

**U.S. PRODUCERS' QUESTIONNAIRE**  
**POLYVINYL ALCOHOL FROM TAIWAN**

**This questionnaire must be received by the Commission by no later than October 27, 2010**

*See page 4 of 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 antidumping duty investigation concerning polyvinyl alcohol ("PVA") from Taiwan (Inv. No. 731-TA-1088 (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)).

<p><b>Name of firm</b> _____</p> <p><b>Address</b> _____</p> <p><b>City</b> _____ <b>State</b> _____ <b>Zip Code</b> _____</p> <p><b>World Wide Web address</b> _____</p> <p>Has your firm produced any form of PVA at any time since January 1, 2007 (i.e., scope PVA, PVB-grade PVA, PVA in fiber form, or low-hydrolysis PVA as defined in the instruction booklet and on page two of this questionnaire)?</p> <p><input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><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)</p>
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**CERTIFICATION**

*I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission.*

*By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury investigations conducted by the Commission on the same or similar merchandise.*

*I acknowledge that information submitted in this questionnaire response and throughout this proceeding 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 this proceeding 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.*

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

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

\_\_\_\_\_  
*Date*

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Phone: ( )*

\_\_\_\_\_  
*Fax ( )*

\_\_\_\_\_  
*E-mail address*

**For purposes of this questionnaire, the term “PVA” refers to all polyvinyl alcohol including polyvinyl alcohol that is in the scope of this investigation (defined below as “SCOPE PVA”) and out-of-scope polyvinyl alcohol described below.**

**Except as otherwise stated, the information being sought throughout this questionnaire concerns polyvinyl alcohol in the scope of this investigation, defined below as “SCOPE PVA”.**

**SCOPE PVA:** For purposes of this investigation, the Department of Commerce has defined the subject merchandise as all polyvinyl alcohol hydrolyzed in excess of 80 percent, whether or not mixed or diluted with commercial levels of defoamer or boric acid. PVB-grade low-ash polyvinyl alcohol (defined below as PVB-GRADE PVA) and PVA in fiber form are not included in the scope of this investigation. The merchandise under investigation is currently classifiable under subheading 3905.30.00 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheading is provided for convenience and customs purposes, the written description of the merchandise under investigation is dispositive.

**OUT-OF-SCOPE PVA:**

**The Commission is seeking additional but more limited information regarding three forms of polyvinyl alcohol that are excluded from the scope of these investigations: PVB-grade low-ash polyvinyl alcohol (defined below as PVB-GRADE PVA); polyvinyl alcohol in fiber form (“PVA IN FIBER FORM”) and polyvinyl alcohol hydrolyzed at 80 percent or below (“LOW-HYDROLYSIS PVA”). Questions seeking information on PVB-GRADE PVA, PVA IN FIBER FORM and LOW-HYDROLYSIS PVA will be clearly identified in the title or the text of the question.**

**PVB-GRADE PVA:** For purposes of this questionnaire, this term applies to PVB-grade low-ash PVA that meets the following specifications: Hydrolysis, Mole % of  $98.40 \pm 0.40$ , 4% Solution Viscosity  $30.00 \pm 2.50$  centipois, and ash—ISE, wt% less than 0.60, 4% solution color 20mm cell, 10.0 maximum APHA units, haze index, 20 mm cell, 5.0, maximum.

**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 page 3 of the instruction booklet for reporting guidelines). If your firm is publicly traded, please specify the stock exchange and trading symbol.

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I-3. **Petition support**--Do you support or oppose the petition?

Support     Oppose     Take no position

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

I-4. **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>Percentage of ownership</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-5. **Related importers/exporter.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing scope PVA from Taiwan into the United States or which are engaged in exporting scope PVA from Taiwan to the United States?

No       Yes--List the following information.

<u>Firm name</u>	<u>Address</u>	<u>Affiliation</u>	<u>Percentage of ownership</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which are engaged in the production of PVA?

No       Yes--List the following information.

<u>Firm name</u>	<u>Address</u>	<u>Affiliation</u>	<u>Percentage of ownership</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

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

Further information on this part of the questionnaire can be obtained from Angela Newell (202-708-5409, [angela.newell@usitc.gov](mailto:angela.newell@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 PVA since January 1, 2007?

<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"/> revised labor agreements.....	_____ _____
<input type="checkbox"/> other ( <i>e.g.</i> , technology) .....	_____ _____

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

II-3. **Same equipment, machinery, and workers.**--Has your firm since 2007 produced, or does your firm anticipate producing in the future, other products on the same equipment and machinery used in the production of scope PVA and/or using the same production and related workers employed to produce scope PVA?

- No                       Yes--List the following information and report your firm's combined production capacity and production of these products and scope PVA in the periods indicated.

<u>Product</u>	<u>Period</u>	<u>Basis for allocation of capacity and employment data (indicate if different)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

<i>(Quantity in 1,000 pounds)</i>					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
<b>Overall PVA Production Capacity</b>					
<b>Production of:</b>					
Scope PVA					
PVB-grade PVA					
PVA in fiber form					
Low-hydrolysis PVA					
Other (specify) _____					

II-4. **Production constraints and product shifting.**--Please describe the constraint(s) that set the limit(s) on your production capacity and your ability to shift production capacity between products.

\_\_\_\_\_

\_\_\_\_\_

II-5. **Tolling.**--Since January 1, 2007, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of PVA?

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

II-6. **Foreign trade zone.**--Does your firm produce PVA in a foreign trade zone (FTZ)?

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

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

II-7. **Importer.**--Since January 1, 2007, has your firm imported PVA?

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

II-8. In 2009, did your firm internally transfer (captively consume) any portion of its production of PVA for use in the production of a downstream product?

- No-Skip questions II-9 to II-15.                       Yes-Complete questions II-9 to II-15.

II-9. Approximately what share (*in percent*) of the volume of your firm's production of PVA in 2009 was transferred internally for your production of downstream product(s)?

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II-10. Please specifically identify the downstream products that your firm produces from your firm's internal transfers of PVA (*e.g.*, PVB, PVB sheet, etc.).

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II-11. Was all of the PVA that your company transferred for internal processing actually processed into downstream product?

- Yes                       No-Please report the quantity (in 1,000 pounds) and value (in \$1,000) sold in the PVA merchant market in 2009.

Quantity: \_\_\_\_\_ Value: \_\_\_\_\_

Please report the quantity and value in 2009 that was usable and/or was used for some purpose other than the processing of a downstream product. Please also specify the purpose.

Quantity: \_\_\_\_\_ Value: \_\_\_\_\_ Purpose: \_\_\_\_\_

II-12. Approximately what share of the raw material cost of producing your downstream product(s) in 2009 was accounted for by PVA?

<b>Downstream product</b>	<b>Share of raw material cost (<i>in percent</i>)</b>

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

II-13. In 2009, was the PVA that you sold in the merchant market generally used in the production of downstream products by your customers?

No     Don't know

Yes-Please identify your two largest customers and the major downstream product(s) involved. In addition, please identify the approximate portion (*in percent*) of the volume of your merchant market sales of PVA in 2009 that was used in the production of downstream products by all your customers.

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II-14. In 2009, was any portion of your merchant market sales of PVA used by your customers to produce the same downstream product(s) that your firm produces from PVA that you produced?

We don't sell PVA in the merchant market.     Don't know

Yes-Please indicate the approximate share (*in percent*) of the volume of your merchant market sales of PVA in 2009 that was used in the production of the same downstream products that your firm produces from your PVA.

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II-15. Does the PVA that your firm produces and captively consumes differ from the PVA sold by your firm in the merchant market?

We don't sell PVA in the merchant market.     No

Yes-Please explain any differences.

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

II-16. Please list each related company to which you transferred PVA during 2009.

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II-17. In 2009, did the related company(ies) identified in the response to question II-16 source PVA from any companies other than your firm?

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

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II-18. Are your transfers to the related company(ies) identified above made through a toll operation (i.e., do you maintain legal title to the PVA that you transfer to the related company(ies)?)

- Yes       No-Please indicate how the price at which your company sells PVA to the related Company(ies) is established:

- Based on market prices for PVA                       Based on non-market formula.

If price is based on a non-market formula, please explain the formula for valuing the PVA, including what factors such as costs, profit, etc., are used to arrive at the value for the PVA transferred to the related company(ies).

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II-19. Are transfers to the related party(ies) valued differently from other internal transfers?

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

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

II-20. **TRADE DATA / SCOPE PVA**--Report your firm's production capacity, production, shipments, inventories, and employment related to the production of scope PVA in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet and on page 2 of this questionnaire.)

**Please note that the quantity is requested in thousands of pounds (1,000 pounds).**

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
Average production capacity <sup>1</sup> (quantity)					
Beginning-of-period inventories (quantity)					
Production (quantity)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity of commercial shipments					
Value of commercial shipments					
<b>Internal consumption:</b>					
Quantity of internal consumption					
Value <sup>2</sup> of internal consumption					
<b>Transfers to related firms:</b>					
Quantity of transfers					
Value <sup>2</sup> of transfers					
<b>Export shipments:<sup>3</sup></b>					
Quantity of export shipments					
Value of export shipments					
End-of-period inventories <sup>4</sup> (quantity)					
<b>Channels of distribution:</b>					
U.S. shipments to distributors (quantity)					
U.S. shipments to end users (quantity)					
<b>Employment data:</b>					
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (value)					
<sup>1</sup> The production capacity (see definitions in instruction booklet) reported is based on operating ___ hours per week, ___ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity (use additional pages as necessary).					
<sup>2</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, etc.) and provide value data using that basis for each of the periods noted above:					
<sup>3</sup> Identify your principal export markets: _____					
<sup>4</sup> Reconciliation of data.--Please note that the <b>quantities</b> reported above should reconcile as follows: beginning-of-period inventories, plus production, less total shipments, equals end-of-period inventories. Do the data reported reconcile?					
<input type="checkbox"/> Yes <input type="checkbox"/> No--Please explain: _____					

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

II-21. **TRADE DATA / PVB-GRADE PVA.**--Report your firm's production capacity, production, shipments, inventories, and employment related to the production of PVB-grade PVA in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet and on page two of this questionnaire.)

Please note that the quantity is requested in thousands of pounds (1,000 pounds).

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
<b>Average production capacity</b> <sup>1</sup> (quantity)					
<b>Beginning-of-period inventories</b> (quantity)					
<b>Production</b> (quantity)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity of commercial shipments					
Value of commercial shipments					
<b>Internal consumption:</b>					
Quantity of internal consumption					
Value <sup>2</sup> of internal consumption					
<b>Transfers to related firms:</b>					
Quantity of transfers					
Value <sup>2</sup> of transfers					
<b>Export shipments:</b> <sup>3</sup>					
Quantity of export shipments					
Value of export shipments					
<b>End-of-period inventories</b> <sup>4</sup> (quantity)					
<b>Channels of distribution:</b>					
U.S. shipments to distributors (quantity)					
U.S. shipments to end users (quantity)					
<b>Employment data:</b>					
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (value)					
<sup>1</sup> The production capacity (see definitions in instruction booklet) reported is based on operating ___ hours per week, ___ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity (use additional pages as necessary).					
<sup>2</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, etc.) and provide value data using that basis for each of the periods noted above:					
<sup>3</sup> Identify your principal export markets: _____					
<sup>4</sup> Reconciliation of data.--Please note that the <b>quantities</b> reported above should reconcile as follows: beginning-of-period inventories, plus production, less total shipments, equals end-of-period inventories. Do the data reported reconcile?					
<input type="checkbox"/> Yes <input type="checkbox"/> No--Please explain: _____					

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

II-22. **HYDROLYSIS RANGES.**--Please list your firm's shipment quantities of the following hydrolysis ranges of scope PVA during the specified periods. Total reported shipment as shown below should equal total shipment reported by your firm in question II-20.

<b>(Quantity in 1,000 pounds)</b>					
<b>Item</b>	<b>Calendar years</b>			<b>January-June</b>	
	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2009</b>	<b>2010</b>
<b>U.S. internal consumption/transfers to related firms</b>					
Greater than or equal to 97%					
Greater than 85% but less than 97%					
Greater than 80% but less than or equal to 85%					
Total					
<b>U.S. commercial shipments</b>					
Greater than or equal to 97%					
Greater than 85% but less than 97%					
Greater than 80% but less than or equal to 85%					
Total					
<b>Export shipments (commercial/transfers)</b>					
Greater than or equal to 97%					
Greater than 85% but less than 97%					
Greater than 80% but less than or equal to 85%					
Total					

II-23. If you reported exports in response to either question II-20 or II-21, please explain the reason for any disparity, if any exists, between your firm's export average unit values (value/quantity) and your firm's domestic commercial shipments average unit values.

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

II-24. **END-USE APPLICATION.**--Please list the end use application(s) for the PVA produced by your firm in 2009. (If more than one application is listed, please estimate the volume (in 1,000 pounds) and the share of the total production for each end use). **Total reported production as shown below should equal total production reported by your firm in questions II-20 and II-21.**

End-use application	Volume (in 1,000 pounds)	Share (in percent) of 2009 production
Adhesives		
Building materials		
Emulsion polymerization		
Paper		
Pharmaceuticals		
PVB		
Textile		
Other		
Other		
Unknown		
Total		

II-25a. At any time since January 1, 2007, has your firm produced PVA in fiber form?

- No     Yes-Indicate the amounts (in 1,000 pounds) of PVA in fiber form that your firm produced in 2009.

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II-25b. At any time since January 1, 2007, has your firm produced low-hydrolysis PVA (polyvinyl alcohol hydrolyzed at 80 percent or below)?

- No     Yes-Indicate the amounts (in 1,000 pounds) of low-hydrolysis PVA that your firm produced in 2009.

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

II-26. **PURCHASES / SCOPE PVA**.--Other than direct imports, has your firm otherwise purchased scope PVA since January 1, 2007? (See definitions in the instruction booklet and page two of this questionnaire.)

No                       Yes--Report such purchases below for the specified periods.<sup>1</sup>

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
<b>PURCHASES FROM U.S. IMPORTERS<sup>2</sup> OF PRODUCT FROM--</b>					
<b>TAIWAN:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>ALL OTHER COUNTRIES:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>PURCHASES FROM DOMESTIC PRODUCERS:<sup>3</sup></b>					
<i>Quantity</i>					
<i>Value</i>					
<b>PURCHASES FROM OTHER SOURCES:<sup>4</sup></b>					
<i>Quantity</i>					
<i>Value</i>					
<sup>1</sup> Please indicate your reasons for purchasing this product. If your reasons differ by source, please elaborate. <hr/>					
<sup>2</sup> Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier. <hr/>					
<sup>3</sup> Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier. <hr/>					
<sup>4</sup> Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier. <hr/>					

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

II-27. **PURCHASES / PVB-GRADE PVA.**--Other than direct imports, has your firm otherwise purchased PVB-grade PVA since January 1, 2007? (See definitions in the instruction booklet and page two of this questionnaire).

- No                       Yes--Report such purchases below for the specified periods.<sup>1</sup>

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
<b>PURCHASES FROM U.S. IMPORTERS<sup>2</sup> OF PRODUCT FROM--</b>					
<b>TAIWAN:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>ALL OTHER COUNTRIES:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>PURCHASES FROM DOMESTIC PRODUCERS:<sup>3</sup></b>					
<i>Quantity</i>					
<i>Value</i>					
<b>PURCHASES FROM OTHER SOURCES:<sup>4</sup></b>					
<i>Quantity</i>					
<i>Value</i>					
<sup>1</sup> Please indicate your reasons for purchasing this product. If your reasons differ by source, please elaborate. <hr/>					
<sup>2</sup> Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier. <hr/>					
<sup>3</sup> Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier. <hr/>					
<sup>4</sup> Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier. <hr/>					

II-28. **Production process.**—Please indicate the type of production process that your firm currently uses to produce PVA in the United States:

- Continuous belt process
- Reactor process
- Other (indicate and explain) \_\_\_\_\_

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

**II-29. COMPARABILITY OF SCOPE PVA AND PVB-GRADE PVA.–**

Please describe the **differences and similarities between scope PVA and PVB-grade PVA** with respect to the following factors: (a) **characteristics and uses**--describe the differences and similarities in the physical characteristics and end uses; (b) **interchangeability**--discuss the interchangeability in end use of the two products; (c) **manufacturing processes**--describe the two processes; (d) **channels of distribution**--describe the specific end use/customer requirements and channels of distribution/market situation in which the products are sold; (e) **customer and producer perceptions**--describe any perceived differences in the two products (e.g., sales/marketing practices); and (f) **price**--provide a discussion and specific examples of prices for the two products. Use additional pages as necessary.

**(a) Characteristics and uses:**

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**(b) Interchangeability:**

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**(c) Manufacturing processes:**

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**(d) Channels of distribution:**

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**(e) Customer and producer perceptions:**

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**(f) Price:**

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**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Charles Yost (202-205-3432, charles.yost@usitc.gov).

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

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

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

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

A. When does your fiscal year end (month and day)? \_\_\_\_\_  
 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 PVA:

2. Does your firm prepare profit/loss statements for PVA:  
 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 PVA, 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, etc.).

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

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

<u>Products</u>	<u>Share of sales</u>
Scope PVA _____	_____
PVB-grade PVA _____	_____
PVA in fiber form _____	_____
Low-hydrolysis PVA _____	_____
Other (specify) _____	_____

III-6. **Inputs from related firms.**--Does your firm receive inputs (raw materials, labor, energy, or any other services) used in the production of PVA from any related firm?

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

III-7. **Inputs from related firms.**--With respect to the related companies identified in response to question III-6 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-8 below.       No--Continue to question III-10 below.

III-8. **Inputs from related firms.**--In the space provided below, identify the inputs used in the production of PVA 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-9. **Inputs from related firms at cost.**--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 questions III-11 and III-12 (i.e., costs reported in questions III-11 and III-12, 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 Charles Yost (202-205-3432, charles.yost@usitc.gov).

III-10. **Nonrecurring charges.**--For each annual and interim period for which financial results are reported in questions III-11 and III-12, please indicate in the schedule below the specific nonrecurring charges, the particular expense/cost line items from question III-11 where the associated charges are included, a brief description of the charges, and the associated values (*in \$1,000*). Nonrecurring charges would include, but are not limited to, items such as asset write-offs and accelerated depreciation due to restructuring of the company's PVA operations.

Item	Fiscal years ended--			January-June	
	_____	_____	_____	2009	2010
<b>Non-recurring charges:</b> (In this column please provide a brief description of each nonrecurring charge and indicate the particular expense/cost line items where the associated charges are included in questions III-10 and III-11.)					
1.					
2.					
3.					
4.					
5.					
6.					
7.					

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

III-11. **COMMERCIAL-ONLY OPERATIONS / SCOPE PVA**-- Report the revenue and related cost information requested below on the commercial-only PVA operations of scope PVA produced in your U.S. establishment(s).<sup>1</sup> In other words, report only sales to unrelated parties. Include both domestic and export sales of scope PVA, but do not report resales of purchased scope PVA. With respect to cost of goods sold, we are requesting that you first report the gross amount of its three components – raw materials, direct labor, and other factory costs – and then reduce the sum of these amounts by the fair market value of your by-product revenues. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee) please contact Charles Yost (202-205-3432) before completing this section of the questionnaire.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Fiscal years ended--			January-June	
	_____	_____	_____	2009	2010
<b>Net Commercial sales quantity<sup>1</sup></b>					
<b>Net Commercial sales value<sup>1</sup></b>					
<b>Cost of goods sold (COGS):</b>					
Raw materials					
Direct labor					
Other factory costs					
Subtotal					
Less: By-product revenue <sup>2</sup>					
Equals: net cost of goods sold					
<b>Gross profit or (loss)</b>					
<b>Selling, general, and administrative (SG&amp;A) expenses:</b>					
<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> Less discounts, returns, allowances, and prepaid freight. If your firm's fiscal year ends on December 31, the quantities and values should equal the corresponding shipment quantities and values reported in Part II of this questionnaire.

<sup>2</sup> By-product revenue should be reported on a fair market value basis.

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

III-12. **COMMERCIAL-ONLY OPERATIONS / PVB-GRADE PVA.**-- Report the revenue and related cost information requested below on the commercial-only PVA operations of PVB-grade PVA produced in your U.S. establishment(s).<sup>1</sup> In other words, report only sales to unrelated parties. Include both domestic and export sales of PVB-grade PVA, but do not report resales of purchased PVB-grade PVA. With respect to cost of goods sold, we are requesting that you first report the gross amount of its three components – raw materials, direct labor, and other factory costs – and then reduce the sum of these amounts by the fair market value of your by-product revenues. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee) please contact Charles Yost (202-205-3432) before completing this section of the questionnaire.

<b>Quantity (in 1,000 pounds) and value (in \$1,000)</b>					
<b>Item</b>	<b>Fiscal years ended--</b>			<b>January-June</b>	
	_____	_____	_____	<b>2009</b>	<b>2010</b>
<b>Net Commercial sales quantity<sup>1</sup></b>					
<b>Net Commercial sales value<sup>1</sup></b>					
<b>Cost of goods sold (COGS):</b>					
Raw materials					
Direct labor					
Other factory costs					
Subtotal					
Less: By-product revenue <sup>2</sup>					
Equals: net cost of goods sold					
<b>Gross profit or (loss)</b>					
<b>Selling, general, and administrative (SG&amp;A) expenses:</b>					
<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> Less discounts, returns, allowances, and prepaid freight. If your firm's fiscal year ends on December 31, the quantities and values should equal the corresponding shipment quantities and values reported in Part II of this questionnaire.

<sup>2</sup> By-product revenue should be reported on a fair market value basis.

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

III-13. **TOTAL OPERATIONS / SCOPE PVA**-- Report the revenue and related cost information requested below on all of the scope PVA your firm produced in its U.S. establishment(s), whether the scope PVA was sold to unrelated parties, internally consumed to produce another product, or transferred to a related party. If you reported commercial sales of scope PVA in table III-11, please include those sales in this table. Include both domestic and export sales of scope PVA, but do not report resales of purchased scope PVA. With respect to cost of goods sold, we are requesting that you first report the gross amount of its three components – raw materials, direct labor, and other factory costs – and then reduce the sum of these amounts by the fair market value of your by-product revenues. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee) please contact Charles Yost (202-205-3432) before completing this section of the questionnaire.

<b>Quantity (in 1,000 pounds) and value (in \$1,000)</b>					
<b>Item</b>	<b>Fiscal years ended--</b>			<b>January-June</b>	
	_____	_____	_____	<b>2009</b>	<b>2010</b>
<b>Net sales quantities:<sup>1</sup></b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities					
<b>Net sales values:<sup>1</sup></b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values					
<b>Cost of goods sold (COGS):</b>					
Raw materials					
Direct labor					
Other factory costs					
Subtotal					
Less: By-product revenue <sup>2</sup>					
Equals: net cost of goods sold					
<b>Gross profit or (loss)</b>					
<b>Selling, general, and administrative (SG&amp;A) expenses:</b>					
<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> Less discounts, returns, allowances, and prepaid freight. If your firm's fiscal year ends on December 31, the quantities and values should equal the corresponding shipment quantities and values reported in Part II of this questionnaire.

<sup>2</sup> By-product revenue should be reported on a fair market value basis.

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

III-14. **TOTAL OPERATIONS / PVB-GRADE PVA.**-- Report the revenue and related cost information requested below on all of the PVB-grade PVA your firm produced in its U.S. establishment(s), whether the PVB-grade PVA was sold to unrelated parties, internally consumed to produce another product, or transferred to a related party. If you reported commercial sales of PVB-grade PVA in table III-12, please include those sales in this table. Include both domestic and export sales of PVB-grade PVA, but do not report resales of purchased PVB-grade PVA. With respect to cost of goods sold, we are requesting that you first report the gross amount of its three components – raw materials, direct labor, and other factory costs – and then reduce the sum of these amounts by the fair market value of your by-product revenues. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee) please contact Charles Yost (202-205-3432) before completing this section of the questionnaire.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Fiscal years ended--			January-June	
	_____	_____	_____	2009	2010
<b>Net sales quantities:<sup>1</sup></b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities					
<b>Net sales values:<sup>1</sup></b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values					
<b>Cost of goods sold (COGS):</b>					
Raw materials					
Direct labor					
Other factory costs					
Subtotal					
Less: By-product revenue <sup>2</sup>					
Equals: net cost of goods sold					
<b>Gross profit or (loss)</b>					
<b>Selling, general, and administrative (SG&amp;A) expenses:</b>					
<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> Less discounts, returns, allowances, and prepaid freight. If your firm's fiscal year ends on December 31, the quantities and values should equal the corresponding shipment quantities and values reported in Part II of this questionnaire.

<sup>2</sup> By-product revenue should be reported on a fair market value basis.

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

III-15. **Asset values.**--Report the total assets associated with the production, warehousing, and sale of all of the PVA produced in your U.S. establishment(s), whether it was sold commercially, internally consumed to produce another product, or transferred to a related party. 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. Provide data as of the end of 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 product:</b>			
<b>1. Current assets:</b>			
A. Cash and equivalents			
B. Accounts receivable, net			
C. Inventories			
D. Other (describe: _____)			
E. Total current assets (lines 1.A. through 1.D.)			
<b>2. Property, plant, and equipment</b>			
A. Original cost of property, plant, and equipment			
B. Less: Accumulated depreciation			
C. Equals: Book value of property, plant, and equipment			
<b>3. Other (describe: _____)</b>			
<b>4. Total assets</b> (lines 1.E., 2.C., and 3)			

III-16. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and the research and development expenses associated with the PVA produced in your U.S. establishment(s), whether it was sold commercially, internally consumed to produce another product, or transferred to a related party. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods. Please describe below if any of these expenditures were specific to scope PVA or PVB-grade PVA. (See definitions in the instruction booklet and page two of this questionnaire).

Value (in \$1,000)					
Item	Fiscal years ended--			January-June	
	_____	_____	_____	2009	2010
<b>Capital expenditures</b>					
<b>Research and development expenses</b>					

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

III-17. **Effects of imports**--Since January 1, 2007, 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 scope PVA from Taiwan?

- 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-18. **Anticipated effects of imports**--Does your firm anticipate any negative impact of imports of scope PVA from Taiwan?

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

Further information on this part of the questionnaire can be obtained from Gerry Benedick (202-205-3244, [gerald.benedick@usitc.gov](mailto:gerald.benedick@usitc.gov))

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

Company contact:

\_\_\_\_\_

( )

\_\_\_\_\_

\_\_\_\_\_

**PRICE DATA**

This section requests quarterly selling quantity and value data during January 2007-June 2010 for your firm's U.S. commercial shipments of the following scope PVA products that it produced domestically and shipped (**in bags**) to U.S. **end users** unrelated to your firm by ownership. *Do NOT include bulk shipments in rail cars.*

*Product 1.—Scope PVA for use in adhesive applications with a range of hydrolysis between 80-89 percent, a viscosity between 3-6 (centipois), standard granular particle size, and non-tackified*

*Product 2.—Scope PVA for use in adhesive applications with a range of hydrolysis between 80-89 percent, a viscosity between 20-39 (centipois), standard granular particle size, and non-tackified*

*Product 3.—Scope PVA for use in adhesive applications with a range of hydrolysis between 80-89 percent, a viscosity between 40-70 (centipois), standard granular particle size, and non-tackified*

*Product 4.—Scope PVA for use in paper applications with a range of hydrolysis between 98-99 percent, a viscosity between 3-12 (centipois), standard granular particle size, and non-tackified*

*Product 5.—Scope PVA for use in textile applications with a range of hydrolysis between 87-97 percent, a viscosity between 12-39 (centipois), standard granular particle size, and non-tackified*

Please note that quarterly dollar selling values should be on a f.o.b. U.S. point(s)-of-shipment basis (including those shipped directly from your U.S. plant(s) and from your U.S. warehouse(s)) and should not include U.S.-inland transportation costs to your end-user customers. For any sales that were on a delivered basis, deduct from the delivered price all such U.S.-inland freight to your end-user customers and report the resulting effective f.o.b. U.S. sales values (*do not report transactions where you cannot report values, either actual or adjusted, on a f.o.b. basis*). Report the U.S. f.o.b. sales value and quantity data NET of returns, discounts, allowances, and rebates; also deduct any U.S. freight costs to your customers' receiving points that were absorbed by your firm (i.e., not charged to your customers). *See instruction booklet.*

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

IV-2. **Pricing data.**--Report below the quarterly price data<sup>1</sup> for the pricing products<sup>2</sup> produced and sold (in bags) by your firm to end users.

<b>(Quantity in pounds, value in dollars)</b>						
<b>Period of shipment</b>	<b>Product 1</b>		<b>Product 2</b>		<b>Product 3</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<b>2007:</b>						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
<b>2008:</b>						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
<b>2009:</b>						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
<b>2010:</b>						
Jan-Mar						
Apr-June						

<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(s) of shipment; the latter actual or adjusted.

<sup>2</sup> Pricing product definitions are provided on the first page of Part 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: \_\_\_\_\_

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

IV-2. **Pricing data.**—Continued

<b>(Quantity in pounds, value in dollars)</b>				
<b>Period of shipment</b>	<b>Product 4</b>		<b>Product 5</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<b>2007:</b>				
January-March				
April-June				
July-September				
October-December				
<b>2008:</b>				
January-March				
April-June				
July-September				
October-December				
<b>2009:</b>				
January-March				
April-June				
July-September				
October-December				
<b>2010:</b>				
January-March				
April-June				
<sup>1</sup> Net values ( <i>i.e.</i> , gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point(s) of shipment; the latter actual or adjusted. <sup>2</sup> Pricing product definitions are provided on the first page of Part IV.				
<b>Note.</b> --If your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:				
Product 4:				
Product 5:				

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

IV-3. **Pricing products.--**

a) **Price fluctuations.--**Please review your firm's reported selling price data and note, by specified product, where there are unusual/sharp price differences among adjacent quarters. Provide an explanation below and identify the periods and product number associated with each such explanation.

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b) **Product composition.--** For each of the products for which your firm reported pricing data for its U.S.-produced scope PVA in response to question IV-2 and for each quarter during January-June 2010, please report the range of selling prices (lowest and highest in dollars per pound) for that quarter and product. In addition, please explain the reason(s) for any price range within a single product category.

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c) **Price aggregation.--** Please discuss below the appropriateness of comparing reported price data for the specified scope PVA products produced domestically, imported from Taiwan, and imported from nonsubject countries based on aggregated country prices for all reporting U.S. producers and all reporting importers (the latter for each country reported).

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

IV-4. **Price comparisons among countries.**--Please compare market prices of scope PVA in the United States vis-a-vis market prices of scope PVA in Taiwan, and, if known, in individual third-country markets during January 2007-June 2010. Provide the bases for any price comparisons (f.o.b., delivered, etc.), and note the specific information as to price levels, products, time periods, and countries for any price comparisons.

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**Unless otherwise instructed, please answer questions in the rest of Part IV based on your firm's total U.S. sales of its U.S.-produced scope PVA to all U.S. customers during January 2007-June 2010. If your responses differ by sales to different types of U.S. customers (distributors, end users, or types of distributors/end users), by product specifications of the scope PVA that you produce domestically, or for any other reasons, please note such differences.**

IV-5. **Sales of bagged versus bulk PVA.**--Please report below the total quantities of your firm's U.S. commercial shipments of its U.S.-produced scope PVA that were in bags and in bulk during 2009.

Bagged (in 1,000 pounds): \_\_\_\_\_

Bulk (in 1,000 pounds): \_\_\_\_\_

Please indicate whether average f.o.b. selling prices (in dollars per pound) for bulk shipments were lower, higher, about the same, or varied in comparison with bagged shipments in 2009.

Lower       Higher       Same       Varied

If different/varied, by what percentage, based on the average price of the bagged shipments, was the average price of the bulk shipments different/varied? Please explain.

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

IV-6. **PVA grades/types.**—

a) Please identify below the principal factors considered in determining the grade of scope PVA (e.g., degree of hydrolysis, viscosity, etc.).

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b) Please use the following definitions of standard and specialty scope PVA products in responding to IV-6c below:

Standard grades—Products with a hydrolysis level of 85 percent or higher, and a 4 percent solution viscosity of less than 75cP. This includes multi-component blends of products with these characteristics but excludes any copolymer modified products.

Specialty grades—Products with a hydrolysis level lower than 85 percent OR with a 4 percent solution viscosity greater than 75cP OR with any kind of copolymer (either grafted or copolymerized).

c) Please report below the quantities of your firm's U.S. commercial shipments of its U.S.-produced scope PVA that were standard and specialty products during 2009.

Standard products (*in 1,000 pounds*): \_\_\_\_\_

Specialty products (*in 1,000 pounds*): \_\_\_\_\_

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

IV-7. **Announced price changes.**—Please report below the chronology of your firm's announced price changes for U.S. sales of its U.S.-produced scope PVA during January 2007-June 2010. For each price change (increase or decrease) identify the direction and amount of change, the date of the price change, the extent to which the price change held, and the reason(s) for the price change. *Copy this page as needed to complete your response.*

**Price increase (+)/decrease (-):** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Extent held and reason(s):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Price increase (+)/decrease (-):** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Extent held and reason(s):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Price increase (+)/decrease (-):** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Extent held and reason(s):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Price increase (+)/decrease (-):** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Extent held and reason(s):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Price increase (+)/decrease (-):** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Extent held and reason(s):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Price increase (+)/decrease (-):** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Extent held and reason(s):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



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

IV-8. **Length of sales period.**--Please estimate below the share of your firm's total U.S. commercial shipment quantity during 2009 of its U.S.-produced scope PVA that was on a (1) long-term basis (multiple deliveries for more than 12 months after the sales agreement), (2) short-term basis (multiple deliveries up to and including 12 months), and (3) spot sales basis (usually one-time delivery, within 30 days of the sales agreement). The three different sales bases include both oral agreements and written contracts.

<b>Type of sale</b>	<b>Share of 2009 U.S. commercial shipment quantity (percent)</b>
<b>Long-term</b>	_____
<b>Short-term</b>	_____
<b>Spot</b>	_____
<b>TOTAL</b>	<u>100 percent</u>

IV-9. **Long-term sales provisions.**--Please answer the following questions with respect to your firm's sales of its U.S.-produced scope PVA on a typical long-term basis during January 2007-June 2010.

(a) What was the average duration of an agreement/contract? \_\_\_\_\_

(b) Could prices be renegotiated during the agreement/contract period?  Yes  No

(c) Did the agreement/contract fix quantity, price, or both?  Quantity  Price  Both

(d) Did the agreement/contract have a meet-or-release provision?  Yes  No

IV-10. **Short-term sales provisions.**--Please answer the following questions with respect to your firm's sales of its U.S.-produced scope PVA on a typical short-term basis during January 2007-June 2010.

(a) What was the average duration of an agreement/contract? \_\_\_\_\_

(b) Could prices be renegotiated during the agreement/contract period?  Yes  No

(c) Did the agreement/contract fix quantity, price, or both?  Quantity  Price  Both

(d) Did the agreement/contract have a meet-or-release provision?  Yes  No

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

**IV-11. Supply contracts.—**

a) Please provide the following information involving your firm's U.S.-produced PVA for each your firm's top four completed U.S. supply contracts that involved at least some delivery during 2010. Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

**Customer:** \_\_\_\_\_

**Contract date (or indicate under negotiation (N)):** \_\_\_\_\_

**Contract length and period (beginning and ending dates):** \_\_\_\_\_

**Minimum and maximum quantities (in 1,000 pounds) to be delivered:**

*Minimum quantity* \_\_\_\_\_                      *Maximum quantity* \_\_\_\_\_

**Percentage change in base price of current contract from base price in the preceding contract with this firm (note date of preceding contract):**

*Percentage change* \_\_\_\_\_                      *Date of earlier contract* \_\_\_\_\_

**Price escalator terms:** \_\_\_\_\_

**Other principal terms:** \_\_\_\_\_

**Customer:** \_\_\_\_\_

**Contract date (or indicate under negotiation (N)):** \_\_\_\_\_

**Contract length and period (beginning and ending dates):** \_\_\_\_\_

**Minimum and maximum quantities (in 1,000 pounds) to be delivered:**

*Minimum quantity* \_\_\_\_\_                      *Maximum quantity* \_\_\_\_\_

**Percentage change in base price of current contract from base price in the preceding contract with this firm (note date of preceding contract):**

*Percentage change* \_\_\_\_\_                      *Date of earlier contract* \_\_\_\_\_

**Price escalator terms:** \_\_\_\_\_

**Other principal terms:** \_\_\_\_\_

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

**IV-11. Supply contracts.—Continued**

b) Please provide information about the history and status of each ongoing negotiation that involves your firm's sales of its U.S.-produced PVA. Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

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**IV-12. Price setting.-- How did your firm determine the prices that it charged for sales during January 2007-June 2010 of its U.S.-produced scope PVA (*check all that apply*)?**

- Transaction-by-transaction                       Contracts  
 Set price lists (if checked, include a copy of a recent price list)  
 Reverse internet auction sales  
 Other--Please describe: \_\_\_\_\_

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**IV-13. Discount policy/practice.-- Please indicate and describe your firm's discount policies/practices (*check all that apply*) involving sales during January 2007-June 2010 of its U.S.-produced scope PVA; include in your discussion any discounts applied to scope PVA bundled with other products your firm sells (explain below). Please include discounts that your firm offered even though it may not have a stated discount policy. The one exception--do NOT include any payment discounts covered in IV-14a.**

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

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**IV-14. Pricing terms for PVA.--Report below for your firm's U.S. commercial shipments during January 2007-June 2010 of its U.S.-produced scope PVA.**

- (a) What were your firm's typical sales terms (*e.g.*, 2/10 net 30 days)? \_\_\_\_\_  
(b) On what basis were your prices usually quoted? (Check one)  
 F.o.b.--Please specify shipping point: \_\_\_\_\_                       Delivered

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

IV-15. **Shipping information.**-- Report below for your firm's U.S. commercial shipments during January 2007-June 2010 of its U.S.-produced scope PVA.

- (a) What was the approximate percentage of the total delivered price that was accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent.
- (b) Who generally arranged the transportation to your customers' locations? (Check one)  
 Your firm                       Purchaser.
- (c) What proportion of your sales was delivered within 100 miles of your production facility? \_\_\_\_\_ percent. Within 101 to 1,000 miles? \_\_\_\_\_ percent. Over 1,000 miles? \_\_\_\_\_ percent.

IV-16. **Lead times.**--What was your firm's share of its 2009 U.S. commercial shipments of its domestically produced scope PVA from inventory and produced to order and what was the average lead time between customers' orders and the date of delivery?

<u>Source</u>	<u>Share of U.S. commercial shipments in 2009 (Percent)</u>	<u>Lead time (days)</u>
From inventory	_____	_____
Produced to order	_____	_____
<b>Total</b>	<b>100 %</b>	

IV-17. **Geographical shipments.**-- What was the geographic market area in the United States served by your firm's U.S. shipments during January 2007-June 2010 of its U.S.-produced scope PVA? (Check all that apply)

Geographic area	√ if applicable
<b>Northeast.</b> --CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
<b>Midwest.</b> --IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
<b>Southeast.</b> --AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
<b>Central Southwest.</b> --AR, LA, OK, and TX.	<input type="checkbox"/>
<b>Mountains.</b> --AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
<b>Pacific Coast.</b> --CA, OR, and WA.	<input type="checkbox"/>
<b>Other.</b> --All other markets in the United States not previously listed, including AK, HI, PR, VI, among others.	<input type="checkbox"/>

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

IV-18. **Product/marketing changes.**--Have there been any significant changes in the product range, product mix, or marketing (including sales over the internet) of scope PVA in the United States during January 2007-June 2010?

No             Yes

If yes, please describe and quantify if possible. Discuss the time periods any such changes occurred, and the impact of any such changes on your firm's U.S. sales prices and quantities of its U.S.-produced scope PVA.

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IV-19. **End uses.**--Based on your firm's U.S. sales during January 2007-June 2010 of its U.S.-produced PVA, identify the principal direct downstream products associated with such sales and, to the extent possible, report the approximate percentage share of the total cost to produce each downstream product that was accounted for by the subject product. Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA             PVB-grade PVA    (Check one)

<u>Downstream product</u>	<u>Share of total cost (percent)</u>
_____	_____
_____	_____
_____	_____
_____	_____

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

IV-20. **Variable and fixed costs.**--Specify for your firm's U.S. production of scope PVA during 2009 the approximate percentage share of total U.S. production costs that was variable and the share that was fixed; also identify the specific costs that your firm considers variable and considers fixed.

*Variable costs:*

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*Fixed costs:*

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Please describe below what determines which costs are variable and which are fixed by your firm.

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IV-21. **Raw materials.**--Please describe any trends in the prices of raw materials, particularly natural gas/ethane, used by your firm to produce scope PVA during January 2007-June 2010 and whether your firm expects these trends to continue.

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

IV-22. **Supply constraints.**--Has your firm refused, declined, or been unable to supply its U.S.-produced PVA since January 1, 2007 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)? Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

No                       Yes-- Please fill in the table.

Type of supply constraint	When this occurred	Which purchasers were affected by the constraint	Why did the supply constraint occur
1.			
2.			
3.			

IV-23. **Cyclical/seasonal U.S. demand.**—Was total U.S. demand for PVA subject to any cyclical/seasonal fluctuations, product cycles, or other U.S. conditions of competition distinctive to PVA during January 2007-June 2010? Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

No                       Yes

If yes—

(a) Please check below the type(s) of demand fluctuations and then discuss the nature and timing of these fluctuations during January 2007-June 2010. In addition indicate whether any business cycles result from changes in the overall economy and/or specific downstream sectors.

Cyclical (longer than one year for complete cycle)

Seasonal (within one year for complete cycle)

Product cycle (completed  within one year, or  longer than one year—Check one)

Other competitive condition(s) (specify \_\_\_\_\_)

Discussion: --In addition, identify, if applicable, peak and lowest demand months in a year.

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

**IV-23. Cyclical/seasonal U.S. demand—Continued**

(b) Have there been any changes in the business cycles or conditions of competition in specific U.S. sectors using the applicable PVA or for total applicable PVA in the U.S. market since January 1, 2007?

No                       Yes-- Please describe.

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(c) Explain how any U.S. cyclical/seasonal/other demand fluctuations affected your firm's selling prices and shipment quantities of its U.S.-produced applicable PVA to the U.S. market at any time(s) during January 2007-June 2010.

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**IV-24. Demand trends.--**

(a) How did total demand WITHIN the United States for PVA change during January 2007-June 2010? What principal factors affected changes in demand? Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

Increased                       No Change                       Decreased                       Fluctuated

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

IV-24. **Demand trends.**--Continued

(b) How did demand OUTSIDE the United States (if known) for PVA change during January 2007-June 2010? What principal factors affected changes in demand? If applicable, identify specific foreign countries. Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

Increased                       No Change                       Decreased                       Fluctuated

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IV-25. **Market studies.**—Please provide as a separate attachment to this request any studies, surveys, etc., that you are aware of that quantify and/or otherwise discuss PVA demand and supply (the latter including production capacity and capacity utilization) in (1) the United States, (2) each of the major consuming countries, and (3) the world as a whole. Of particular interest is such data during January 2007-June 2010 and forecasts for the future.

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

**IV-26. Substitutes in demand in the U.S. market.—**

*Substitution in demand refers to products that can, based on market price considerations and household-consumer/industrial-user preferences or technical requirements, reasonably be expected to substitute for each other when the price of one product changes vis-a vis the price of the other product—some consumers/industrial users may require greater price changes than others before they switch among the alternative products.*

a) Do substitutes for PVA exist in the U.S. market? Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

No                       Yes

If yes, please list in descending order of importance any products, other than the applicable PVA, that may be substituted for the applicable PVA in the U.S. market during January 2007-June 2010. For each possible substitute product, please give examples of applications and end uses involving the substitute and indicate whether changes in the price of the substitute affect the price and/or quantity for the applicable PVA (also estimate the length of any time lag of such an effect).

<b>Substitute product</b>	<b>Description of applications and end uses</b>	<b>Have changes in the prices of this substitute affected the price and/or quantity of the applicable PVA during January 2007-June 2010?</b>
1.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
2.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
3.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
4.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
5.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>

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

**IV-26. Substitutes in demand in the U.S. market.—Continued**

b) Have there been any changes in the number or types of products that can be substituted for PVA or changes in the relative importance of existing substitutes during January 2007-June 2010? Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA             PVB-grade PVA    (Check one)

No             Yes--Please explain.

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

**IV-26. Substitutes in demand in the U.S. market.—Continued**

c) Do various grades/types of the applicable PVA substitute for each other in the U.S. market? Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA             PVB-grade PVA    (Check one)

No             Yes

If yes, please discuss below the extent to which the applicable PVA products could substitute for each other during January 2007-June 2010. Discuss substitution of the applicable PVA of different hydrolysis, viscosity, and other features and the end use/applications with any such substitution. For each possible substitution discussed, please indicate the extent to which any such substitution actually occurred during January 2007-June 2010.

***Different hydrolysis:***

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***Different viscosities:***

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***Other factor differences (specify):*** \_\_\_\_\_

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

IV-29. **Customer Identification--** Please identify below the names and addresses of your firm's 10 largest U.S. customers during January 2007-June 2010 for its U.S.-produced PVA (for each customer identify with a D for distributor and EU for enduser). For each such customer, please also provide the name and telephone number of a contact person and provide the share of the quantity of your firm's total U.S. commercial shipments of PVA that each of these customers accounted for in 2009. Answer separately for each applicable PVA form and *copy this question as needed to complete your response.*

Scope PVA                       PVB-grade PVA      (Check one)

No.	Customer's name	Customer type (D or EU)	Street address (not P.O. box), city, state, and zip code	Contact person	Area code and telephone number	Share of 2009 commercial shipments (%)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						





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

**IV-31. COMPETITION FROM IMPORTS--LOST SALES. --PLEASE DO NOT RE-SUBMIT ALLEGATIONS PROVIDED IN THE PRELIMINARY PHASE OF THIS INVESTIGATION.**

Since January 1, 2007: Did your firm lose sales of scope PVA to imports of scope PVA from Taiwan?

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.

- 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 (in 1,000 pounds)	Rejected U.S. price (total value-- dollars)	Country of origin	Competing import price (total value— dollars)