		
	2005	2006	2007
Capacity for LWR pipe and tube			

II-7. **Product shifting.**--Please describe any limits (either physical or not) on your firm's ability to shift production capacity between LWR pipe and tube and other carbon-quality steel pipe and tube products identified in question II-5.

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

II-8. **Tolling.**--Since January 1, 2005, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of LWR pipe and tube?

No       Yes--Name firm(s): \_\_\_\_\_

II-9. **FTZs.**--Does your firm produce LWR pipe and tube in a foreign trade zone (FTZ)?

No       Yes--Identify FTZ(s): \_\_\_\_\_

II-10. **Importer.**--Since January 1, 2005, has your firm imported LWR pipe and tube *from any country*?

No       Yes--**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

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

II-11. **Trade data.**--Report your firm's production, shipments, inventories, and employment related to the production of LWR pipe and tube in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet.)

Quantity (in short tons) and value (in \$1,000)			
Item	Calendar years		
	2005	2006	2007
<b>Capacity</b>	(reported earlier, <u>see</u> questions II-6 and II-7)		
<b>Beginning-of-period inventories</b> (quantity) (A)			
<b>Production</b> (quantity) (B)			
<b>U.S. shipments:</b>			
<b>Commercial shipments:</b>			
Quantity of commercial shipments (C)			
Value of commercial shipments (D)			
<b>Internal consumption:</b>			
Quantity of internal consumption (E)			
Value <sup>1</sup> of internal consumption (F)			
<b>Transfers to related firms:</b>			
Quantity of transfers (G)			
Value <sup>1</sup> of transfers (H)			
<b>Export shipments:</b> <sup>2</sup>			
Quantity of exports (I)			
Value of exports (J)			
<b>End-of-period inventories</b> (quantity) (K)			
<b>Channels of distribution:</b>			
U.S. shipments to distributors (quantity) (L)			
U.S. shipments to end users (quantity) (M)			
<b>Employment data:</b>			
Average number of PRWs (number) (N)			
Hours worked by PRWs (1,000 hours) (O)			
Wages paid to PRWs (value) (P)			
<sup>1</sup> Internal consumption and transfers to related firms must be valued at fair market value. In the event that you use a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, <i>et cetera</i> ) and provide value data using that basis for 2005, 2006, and 2007 below:  			
<sup>2</sup> Identify your principal export markets: _____  			

II-12. **Reconciliation of data.**--Please note that the quantities reported in question II-11 should reconcile as follows in each period (*i.e.*, in each column):

Reconciliation

A + B - C - E - G - I = K

Do these data reconcile?  Yes  No--Please explain \_\_\_\_\_.

C + E + G = L + M

Do these data reconcile?  Yes  No--Please explain \_\_\_\_\_.

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

II-13. **Corrosion-resistant and black LWR pipe and tube.**--Please provide the following information on your firm's 2007 production of LWR pipe and tube.

	<b>Share of U.S. shipments in 2007 (percent)</b>	<b>Share of exports in 2007 (percent)</b>
Corrosion-resistant LWR pipe and tube		
Black LWR pipe and tube		
Total production <sup>1</sup>	100 percent	100 percent
<sup>1</sup> The shares reported here should be calculated from reported U.S. shipments (lines G, E, and G) and export shipments (line I) for 2007 as reported in response to question II-11.		

II-14. **Purchases of LWR pipe and tube.**--Other than direct imports, has your firm otherwise purchased LWR pipe and tube since January 1, 2005? (See definitions in the instruction booklet.)

- No                       Yes--Please indicate the reason(s) for such purchases (if your reasons differ by source, please elaborate) in the space provided and then indicate in the table the quantities and values of such purchases.

Reason(s): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Note.--If your firm directly imported LWR pipe and tube from any country since January 2005, you are directed to complete the separate U.S. Importers' Questionnaire (see question II-10).

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

**II-15. Purchases of LWR pipe and tube--Continued**

(Quantity in short tons, value in \$1,000)			
Item	Calendar years		
	2006	2006	2007
<b>PURCHASES OF U.S. IMPORTS OF LWR PIPE AND TUBE FROM--</b>			
China: <sup>1</sup>			
Quantity			
Value			
Korea: <sup>2</sup>			
Quantity			
Value			
Mexico: <sup>3</sup>			
Quantity			
Value			
Turkey: <sup>4</sup>			
Quantity			
Value			
All other countries: <sup>5</sup>			
Quantity			
Value			
<b>PURCHASES OF DOMESTICALLY PRODUCED LWR PIPE AND TUBE:<sup>6</sup></b>			
Quantity			
Value			
<p><sup>1</sup> Please list the name(s) of the firm(s) from which you purchased <u>Chinese</u> LWR pipe and tube.</p> <hr/> <hr/>			
<p><sup>2</sup> Please list the name(s) of the firm(s) from which you purchased <u>Korean</u> LWR pipe and tube.</p> <hr/> <hr/>			
<p><sup>3</sup> Please list the name(s) of the firm(s) from which you purchased <u>Mexican</u> LWR pipe and tube.</p> <hr/> <hr/>			
<p><sup>4</sup> Please list the name(s) of the firm(s) from which you purchased <u>Turkish</u> LWR pipe and tube.</p> <hr/> <hr/>			
<p><sup>5</sup> Please list the name(s) of the firm(s) from which you purchased <u>nonsubject</u> LWR pipe and tube.</p> <hr/> <hr/>			
<p><sup>6</sup> Please list the name(s) of the firm(s) from which you purchased <u>domestic</u> LWR pipe and tube.</p> <hr/> <hr/>			

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

II-16. As reported in question II-11, has your firm internally transferred/consumed any portion of its production of LWR pipe and tube in order to produce downstream product(s) such as fencing, window guard, carports (product(s) produced at least in part from internal transfers of LWR pipe and tube)?

- No--Skip to Part III.                       Yes--Complete questions II-17 through II-24.

II-17. Please identify the specific downstream product(s) that your firm produces from internal transfers of LWR pipe and tube, the percent that product accounts for out of internal consumption in 2007, and the share of the raw material cost of producing your downstream product(s) that was accounted for by LWR pipe and tube.

<u>Product</u>	<u>Share of internal consumption in 2007 (in percent)</u>	<u>LWR pipe and tube's share of downstream production cost (in percent)</u>
● Fencing and railings .....	_____	_____
● Window guards and framing.....	_____	_____
● Shelving systems, scaffolding, and racks.....	_____	_____
● Furniture and athletic equipment.....	_____	_____
● Carports.....	_____	_____
● Other: _____	_____	_____
● Other: _____	_____	_____
● Other: _____	_____	_____
Total	100 percent	This column should <b>not</b> total to 100 percent.

Note.--the reported share of internal consumption in 2007 should be calculated from the data reported in question II-11 line E.

II-18. Was all of the LWR pipe and tube that your firm transferred for internal processing actually processed into a downstream product?

- Yes                       No--Please report the quantity and value sold in the LWR pipe and tube merchant market in 2007.

Quantity (*short tons*): \_\_\_\_\_ Value (*\$1,000 dollars*): \_\_\_\_\_

Please also report any quantity and value of internally consumed LWR pipe and tube in 2007 that was unusable and/or was used for some purpose other than the processing of a downstream product. Please also specify the purpose.

Quantity (*short tons*): \_\_\_\_\_ Value (*\$1,000 dollars*): \_\_\_\_\_

Purpose: \_\_\_\_\_

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

II-19. In 2007, was the LWR pipe and tube that you sold in the merchant market (primarily question II-11, line C) generally used in the production of downstream products by your customers?

- No     Don't know     Yes-- Please identify your two major customers, the major downstream products involved, and the approximate share (*in percent*) of the volume of your merchant market sales of LWR pipe and tube in 2007 that was used in the production of downstream products by all of your customers.

<u>Item</u>	<u>Percent of volume of merchant market sales in 2007 (in percent)</u>
<b>Two largest customers that produce downstream products using LWR pipe and tube--</b>	
Customer 1: _____	_____
Customer 2: _____	_____
<b>Share of overall merchant market sales--</b>	
● Known to be used in the production of downstream products (customer 1 and customer 2 reported above should be a subset of this category) (A).	_____
• of which, Fencing and railings (B)	_____
• of which, Window guards and framing (C)	_____
• of which, Shelving systems, scaffolding, and racks (D)	_____
• of which, Furniture and athletic equipment (E)	_____
• of which, Carports (F)	_____
• of which, All other products (G)	_____
● Known to be consumed as is without further processing (H)	_____
● Use unknown (I)	_____

Note.--Lines A, H, and I should sum to equal 100 percent. Lines B, C, D, E, F, and G should sum to equal line A. The shares reported for customers 1 and 2 are subsets of line A.

II-20. In 2007, did your firm transfer any LWR pipe and tube to related firms (refer to question II-11, line G)?

- No Skip to Part III     Yes--Please provide the following information and answer the remaining questions in part II.

<u>Related company</u>	<u>Your ownership interest (in percent)</u>	<u>Other firms with an ownership interest in the company</u>	<u>Their ownership interest (in percent)</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

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

II-21. In 2007, did the related company(ies) identified above source LWR pipe and tube from any companies other than your firm?

- No                       Yes--Please list the other sources from which each related company obtained LWR pipe and tube and what percentage came from each source. Please also indicate whether or not the LWR pipe and tube from each other source was provided under a toll agreement.

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II-22. Are your firm's transfers to the related company(ies) identified above made through a toll operation (*i.e.*, do you maintain legal title to the LWR pipe and tube that you transfer)?

- Yes                       No-- Please indicate whether the price your company sells LWR pipe and tube to the related company(ies) is established:

- Based on market prices for LWR pipe and tube, or  
 Based on a non-market formula. (If price is based on a non-market formula, please explain the formula for valuing the LWR pipe and tube, including what factors such as costs, profit, *etc.*, are used to arrive at the value for the LWR pipe and tube transferred).

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II-23. What entity holds the marketing/distribution rights (*i.e.*, sells) the product(s) produced by the related company(ies)?

- Your firm (including any joint ventures)                       Related company(ies)

If the joint venture partners and other owners sell the products produced by the related company(ies), how is the production of the related company divided among the joint venture partners and other owners?

- By ownership share                       Otherwise--please specify.

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II-24. Are transfers to the related companies(ies) valued differently from other internal transfers?

- No                       Yes--Please explain the basis for the difference in valuation.

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**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Justin Jee (202-205-3186, [justin.jee@usitc.gov](mailto:justin.jee@usitc.gov)).

III-1. **Contact information (Financials).**--Who should be contacted regarding the requested financial information?

Company contact: \_\_\_\_\_

Name and title \_\_\_\_\_

( ) \_\_\_\_\_ E-mail address \_\_\_\_\_

Phone number \_\_\_\_\_

( ) \_\_\_\_\_

Fax number \_\_\_\_\_

III-2. **Accounting system.**--Briefly describe your financial accounting system.

- A. When does your fiscal year end (month and day)?<sup>1</sup> \_\_\_\_\_  
If your fiscal year changed during the period examined, explain below:  
\_\_\_\_\_
- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include subject merchandise:  
\_\_\_\_\_
- 2. Does your firm prepare profit/loss statements for the subject merchandise:  
 Yes  No
- 3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.  
 Audited,  unaudited,  annual reports,  10Ks,  10 Qs,  
 Monthly,  quarterly,  semi-annually,  annually
- 4. Accounting basis:  GAAP,  cash,  tax, or  other comprehensive (specify) \_\_\_\_\_

*Note:--The Commission may request that your company submit copies of its financial statements, including internal profit-and-loss statements for the division or product group that includes LWR pipe and tube, as well as those statements and worksheets used to compile data for your firm's questionnaire response.*

III-3. **Cost accounting system.**--Briefly describe your cost accounting system (e.g., standard cost, job order cost, *et cetera*).

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

<sup>1</sup> If your firm has a fiscal year end other than on December 31, to the extent possible please provide the data requested in this section (questions III-6, III-7, III-8, and III-9) on a calendar year basis.



**PART III.--FINANCIAL INFORMATION--Continued**

III-4. **Allocation basis.**--Briefly describe your allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

\_\_\_\_\_

\_\_\_\_\_

III-5. **Other products.**--Please list any other products you produced in the facilities in which you produced LWR pipe and tube, and provide the share of net sales accounted for by LWR pipe and tube and by other products in your most recent fiscal year:

<u>Products</u>	<u>Share of sales</u>
<u>LWR pipe and tube</u>	_____
<u>Circular mechanical pipe</u>	_____
_____	_____
_____	_____
_____	_____

III-6. Does your firm receive inputs (raw materials, labor, energy, or any other services) used in the production of LWR pipe and tube from any related firm?

Yes--Continue to question III-7 below.       No--Continue to question III-10 below.

III-7. In the space provided below, identify the inputs related to the production of LWR pipe and tube that your firm receives from related parties whose financial statements are consolidated with the financial statements of your firm.

<u>Input</u>	<u>Related party</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

**PART III.--FINANCIAL INFORMATION--Continued**

III-8. With respect to the related companies identified in response to question III-7 above, are their financial statements consolidated with your firm's financial statements? (In other words, are profits or losses arising from intercompany transactions eliminated?)

- Yes--Continue to question III-9 below.       No--Continue to question III-10 below.

III-9. All intercompany profit on inputs purchased from related parties that is eliminated pursuant to formal financial statement consolidation should also be eliminated from the costs reported to the Commission in question III-11 (*i.e.*, costs reported in question III-11, to the extent that they reflect inputs purchased from related parties, should only reflect the related party's cost and not include an associated profit component). Reasonable methods for determining and eliminating the associated profit on inputs purchased from related parties are acceptable.

Has your firm complied with the Commission's instructions regarding costs associated with inputs purchased from related parties?

- Yes       No—Please contact Justin Jee at (202) 205-3186 or [justin.jee@usitc.gov](mailto:justin.jee@usitc.gov).

III-10. **Nonrecurring charges/income.**--For each annual period for which financial results are reported in question III-11, please indicate in the schedule below the specific nonrecurring charges/income, the particular expense/cost line items from question III-11 where the associated charges/income are included, a brief description of the charges/income, and the associated values (*in \$1,000*). Nonrecurring charges/income would include, but are not limited to, items such as asset write-offs and accelerated depreciation due to restructuring of the company's LWR pipe and tube operations.

Item	Fiscal years ended--		
	_____	_____	_____
<b>Non-recurring charges/income:</b> (In this column please provide a brief description of each nonrecurring item and indicate the particular line items where the associated charges/income are included in question III-7.)			
1.			
2.			
3.			
4.			
5.			
6.			

**PART III.--FINANCIAL INFORMATION--Continued**

III-11. **Operations on LWR pipe and tube.**--Report the revenue and related cost information requested below on the LWR pipe and tube operations of your U.S. establishment(s).<sup>1</sup> Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value and purchases from related firms must be at cost.<sup>2</sup> Please provide the financial data for your three most recently completed fiscal years in chronological order from left to right. If your firm was involved in tolling operations (either as the toller or as the tollee) please contact Justin Jee at (202) 205-3186 or [justin.jee@usitc.gov](mailto:justin.jee@usitc.gov) before completing this section of the questionnaire.

<b>Quantity (in short tons) and value (in \$1,000)</b>			
<b>Item</b>	<b>Fiscal years ended--</b>		
	_____	_____	_____
<b>Net sales quantities:</b> <sup>3</sup>			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales quantities			
<b>Net sales values:</b> <sup>3</sup>			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values			
<b>Cost of goods sold (COGS):</b> <sup>4</sup>			
Raw materials			
Direct labor			
Other factory costs			
Total COGS			
<b>Gross profit or (loss)</b>			
<b>Selling, general, and administrative (SG&amp;A) expenses:</b>			
Selling expenses			
General and administrative expenses			
Total SG&A expenses			
<b>Operating income (loss)</b>			
<b>Other income and expenses:</b>			
Interest expense			
All other expense items			
All other income items			
All other income or expenses, net			
<b>Net income or (loss) before income taxes</b>			
<b>Depreciation/amortization included above</b>			
<sup>1</sup> Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations. <sup>2</sup> Please list the expense categories and amounts of any profits on internal inputs or inputs from related firms that are reflected on your books but which are eliminated from the costs reported below. <sup>3</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire. <sup>4</sup> COGS should include costs associated with internal consumption and transfers to related firms			

**PART III.--FINANCIAL INFORMATION--Continued**

III-8. **Asset values.**--Report the total assets associated with the production, warehousing, and sale of LWR pipe and tube. If your firm does not maintain some or all of the specific asset data in the normal course of business, please estimate it based upon some rational method (such as production, sales, or costs) that is consistent with your cost allocations in the previous question. Your finished goods inventory value should reconcile with the inventory quantity data reported in Part II. Please provide the financial data for your three most recently completed fiscal years in chronological order from left to right.

Value (in \$1,000)			
Item	Fiscal years ended--		
	_____	_____	_____
<b>Assets associated with the production, warehousing, and sale of LWR pipe and tube:</b>			
1. Current assets:			
A. Cash and equivalents			
B. Accounts receivable, net			
C. Inventories			
D. All other current			
E. Total current assets (lines 1.A. through 1.D.)			
2. Non-current assets:			
A. Original cost of property, plant, and equipment (PPE)			
B. Less: Accumulated depreciation			
C. Equals: Net book value of PPE (line 2.A less line 2.B)			
D. All other non-current assets:			
E. Total non-current assets: (lines 2.C through 2.D)			
<b>3. Total assets</b> (lines 1.E and 2.E)			

III-9. **Capital expenditures and R&D.**--Capital expenditures and research and development expenditures.--Report your firm's capital expenditures and research and development expenditures on LWR pipe and tube. Please provide the financial data for your three most recently completed fiscal years in chronological order from left to right.

Value (in \$1,000)			
Item	Fiscal years ended--		
	_____	_____	_____
<b>Capital expenditures</b>			
<b>Research and development expenditures</b>			

**PART III.--FINANCIAL INFORMATION--Continued**

III-10. **Impact of imports.**--Since January 1, 2005, has your firm experienced any actual negative effects on its return on investment or its growth, investment, ability to raise capital, existing development and production efforts (including efforts to develop a derivative or more advanced version of the product), or the scale of capital investments as a result of imports of LWR pipe and tube from China, Korea, Mexico, or Turkey?

- No             Yes--My firm has experienced actual negative effects as follows:
- Cancellation, postponement, or rejection of expansion projects
  - Denial or rejection of investment proposal
  - Reduction in the size of capital investments
  - Rejection of bank loans
  - Lowering of credit rating
  - Problem related to the issue of stocks or bonds
  - Other (specify) \_\_\_\_\_

III-11. **Anticipated impact of imports.**--Does your firm anticipate any negative impact of imports of LWR pipe and tube from China, Korea, Mexico, or Turkey?

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**PART IV.--PRICING AND RELATED INFORMATION**

Further information on this part of the questionnaire can be obtained from Ioana Mic (202-205-3196, [ioana.mic@usitc.gov](mailto:ioana.mic@usitc.gov))

IV-1. **Contact information (Price)**--Who should be contacted regarding the requested pricing and related information?

Company contact:

\_\_\_\_\_

( ) \_\_\_\_\_

Phone number

\_\_\_\_\_

E-mail address

**PRICE DATA**

This section requests quarterly quantity and value data on your firm's U.S. shipments of the following products during January 2005 to December 2007.

**Product 1.**--ASTM A-513 (mechanical) or A-500 grade A or B (ornamental), carbon welded, not pickled and oiled, 2 inch square, 0.120 inch (+ or -10 percent) wall thickness (11 gauge), 20 foot or 24 foot lengths.

**Product 2.**--ASTM A-513 (mechanical) or A-500 grade A or B (ornamental) tubing, carbon welded, pickled and oiled, 1 inch square, 0.065 inch nominal wall thickness (+ or - 10 percent) (16 gauge), 20 foot or 24 foot mill lengths.

**Product 3.**--ASTM A-513 (mechanical) or A-500 grade A or B (ornamental), hot-rolled, not pickled and oiled, 11 gauge or 0.120 inch +/- 10% wall, three inch square to four inches square, or in rectangular circumferences of 12 inches to 16 inches, lengths of 20 to 24 feet.

**Product 4.**--ASTM A-513 (mechanical) or A-500 grade A or B (ornamental), 16 gauge or .065 inch +/- 10% wall, galvanized, one inch square, lengths of 20 to 24 feet.

**Product 5.**--ASTM A-513 (mechanical) or A-500 grade A or B (ornamental) tubing, galvanized, 2.5 inch square, 0.083 nominal wall thickness (+ or - 10 percent) (14 gauge), lengths of 20 to 24 feet.

**Please note that total dollar values in this section should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Total dollar values should reflect the FINAL NET amount paid to you (i.e., should be net of all deductions for discounts or rebates). See instruction booklet.**

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-2. **Price data.**--Report the quarterly price data<sup>1</sup> for the pricing products<sup>2</sup> below.

Quantity (in short tons) and value (in dollars)																																
Period of shipment	Product 1		Product 2		Product 3																											
	Quantity	Value	Quantity	Value	Quantity	Value																										
<b>2005:</b>																																
Jan-Mar																																
Apr-Jun																																
Jul-Sep																																
Oct-Dec																																
<b>2006:</b>																																
Jan-Mar																																
Apr-Jun																																
Jul-Sep																																
Oct-Dec																																
<b>2007:</b>																																
Jan-Mar																																
Apr-Jun																																
Jul-Sep																																
Oct-Dec																																
Period of shipment	Product 4		Product 5		X																											
	Quantity	Value	Quantity	Value																												
<b>2005:</b>							X																									
Jan-Mar																																
Apr-Jun									X																							
Jul-Sep																																
Oct-Dec											X																					
<b>2006:</b>													X																			
Jan-Mar															X																	
Apr-Jun																	X															
Jul-Sep																			X													
Oct-Dec																					X											
<b>2007:</b>																							X									
Jan-Mar																									X							
Apr-Jun																											X					
Jul-Sep																													X			
Oct-Dec																															X	

<sup>1</sup> Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point of shipment.

<sup>2</sup> Pricing product definitions are provided on the first page of section IV.

Note.--If your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:

Product 1: \_\_\_\_\_

Product 2: \_\_\_\_\_

Product 3: \_\_\_\_\_

Product 4: \_\_\_\_\_

Product 5: \_\_\_\_\_

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-3. How does your firm determine the prices that it charges for sales of LWR pipe and tube (*check all that apply*)? If your firm issues price lists, please include a copy of a recent price list with your submission. If your price list is large, please submit sample pages.

- Transaction by transaction                       Contracts                       Set price lists  
 Other--Please describe: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

IV-4. Please describe your firm's discount policy (*check all that apply*).

- Quantity discounts                       Annual total volume discounts                       No discount policy  
 Other--Please describe: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

IV-5. (a) What are your firm's typical sales terms for its U.S.-produced LWR pipe and tube (e.g., 2/10 net 30 days)? \_\_\_\_\_.

- (b) On what basis are your prices of domestic LWR pipe and tube usually quoted? (check one)  
 F.o.b.--Please specify point: \_\_\_\_\_                       Delivered

IV-6. Approximately what share of your firm's sales of its U.S.-produced LWR pipe and tube in 2007 were on a (1) long-term contract basis (multiple deliveries for more than 12 months), (2) short-term contract basis (multiple deliveries up to 12 months), and (3) spot sales basis (for a single delivery)?

<b>Type of sale</b>	<b>Share of sales (percent)</b>
Long term contracts	
Short term contracts	
Spot sales	
Total	100 %



**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-7. If you sell on a long-term contract basis, please answer the following questions with respect to provisions of a typical long-term contract.

- (a) What is the average duration of a contract? \_\_\_\_\_
- (b) Can prices be renegotiated during the contract period?     Yes     No
- (c) Does the contract fix quantity, price, or both?     Quantity     Price     Both
- (d) Does the contract have a meet or release provision?     Yes     No

IV-8. If you sell on a short-term contract basis, please answer the following questions with respect to provisions of a typical short-term contract.

- (a) What is the average duration of a contract? \_\_\_\_\_
- (b) Can prices be renegotiated during the contract period?     Yes     No
- (c) Does the contract fix quantity, price, or both?     Quantity     Price     Both
- (d) Does the contract have a meet or release provision?     Yes     Not

IV-9. What is the average lead time between a customer's order and the date of delivery for your firm's sales of your U.S.-produced LWR pipe and tube?

Source	Share of sales 2007	Lead time
From inventory	percent	days
Produced to order	percent	days
Total/average	100 percent	days ( <i>i.e.</i> , average)

- IV-10. (a) What is the approximate percentage of the total delivered cost of LWR pipe and tube that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent.
- (b) Who generally arranges the transportation to your customers' locations? (check one)  
 Your firm                                     Purchaser
- (c) What proportion of your sales occur within 100 miles of your storage or production facility? \_\_\_\_\_ percent. Within 101 to 1,000 miles? \_\_\_\_\_ percent. Over 1,000 miles? \_\_\_\_\_ percent.

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-11. (a) Based on the quantity of your firm's U.S. shipments in 2007 as reported in response to questions II-11 above, please indicate the percentage share for which each of the following geographic markets account. Please answer this question in reference to your sales to ultimate delivery destinations to customers in the United States.

**Share of U.S.  
shipments in  
2007**

**(in percent)**

**Geographic area**

\_\_\_\_\_

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

\_\_\_\_\_

**Midwest.**—IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.

\_\_\_\_\_

**Southeast.**—AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.

\_\_\_\_\_

**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, VI, among others.

**Total = 100%**

Note.--These shares should be calculated from all reported U.S. shipments in 2007 (lines C, E, and G) from question II-11.

IV-11. (b) Based on the quantity of your firm's export shipments in 2007 as reported in response to questions II-11 above, please indicate the percentage share for which each of the following geographic markets account.

**Share of  
export  
shipments in  
2007**

**(in percent)**

**Geographic area**

\_\_\_\_\_

**NAFTA export markets** (*i.e.*, Canada and Mexico)

\_\_\_\_\_

**All other export markets**

**Total = 100%**

Note.--These shares should be calculated from export shipments in 2007 (line I) from question II-11.

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-12. Referring to the geographic areas identified in the previous question, please indicate whether there have been any geographic areas in which your firm has attempted to sell its LWR pipe and tube and could not or whether there are certain geographic areas in which your firm has attempted to expand its presence but could not, and describe.

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IV-13. Describe the end uses of the LWR pipe and tube that you manufacture. For each end-use product, estimate the percentage of the total cost (*i.e.* to the ultimate end user) is typically accounted for by LWR pipe and tube (their raw material input), as estimate what share of your firm's sales are ultimately destined for those ends uses.

<u>End use</u>	<u>Share of your firm's 2007 sales (in percent)</u>	<u>Estimated share of total cost of end product (in percent or a range of percentages)</u>
Fencing and railings .....	_____	_____
Window guards and framing .....	_____	_____
Shelving systems, scaffolding, and racks ...	_____	_____
Furniture and athletic equipment .....	_____	_____
Carports.....	_____	_____
Other: _____	_____	_____
Other: _____	_____	_____
Other: _____	_____	_____
Unknown end uses ( <i>i.e.</i> , sold to distributors <u>and</u> ultimate customers' end uses unknown) .....	_____	_____
Total .....	<u>100 percent</u>	**This column should <u>not</u> total 100 percent.

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-14. Please list in order of importance any products that may be substituted for LWR pipe and tube. For each possible substitute product, please give examples of applications and end uses for which they are substitutes and indicate whether changes in the price of the substitute affect the price for LWR pipe and tube.

Substitute	End use	Have changes in the prices of this substitute affected the price for LWR pipe and tube?
1.		<input type="checkbox"/> No <input type="checkbox"/> Yes
2.		<input type="checkbox"/> No <input type="checkbox"/> Yes
3.		<input type="checkbox"/> No <input type="checkbox"/> Yes
4.		<input type="checkbox"/> No <input type="checkbox"/> Yes
5.		<input type="checkbox"/> No <input type="checkbox"/> Yes

IV-15. (a) How has the demand within the United States for LWR pipe and tube changed since January 1, 2005? What principal factors affect changes in demand?

- Increase       No Change       Decrease       Fluctuated

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(b) How has the demand outside the United States (if known) for LWR pipe and tube changed since January 1, 2005? What principal factors affect changes in demand?

- Increase       No Change       Decrease       Fluctuated

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IV-16. Have there been any significant changes in the product range or marketing of LWR pipe and tube since January 1, 2005?

- No       Yes-- Please describe.

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**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-17. Is LWR pipe and tube produced in the United States and in other countries interchangeable (*i.e.*, can they physically be used in the same applications)? Please indicate below, using "A" to indicate that the products from a specified country-pair are always interchangeable, "F" to indicate that the products are frequently interchangeable, "S" to indicate that the products are sometimes interchangeable, "N" to indicate that the products are never interchangeable, and "0" to indicate no familiarity with products from a specified country-pair.<sup>1</sup>

Country-pair	United States	China	Korea	Mexico	Turkey	Canada	Other countries
United States	X						
China	X	X					
Korea	X	X	X				
Mexico	X	X	X	X			
Turkey	X	X	X	X	X		
Canada	X	X	X	X	X	X	

<sup>1</sup> For any country-pair producing LWR pipe and tube which is *sometimes* or *never* interchangeable, please explain the factors that limit or preclude interchangeable use:

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**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-18. Are differences other than price (*i.e.*, quality, availability, transportation network, product range, technical support, *et cetera*) between LWR pipe and tube produced in the United States and in other countries a significant factor in your firm's sales of the products? Please indicate below, using "A" to indicate that such differences are always significant, "F" to indicate that such differences are frequently significant, "S" to indicate that such differences are sometimes significant, "N" to indicate that such differences are never significant, and "0" to indicate no familiarity with products from a specified country-pair.<sup>1</sup>

<b>Country-pair</b>	United States	China	Korea	Mexico	Turkey	Canada	Other countries
United States	X						
China	X	X					
Korea	X	X	X				
Mexico	X	X	X	X			
Turkey	X	X	X	X	X		
Canada	X	X	X	X	X	X	

<sup>1</sup> For any country-pair for which factors other than price always or frequently are a significant factor in your firm's sales of LWR pipe and tube, identify the country-pair and report the advantages or disadvantages imparted by such factors:

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**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-19. Please identify below the names and addresses of your firm's 10 largest customers for LWR pipe and tube during the 2005-07 period. Please also provide the name and telephone number of a contact person and the share of the quantity of your firm's total shipments of LWR pipe and tube that each of these customers accounted for during the 2005-07 and 2007 periods.

No.	Customer (firm) name	Street address (not P.O. box), city, state, and zip code	Contact person and e-mail address	Area code and telephone number	Share of 2005-07 sales(%)	Share of 2007 sales(%)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						





**PART V.--LOST SALES AND LOST REVENUES --Continued**

**Note.**--This section is to be completed only by non-petitioners, or by petitioners providing allegations involving quotes made *after the date of the filing of the petition*. Please do not re-submit allegations provided in the preliminary phase of these investigations.

V-2. **COMPETITION FROM IMPORTS--LOST SALES**--Since January 1, 2005 (see note above): Did your firm lose sales of LWR pipe and tube to imports of these products from China, Korea, Mexico, and/or Turkey?

No             Yes

If yes, please furnish as much of the following information as possible for each affected transaction. Document such allegations of lost sales whenever possible (documentation could include copies of invoices, sales reports, or letters from customers). Please note that the Commission may contact the firms named to verify the allegations reported. Please do not re-submit allegations provided in the preliminary phase of these investigations.

- Customer name, contact person, phone and fax numbers
- Specific product(s) involved
- Date of your price quotation
- Quantity involved
- Your rejected price quotation (total delivered value)
- The country of origin of the competing imported product
- The accepted price quotation of the imported product (total delivered value)

Customer name, contact person, phone and fax numbers	Product	Date of quote	Quantity ( <i>short tons</i> )	Rejected U.S. price (total value-- <i>dollars</i> )	Country of origin	Competing import price (total value-- <i>dollars</i> )