

U.S. IMPORTERS' QUESTIONNAIRE

WALK-BEHIND LAWN MOWER FROM CHINA AND VIETNAM

This questionnaire must be received by the Commission by **March 19, 2021**

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty investigation concerning imports of walk-behind lawn mowers from China and the antidumping investigations concerning walk-behind lawn mowers from China and Vietnam (Inv. Nos. 701-TA-648 and 731-TA-1521-1522 (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 firm's possession (19 U.S.C. § 1333(a)).

Name of firm _____

Address _____

City _____ State _____ Zip Code _____

Website _____

Has your firm imported walk-behind lawn mowers (as defined on next page), regardless of the origin of the contained small vertical engine, from any country at any time since January 1, 2018?

☐ **NO** (Sign the certification below and promptly return **only** this page of the questionnaire to the Commission)

☐ **YES** (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)

Return questionnaire via the U.S. International Trade Commission **Drop Box** by clicking on the following link: <https://dropbox.usitc.gov/oinv/>. (PIN: **XXXX**)

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 proceedings conducted by the Commission on the same or similar merchandise.

I, the undersigned, acknowledge that information submitted in response to this request for information and throughout this proceeding or other proceedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. I understand that all contract personnel will sign appropriate nondisclosure agreements.

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background.-- This proceeding was instituted in response to petitions filed on May 26, 2020, by MTD Products Inc., Valley City, Ohio. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination(s) of injury, threat, or material retardation, and if the U.S. Department of Commerce (“Commerce”) makes an affirmative determination(s) of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at:
https://usitc.gov/investigations/701731/2020/walk_behind_lawn_mowers_china_and_vietnam/Final.htm

Walk-behind lawn mowers covered by this investigation consists of certain rotary walk-behind lawn mowers, which are grass-cutting machines that are powered by internal combustion engines. The scope of the investigation covers certain walk-behind lawn mowers, whether self-propelled or non-self-propelled, whether finished or unfinished, whether assembled or unassembled, and whether containing any additional features that provide for functions in addition to mowing.

Walk-behind lawn mowers within the scope of this investigation are only those powered by an internal combustion engine with a power rating of less than 3.7 kilowatts (kw). These internal combustion engines are typically spark ignition, single or multiple cylinder, air cooled, internal combustion engines with vertical power take off shafts with a maximum displacement of 196cc. Walk-behind lawn mowers covered by this scope typically must be certified and comply with the Consumer Products Safety Commission (CPSC) Safety Standard For Walk-Behind Power Lawn Mowers under the 16 CFR Part 1205. However, lawn mowers that meet the physical descriptions above, but are not certified under 16 CFR Part 1205 remain subject to the scope of this proceeding.

The internal combustion engines of the lawn mowers covered by this scope typically must comply with and be certified under Environmental Protection Agency (EPA) air pollution controls title 40, chapter I, subchapter U, part 1054 of the Code of Federal Regulations standards for small non-road spark-ignition engines and equipment. However, lawn mowers that meet the physical descriptions above but that do not have engines certified under 40 CFR Part 1054 or other parts of subchapter U remain subject to the scope of this proceeding.

For purposes of this investigation, an unfinished and/or unassembled lawn mower means at a minimum, a sub-assembly comprised of an engine and a cutting deck shell attached to one another. A cutting deck shell is the portion of the lawn mower—typically of aluminum or steel—that houses and protects a user from a rotating blade. Importation of the subassembly whether or not accompanied by, or attached to, additional components such as a handle, blade(s), grass catching bag, or wheel(s) constitute an unfinished lawn mower for purposes of this investigation. The inclusion in a third country of any components other than the mower subassembly does not remove the lawn mower from the scope. Lawn mowers that meet the physical description above are covered by the scope of this investigation regardless of the origin of its engine, unless such lawn mowers contain an engine that is covered by the scope of the ongoing proceedings on certain vertical shaft engines between 99cc and up to 225cc, and parts thereof (“small vertical engines”) from China¹. If the proceedings on small vertical engines from China are terminated, the lawn mowers containing small vertical engines from China will be covered by the scope of this proceeding.

¹ For further detail see:

https://usitc.gov/investigations/701731/2020/small_vertical_shaft_engines_china/Final.htm

The lawn mowers subject to these investigations are typically imported under HTS subheading 8433.11.00 (statistical reporting number 8433.11.0050). Product subject to these investigations may also be imported under HTSUS 8407.90.1010 or 8433.90.1090. The HTSUS subheadings are provided for convenience and customs purposes only, and the written description of the merchandise under investigation is dispositive.

Verification.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

Release of information.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

Valid number error messages.--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Nitin Joshi (202-708-1669, nitin.joshi@usitc.gov).

D-GRIDS tool.--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage (https://www.usitc.gov/trade_remedy/question.htm) called the "D-GRIDS tool." Use of this tool to help your firm complete this questionnaire is optional. Firms opting to use the D-GRIDS tool to populate their data into this questionnaire will need the D-GRIDS specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDS tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDS tool are available within the D-GRIDS tool itself.

- I-1. **OMB statistics.**--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

| Hours | Dollars |
|-------|---------|
| | |

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 40 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please attach such comments to your response or send to the Office of Investigations, USITC, 500 E St. SW, Washington, DC 20436.

- I-2a. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire.

"Establishment"--Each facility of a firm involved in the importation of walk-behind lawn mowers, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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I-2b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

I-2c. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

| | |
|-------------------|--|
| Law firm: | |
| Lead attorney(s): | |

I-3. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

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

| Firm name | Country | Extent of ownership (percent) |
|-----------|---------|----------------------------------|
| | | |
| | | |
| | | |

I-4. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing walk-behind lawn mowers from China or Vietnam into the United States or that are engaged in exporting walk-behind lawn mowers from China or Vietnam to the United States?

☐ No ☐ Yes--List the following information.

| Firm name | Country | Affiliation |
|-----------|---------|-------------|
| | | |
| | | |
| | | |

- I-5. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of walk-behind lawn mowers?

☐ No ☐ Yes--List the following information.

| Firm name | Country | Affiliation |
|------------------|----------------|--------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

- I-6. **Importing operations.**--Please indicate the nature of your firm's importing operations of walk-behind lawn mowers. More than one answer may be applicable.

| Importer of record | Takes title to the imported product(s) | Consignee of the imported products(s) | Customs broker or freight forwarder |
|---------------------------|---|--|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- I-7. **Consignee.**--If your firm is an importer of record of walk-behind lawn mowers but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

| Firm name | Address | Contact person and phone number |
|------------------|----------------|--|
| | | |
| | | |
| | | |

- I-8. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters walk-behind lawn mowers into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports walk-behind lawn mowers under the TIB (temporary importation under bond) program.

“Foreign trade zone” is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise, as well as other savings. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

“Bonded warehouse” is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

“Temporary Importation under Bond (“TIB”) program” is a procedure whereby imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule of the United States (HTS).

| Item | No | Yes |
|----------------------------------|--------------------------|--------------------------|
| Foreign trade zones | <input type="checkbox"/> | <input type="checkbox"/> |
| Bonded warehouses | <input type="checkbox"/> | <input type="checkbox"/> |
| Temporary importation under bond | <input type="checkbox"/> | <input type="checkbox"/> |

- I-9. **Other trade actions.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

| No | Yes | If yes, Yes--Please specify. |
|--------------------------|--------------------------|------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | |

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Nitin Joshi (202-708-1669, nitin.gov@usitc.gov). **Supply all data requested on a calendar-year basis.**

- II-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part II.

| | |
|-----------|--|
| Name | |
| Title | |
| Email | |
| Telephone | |

- II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of walk-behind lawn mowers since January 1, 2018.

| <i>(check as many as appropriate)</i> | | <i>(If checked, please describe the nature, date(s), and significance of any such reported changes as well as the business reasons for them; leave completely blank if not applicable)</i> |
|---------------------------------------|---|--|
| <input type="checkbox"/> | Office/warehouse openings | |
| <input type="checkbox"/> | Office/warehouse closings | |
| <input type="checkbox"/> | Relocations | |
| <input type="checkbox"/> | Expansions | |
| <input type="checkbox"/> | Acquisitions | |
| <input type="checkbox"/> | Consolidations | |
| <input type="checkbox"/> | Prolonged shutdowns or importation curtailments | |
| <input type="checkbox"/> | Revised labor agreements | |
| <input type="checkbox"/> | Other (e.g., technology) | |

- II-2b. **COVID-19 pandemic.**—Since January 1, 2020, has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in relation to your firm's supply chain arrangements, importation, employment, and shipments relating to walk-behind lawn mowers?

| | | |
|--------------------------|--------------------------|---|
| No | Yes | If yes, describe these changes including a separate discussion of the (a) supply chain impact, (b) importation and shipments impact, and (c) employment impact of the COVID-19 pandemic. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

- II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of walk-behind lawn mowers for delivery after **December 30, 2020**?

"Arranged imports" are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

| | | |
|--------------------------|--------------------------|--|
| No | Yes | If yes, fill out the table below. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

| Source | Period | | | |
|--|-----------------------------------|--------------|----------------|--------------|
| | Jan-Mar 2021 | Apr-Jun 2021 | July-Sept 2021 | Oct-Dec 2021 |
| | Quantity (<i>in units</i>) | | | |
| China -- with small vertical engines from China | | | | |
| China -- without small vertical engines from China | | | | |
| Vietnam -- with small vertical engines from China | | | | |
| Vietnam -- without small vertical engines from China | | | | |
| All other sources -- with small vertical engines from China | | | | |
| All other sources -- without small vertical engines from China | | | | |

- II-3b. **Imports in the 12 month period preceding the petition.**--Has your firm imported walk-behind lawn mowers from any source between May 1, 2019 and April 31, 2020? (i.e., the last eight months in 2019 and first four months in 2020 combined)

| | | |
|--------------------------|--------------------------|--|
| No | Yes | If yes, report the quantity of such import below by source. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

| Quantity (<i>in units</i>) | |
|--|-----------------------------|
| Source | May 2019 through April 2020 |
| China -- with small vertical engines from China | |
| China -- without small vertical engines from China | |
| Vietnam -- with small vertical engines from China | |
| Vietnam -- without small vertical engines from China | |
| All other sources -- with small vertical engines from China | |
| All other sources -- without small vertical engines from China | |

- II-4. **Reasons for importing if producer.**--If your firm also produces walk-behind lawn mowers in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

| |
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| |
|--|

Definitions

“Imports” –Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty).

“Import quantities” –Quantities reported should be net of returns.

“Import values” –Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

“Commercial U.S. shipments” – Shipments made within the United States as a result of an arm’s length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

“Internal consumption/including own firm’s retail” –Product consumed internally by your firm, which includes merchandise that your firm transferred to your own firm’s retail establishments (i.e., shipped to either a bricks-and-mortar store or to an online order fulfillment center). Such transactions are to be valued at fair market value and not the total value of final downstream processed merchandise in the case of internal consumption, nor the retail sale value in the case of your firm owning and operating its own retail establishments or using a third-party fulfillment center to place retail level sales.

“Transfers to related firms” –Shipments made to related firms. Such transactions are valued at fair market value.

“Related firm” –A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

“Export shipments” – Shipments to destinations outside the United States, including shipments to related firms.

“Inventories” --Finished goods inventory, not raw materials or work in progress.

“Small vertical shaft engines” -- Spark-ignited, non-road, vertical shaft engines between 99cc and up to 225cc, whether finished or unfinished, whether assembled or unassembled, whether mounted or unmounted, primarily for walk-behind lawn mowers. (for further detail see: https://usitc.gov/investigations/701731/2020/small_vertical_shaft_engines_china/Final.htm)

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the trade data, as Commission staff may contact your firm regarding questions on the trade data. The Commission may also request that your company submit copies of the supporting documents/records (such as production and sales schedules, inventory records, etc.) used to compile these data.

II-5a. **U.S. imports from China (with small vertical engines from China).**— Report your firm's imports and your firm's shipments and inventories of walk-behind lawn mowers imported from China by your firm during the specified periods.

China (with small vertical engines from China)

| Quantity (in units), value (in \$1,000) | | | |
|---|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| Beginning-of-period inventories (quantity) (A) | | | |
| Imports: ¹ | | | |
| Quantity (B) | | | |
| Value (C) | | | |
| U.S. shipments: | | | |
| Commercial shipments: | | | |
| Quantity (D) | | | |
| Value (E) | | | |
| Internal consumption/ including own firm's retail: ² | | | |
| Quantity (F) | | | |
| Value ² (G) | | | |
| Transfers to related firms: ³ | | | |
| Quantity (H) | | | |
| Value ² (I) | | | |
| Export shipments: ⁴ | | | |
| Quantity (J) | | | |
| Value (K) | | | |
| End-of-period inventories (quantity) (L) | | | |
| <p>¹ Please identify the foreign producers, if known: _____.</p> <p>² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p>³ Identify your firm's principal export markets: _____.</p> | | | |

II-5a. **U.S. imports from China (with small vertical engines from China).**—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.—Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| Reconciliation | Calendar years | | |
|---|----------------|------|------|
| | 2018 | 2019 | 2020 |
| A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 0 |
| ¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____. | | | |

II-5b. **Channels of distribution: China (with small vertical engines from China).**—Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution during the specified periods.

China (with small vertical engines from China)

| Item | Calendar year | | |
|---|---------------------|------|------|
| | 2018 | 2019 | 2020 |
| | Quantity (in units) | | |
| Channels of distribution: | | | |
| U.S. shipments: | | | |
| To retailers ¹ (M) | | | |
| To distributors (N) | | | |
| To end users (O) | | | |
| ¹ If your firm imports for your own retail establishments, report channels as "to retailers" as you are transferring the imported merchandise to your own establishments for an eventual retail level transaction. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation item | Calendar years | | |
|--|----------------|------|------|
| | 2018 | 2019 | 2020 |
| M + N + O – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-5c. **U.S. shipments of imports by walk-behind lawn mowers from China (with small vertical engines from China).**—Report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of walk-behind lawn mowers imports from China by mower branding during the specified periods.
- "Branded"** – Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer.
- "Private label"** – Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer.

China (with small vertical engines from China)

| Quantity (<i>in units</i>) and value (<i>in \$1,000s</i>) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| U.S. shipments: | | | |
| Branded:¹ | | | |
| Quantity (P) | | | |
| Value (Q) | | | |
| Private label:² | | | |
| Quantity (R) | | | |
| Value (S) | | | |
| ¹ . Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer. ² . Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities and values reported for mower branding (*i.e.*, lines P through S) in each time period equal the quantities and values reported for U.S. shipments (*i.e.*, lines D through I) in each time period. If the calculated fields below return values other than zero (*i.e.*, "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2017 | 2018 | 2019 |
| Quantity: $P + R - D - F - H = \text{zero ("0")}$, if not revise. | 0 | 0 | 0 |
| Value: $Q + S - E - G - I = \text{zero ("0")}$, if not revise. | 0 | 0 | 0 |

II-5d. **U.S. imports from China (without small vertical engines from China).**— Report your firm's imports and your firm's shipments and inventories of walk-behind lawn mowers imported from China by your firm during the specified periods.

China (without small vertical engines from China)

| Quantity (in units), value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| Beginning-of-period inventories (quantity) (A) | | | |
| Imports: ^{1,2} | | | |
| Quantity (B) | | | |
| Value (C) | | | |
| U.S. shipments: | | | |
| Commercial shipments: | | | |
| Quantity (D) | | | |
| Value (E) | | | |
| Internal consumption/ including own firm's retail: ³ | | | |
| Quantity (F) | | | |
| Value ² (G) | | | |
| Transfers to related firms: ³ | | | |
| Quantity (H) | | | |
| Value ² (I) | | | |
| Export shipments: ⁴ | | | |
| Quantity (J) | | | |
| Value (K) | | | |
| End-of-period inventories (quantity) (L) | | | |
| ¹ Please identify the foreign producers, if known: _____. ² Please indicate the country or countries in which small vertical engines included on these mowers were manufactured: _____. ³ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. ⁴ Identify your firm's principal export markets: _____. | | | |

II-5d. **U.S. imports from China (without small vertical engines from China).--Continued**

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| Reconciliation | Calendar years | | |
|---|----------------|------|------|
| | 2018 | 2019 | 2020 |
| A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 0 |
| ¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____. | | | |

II-5e. **Channels of distribution: China (without small vertical engines from China).**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution during the specified periods.

China (without small vertical engines from China)

| Item | Calendar year | | |
|---|---------------------|------|------|
| | 2018 | 2019 | 2020 |
| | Quantity (in units) | | |
| Channels of distribution: | | | |
| U.S. shipments: | | | |
| To retailers ¹ (M) | | | |
| To distributors (N) | | | |
| To end users (O) | | | |
| ¹ If your firm imports for your own retail establishments, report channels as "to retailers" as you are transferring the imported merchandise to your own establishments for an eventual retail level transaction. | | | |

RECONCILIATION OF CHANNELS.--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation item | Calendar years | | |
|--|----------------|------|------|
| | 2018 | 2019 | 2020 |
| M + N + O – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-5f. **U.S. shipments of imports by walk-behind lawn mowers from China (without small vertical engines from China).**—Report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of walk-behind lawn mowers imports from China by mower branding during the specified periods.
- "Branded"** – Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer.
- "Private label"** – Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer.

China (without small vertical engines from China)

| Quantity (<i>in units</i>) and value (<i>in \$1,000s</i>) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| U.S. shipments: | | | |
| Branded:¹ | | | |
| Quantity (P) | | | |
| Value (Q) | | | |
| Private label:² | | | |
| Quantity (R) | | | |
| Value (S) | | | |
| ¹ . Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer. ² . Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities and values reported for mower branding (*i.e.*, lines P through S) in each time period equal the quantities and values reported for U.S. shipments (*i.e.*, lines D through I) in each time period. If the calculated fields below return values other than zero (*i.e.*, "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2017 | 2018 | 2019 |
| Quantity: P + R – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |
| Value: Q + S – E – G – I = zero ("0"), if not revise. | 0 | 0 | 0 |

II-5h. **Product mix: China (without small vertical engine from China).**--Does your firm import from China the following products? (check all that apply):

China (without small vertical engine from China)

Propellant technologies

- ☐ Push only
- ☐ Self-propellant mechanism

Start technologies

- ☐ Pull start only
- ☐ Button or auto start system

Grass catching technologies

- ☐ Grass discharge bag attachment
- ☐ No grass discharge bag attachment

Cutting decks

- ☐ Steel cutting deck
- ☐ Aluminum cutting deck
- ☐ Other cutting decks

Engine displacement categories

- ☐ 129 cc and lower displacement
- ☐ 130 cc through and including 139 cc displacement
- ☐ 140 cc through and including 149 cc displacement
- ☐ 150 cc through and including 159 cc displacement
- ☐ 160 cc through and including 169 cc displacement
- ☐ 170 cc and greater displacement

Blade sizes

- ☐ Less than 21" blades
- ☐ 21" blades
- ☐ Greater than 21" blades

Describe any other unique characteristics

| |
|--|
| |
|--|

II-6a. **U.S. imports from Vietnam (with small vertical engines from China).**– Report your firm's imports and your firm's shipments and inventories of walk-behind lawn mowers imported from Vietnam by your firm during the specified periods.

Vietnam (with small vertical engines from China)

| Quantity (in units), value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| Beginning-of-period inventories (quantity) (A) | | | |
| Imports: ¹ | | | |
| Quantity (B) | | | |
| Value (C) | | | |
| U.S. shipments: | | | |
| Commercial shipments: | | | |
| Quantity (D) | | | |
| Value (E) | | | |
| Internal consumption/ including own firm's retail: ² | | | |
| Quantity (F) | | | |
| Value ² (G) | | | |
| Transfers to related firms: ³ | | | |
| Quantity (H) | | | |
| Value ² (I) | | | |
| Export shipments: ⁴ | | | |
| Quantity (J) | | | |
| Value (K) | | | |
| End-of-period inventories (quantity) (L) | | | |
| ¹ Please identify the foreign producers, if known: _____. ² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. ³ Identify your firm's principal export markets: _____. | | | |

II-6a. **U.S. imports from Vietnam (with small vertical engines from China).**—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.—Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| Reconciliation | Calendar years | | |
|---|----------------|------|------|
| | 2018 | 2019 | 2020 |
| A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 0 |
| ¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____. | | | |

II-6b. **Channels of distribution: Vietnam (with small vertical engines from China).**—Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Vietnam by channel of distribution during the specified periods.

Vietnam (with small vertical engines from China)

| Item | Calendar year | | |
|---|---------------------|------|------|
| | 2018 | 2019 | 2020 |
| | Quantity (in units) | | |
| Channels of distribution: | | | |
| U.S. shipments: | | | |
| To retailers ¹ (M) | | | |
| To distributors (N) | | | |
| To end users (O) | | | |
| ¹ If your firm imports for your own retail establishments, report channels as "to retailers" as you are transferring the imported merchandise to your own establishments for an eventual retail level transaction. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation item | Calendar years | | |
|--|----------------|------|------|
| | 2018 | 2019 | 2020 |
| M + N + O – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-6c. **U.S. shipments of imports by walk-behind lawn mowers from Vietnam (with small vertical engines from China).**—Report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of walk-behind lawn mowers imports from Vietnam by mower branding during the specified periods.
- "Branded"** – Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer.
- "Private label"** – Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer.

Vietnam (with small vertical engines from China)

| Quantity (<i>in units</i>) and value (<i>in \$1,000s</i>) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| U.S. shipments: | | | |
| Branded:¹ | | | |
| Quantity (P) | | | |
| Value (Q) | | | |
| Private label:² | | | |
| Quantity (R) | | | |
| Value (S) | | | |
| ¹ . Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer. ² . Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities and values reported for mower branding (*i.e.*, lines P through S) in each time period equal the quantities and values reported for U.S. shipments (*i.e.*, lines D through I) in each time period. If the calculated fields below return values other than zero (*i.e.*, "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2017 | 2018 | 2019 |
| Quantity: P + R – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |
| Value: Q + S – E – G – I = zero ("0"), if not revise. | 0 | 0 | 0 |

II-6d. **U.S. imports from Vietnam (without small vertical engines from China).**— Report your firm's imports and your firm's shipments and inventories of walk-behind lawn mowers imported from Vietnam by your firm during the specified periods.

Vietnam (without small vertical engines from China)

| Quantity (in units), value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| Beginning-of-period inventories (quantity) (A) | | | |
| Imports: ^{1 2} | | | |
| Quantity (B) | | | |
| Value (C) | | | |
| U.S. shipments: | | | |
| Commercial shipments: | | | |
| Quantity (D) | | | |
| Value (E) | | | |
| Internal consumption/ including own firm's retail: ³ | | | |
| Quantity (F) | | | |
| Value ² (G) | | | |
| Transfers to related firms: ³ | | | |
| Quantity (H) | | | |
| Value ² (I) | | | |
| Export shipments: ⁴ | | | |
| Quantity (J) | | | |
| Value (K) | | | |
| End-of-period inventories (quantity) (L) | | | |
| ¹ Please identify the foreign producers, if known: _____. ² Please indicate the country or countries in which small vertical engines included on these mowers were manufactured: _____. ³ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. ⁴ Identify your firm's principal export markets: _____. | | | |

II-6d. **U.S. imports from Vietnam (without small vertical engines from China).--Continued**

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| Reconciliation | Calendar years | | |
|---|----------------|------|------|
| | 2018 | 2019 | 2020 |
| A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 0 |
| ¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____. | | | |

II-6e. **Channels of distribution: Vietnam (without small vertical engines from China).**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Vietnam by channel of distribution during the specified periods.

Vietnam (without small vertical engines from China)

| Item | Calendar year | | |
|---|---------------------|------|------|
| | 2018 | 2019 | 2020 |
| | Quantity (in units) | | |
| Channels of distribution: | | | |
| U.S. shipments: | | | |
| To retailers ¹ (M) | | | |
| To distributors (N) | | | |
| To end users (O) | | | |
| ¹ If your firm imports for your own retail establishments, report channels as "to retailers" as you are transferring the imported merchandise to your own establishments for an eventual retail level transaction. | | | |

RECONCILIATION OF CHANNELS.--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation item | Calendar years | | |
|--|----------------|------|------|
| | 2018 | 2019 | 2020 |
| M + N + O – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |

II-6f. **U.S. shipments of imports by walk-behind lawn mowers from Vietnam (without small vertical engines from China).**—Report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of walk-behind lawn mowers imports from Vietnam by mower branding during the specified periods.

"Branded" – Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer.

"Private label" – Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer.

Vietnam (without small vertical engines from China)

| Quantity (<i>in units</i>) and value (<i>in \$1,000s</i>) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| U.S. shipments: | | | |
| Branded:¹ | | | |
| Quantity (P) | | | |
| Value (Q) | | | |
| Private label:² | | | |
| Quantity (R) | | | |
| Value (S) | | | |
| ¹ . Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer. ² . Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities and values reported for mower branding (*i.e.*, lines P through S) in each time period equal the quantities and values reported for U.S. shipments (*i.e.*, lines D through I) in each time period. If the calculated fields below return values other than zero (*i.e.*, "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2017 | 2018 | 2019 |
| Quantity: P + R – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |
| Value: Q + S – E – G – I = zero ("0"), if not revise. | 0 | 0 | 0 |

II-6g. **Product mix: Vietnam (with small vertical engine from China).** --Does your firm import from Vietnam the following products? (check all that apply):

Vietnam (with small vertical engine from China)

Propellant technologies

- ☐ Push only
- ☐ Self-propellant mechanism

Start technologies

- ☐ Pull start only
- ☐ Button or auto start system

Grass catching technologies

- ☐ Grass discharge bag attachment
 - ☐ No grass discharge bag attachment

Cutting decks

- ☐ Steel cutting deck
☐ Aluminum cutting deck
☐ Other cutting decks

Engine displacement categories

- ☐ 129 cc and lower displacement
- ☐ 130 cc through and including 139 cc displacement
- ☐ 140 cc through and including 149 cc displacement
- ☐ 150 cc through and including 159 cc displacement
- ☐ 160 cc through and including 169 cc displacement
- ☐ 170 cc and greater displacement

Blade sizes

- ☐ Less than 21" blades
- ☐ 21" blades
- ☐ Greater than 21" blades

Describe any other unique characteristics

| |
|--|
| |
|--|

II-6h. **Product mix: Vietnam (without small vertical engine from China).** --Does your firm import from Vietnam the following products? (check all that apply):

Vietnam (without small vertical engine from China)

Propellant technologies

- ☐ Push only
- ☐ Self-propellant mechanism

Start technologies

- ☐ Pull start only
- ☐ Button or auto start system

Grass catching technologies

- ☐ Grass discharge bag attachment
- ☐ No grass discharge bag attachment

Cutting decks

- ☐ Steel cutting deck
- ☐ Aluminum cutting deck
- ☐ Other cutting decks

Engine displacement categories

- ☐ 129 cc and lower displacement
- ☐ 130 cc through and including 139 cc displacement
- ☐ 140 cc through and including 149 cc displacement
- ☐ 150 cc through and including 159 cc displacement
- ☐ 160 cc through and including 169 cc displacement
- ☐ 170 cc and greater displacement

Blade sizes

- ☐ Less than 21" blades
- ☐ 21" blades
- ☐ Greater than 21" blades

Describe any other unique characteristics

| |
|--|
| |
|--|

- II-7a. **Imports from all other sources (with small vertical engines from China).**— Report your firm's imports and your firm's shipments and inventories of walk-behind lawn mowers imported from **all other sources** by your firm during the specified periods.

All other sources (with small vertical engines from China)

(list sources: _____)

| Quantity (in units), value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| Beginning-of-period inventories (<i>quantity</i>) (A) | | | |
| Imports: ¹ | | | |
| <i>Quantity</i> (B) | | | |
| <i>Value</i> (C) | | | |
| U.S. shipments: | | | |
| Commercial shipments: | | | |
| <i>Quantity</i> (D) | | | |
| <i>Value</i> (E) | | | |
| Internal consumption/ including own firm's retail: ³ | | | |
| <i>Quantity</i> (F) | | | |
| <i>Value</i> ² (G) | | | |
| Transfers to related firms: ³ | | | |
| <i>Quantity</i> (H) | | | |
| <i>Value</i> ² (I) | | | |
| Export shipments: ⁴ | | | |
| <i>Quantity</i> (J) | | | |
| <i>Value</i> (K) | | | |
| End-of-period inventories (<i>quantity</i>) (L) | | | |

¹ Please identify the foreign producers, if known: _____.

² Please indicate the country or countries in which small vertical engines included on these mowers were manufactured: _____.

³ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.

⁴ Identify your firm's principal export markets: _____.

II-7a. **Imports from all other sources (with small vertical engines from China).**–Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2018 | 2019 | 2020 |
| A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 0 |
| ¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____. | | | |

II-7b. **Channels of distribution: All other sources (with small vertical engines from China).**– Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution during the specified periods.

All other sources (with small vertical engines from China)

| Item | Calendar year | | |
|---|---------------------|------|------|
| | 2018 | 2019 | 2020 |
| | Quantity (in units) | | |
| Channels of distribution: | | | |
| U.S. shipments: | | | |
| To retailers ¹ (M) | | | |
| To distributors (N) | | | |
| To end users (O) | | | |
| ¹ If your firm imports for your own retail establishments, report channels as "to retailers" as you are transferring the imported merchandise to your own establishments for an eventual retail level transaction. | | | |

RECONCILIATION OF CHANNELS.--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation item | Calendar year | | |
|--|---------------|------|------|
| | 2018 | 2019 | 2020 |
| M + N + O – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-7c. **U.S. shipments of imports by walk-behind lawn mowers from all other sources (with small vertical engines from China).**—Report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of walk-behind lawn mowers imports from all other sources by mower branding during the specified periods.

"Branded" – Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer.

"Private label" – Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer.

All other sources (with small vertical engines from China)

| Quantity (<i>in units</i>) and value (<i>in \$1,000s</i>) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| U.S. shipments: | | | |
| Branded:¹ | | | |
| Quantity (P) | | | |
| Value (Q) | | | |
| Private label:² | | | |
| Quantity (R) | | | |
| Value (S) | | | |
| ¹ . Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer. ² . Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities and values reported for mower branding (*i.e.*, lines P through S) in each time period equal the quantities and values reported for U.S. shipments (*i.e.*, lines D through I) in each time period. If the calculated fields below return values other than zero (*i.e.*, "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2017 | 2018 | 2019 |
| Quantity: $P + R - D - F - H = \text{zero ("0")}$, if not revise. | 0 | 0 | 0 |
| Value: $Q + S - E - G - I = \text{zero ("0")}$, if not revise. | 0 | 0 | 0 |

- II-7d. **Imports from all other sources (without small vertical engines from China).**— Report your firm's imports and your firm's shipments and inventories of walk-behind lawn mowers imported from **all other sources** by your firm during the specified periods.

All other sources (without small vertical engines from China)

(list sources: _____)

| Quantity (in units), value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| Beginning-of-period inventories (<i>quantity</i>) (A) | | | |
| Imports: ¹ | | | |
| <i>Quantity</i> (B) | | | |
| <i>Value</i> (C) | | | |
| U.S. shipments: | | | |
| Commercial shipments: | | | |
| <i>Quantity</i> (D) | | | |
| <i>Value</i> (E) | | | |
| Internal consumption/ including own firm's retail: ² | | | |
| <i>Quantity</i> (F) | | | |
| <i>Value</i> ² (G) | | | |
| Transfers to related firms: ³ | | | |
| <i>Quantity</i> (H) | | | |
| <i>Value</i> ² (I) | | | |
| Export shipments: ⁴ | | | |
| <i>Quantity</i> (J) | | | |
| <i>Value</i> (K) | | | |
| End-of-period inventories (<i>quantity</i>) (L) | | | |

¹ Please identify the foreign producers, if known: _____.

² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.

³ Identify your firm's principal export markets: _____.

II-7d. **Imports from all other sources (without small vertical engines from China).**–Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2018 | 2019 | 2020 |
| A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 0 |
| ¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____. | | | |

II-7e. **Channels of distribution: All other sources (without small vertical engines from China).**–

Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution during the specified periods.

All other sources (without small vertical engines from China)

| Item | Calendar year | | |
|---|---------------------|------|------|
| | 2018 | 2019 | 2020 |
| | Quantity (in units) | | |
| Channels of distribution: | | | |
| U.S. shipments: | | | |
| To retailers ¹ (M) | | | |
| To distributors (N) | | | |
| To end users (O) | | | |
| ¹ If your firm imports for your own retail establishments, report channels as "to retailers" as you are transferring the imported merchandise to your own establishments for an eventual retail level transaction. | | | |

RECONCILIATION OF CHANNELS.--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

| Reconciliation item | Calendar year | | |
|--|---------------|------|------|
| | 2018 | 2019 | 2020 |
| M + N + O – D – F – H = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-7f. **U.S. shipments of imports by walk-behind lawn mowers from all other sources (without small vertical engines from China).**—Report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of walk-behind lawn mowers imports from all other sources by mower branding during the specified periods.

“Branded” – Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer.

“Private label” – Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer.

All other sources (without small vertical engines from China)

| Quantity (<i>in units</i>) and value (<i>in \$1,000s</i>) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2018 | 2019 | 2020 |
| U.S. shipments: | | | |
| Branded:¹ | | | |
| Quantity (P) | | | |
| Value (Q) | | | |
| Private label:² | | | |
| Quantity (R) | | | |
| Value (S) | | | |
| ¹ . Walk-behind lawn mowers that are assembled and sold with the name or brand of the mower manufacturer. ² . Walk-behind lawn mowers that are assembled and sold with the name or brand of a firm other than the mower manufacturer. | | | |

RECONCILIATION OF CHANNELS.—Please ensure that the quantities and values reported for mower branding (*i.e.*, lines P through S) in each time period equal the quantities and values reported for U.S. shipments (*i.e.*, lines D through I) in each time period. If the calculated fields below return values other than zero (*i.e.*, “0”), the data reported must be revised prior to submission to the Commission.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2017 | 2018 | 2019 |
| Quantity: $P + R - D - F - H = \text{zero ("0")}$, if not revise. | 0 | 0 | 0 |
| Value: $Q + S - E - G - I = \text{zero ("0")}$, if not revise. | 0 | 0 | 0 |

II-7g. **Product mix: All other sources (with small vertical engines from China).**--Does your firm import from all other sources the following products? (check all that apply):

All other sources (with small vertical engines from China)

Propellant technologies

- ☐ Push only
- ☐ Self-propellant mechanism

Start technologies

- ☐ Pull start only
- ☐ Button or auto start system

Grass catching technologies

- ☐ Grass discharge bag attachment
- ☐ No grass discharge bag attachment

Cutting decks

- ☐ Steel cutting deck
- ☐ Aluminum cutting deck
- ☐ Other cutting decks

Engine displacement categories

- ☐ 129 cc and lower displacement
- ☐ 130 cc through and including 139 cc displacement
- ☐ 140 cc through and including 149 cc displacement
- ☐ 150 cc through and including 159 cc displacement
- ☐ 160 cc through and including 169 cc displacement
- ☐ 170 cc and greater displacement

Blade sizes

- ☐ Less than 21" blades
- ☐ 21" blades
- ☐ Greater than 21" blades

Describe any other unique characteristics

| |
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| |
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- II-8. **Range of AUVs.**--What is the range of per unit values for the different walk behind lawn mowers imported by your firm.

| Type | Unit value (dollars per unit) | Description of the product |
|--|--------------------------------------|-----------------------------------|
| Lowest per unit value walk-behind lawn mower imported and sold by your firm | | |
| Highest volume walk-behind lawn mower imported and sold by your firm | | |
| Highest per unit value walk-behind lawn mower imported and sold by your firm | | |

- II-9. **Transfers to related firms.**--If your firm reported transfers to related firms in any of the data tables in part II, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary) and whether the transfers were priced at market value or by a non-market formula.

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- II-10. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

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PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Hau (Howie) Nguyen (202-708-1441, Hau.nguyen@usitc.gov).

- III-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part III.

| | |
|-----------|--|
| Name | |
| Title | |
| Email | |
| Telephone | |

PRICE DATA

- III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. retailers since January 1, 2018 of the following products your firm imported from China or Vietnam:

Product 1.-- Non-Self-Propelled Lawn Mower with an engine displacement between 120 and 150 cc, a blade ranging from 19.50" to 20.49" for cutting decks*, and without a grass-catching bag.

Product 2.-- Non-Self-Propelled Lawn Mower with an engine displacement between 150 and 180 cc, a blade ranging from 20.50" to 21.49" for cutting decks*, and without a grass-catching bag.

Product 3.-- Self-Propelled Lawn Mower with an engine displacement between 160 and 180 cc, a blade ranging from 20.50" to 21.49" for cutting decks*, and with a grass-catching bag.

Product 4.-- Self-Propelled Lawn Mower with an engine displacement between 170 and 195 cc, a blade ranging from 20.5" to 21.49" for cutting decks*, and with a grass-catching bag.

*** "blade for cutting deck" is synonymous with "cutting width" and/or "cutting swath."**

Please note that values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts or rebates² including those provided to you by OEM manufacturers and engine manufacturers).

During January 2018-December 2020, did your firm import from China or Vietnam and sell to unrelated U.S. retailers any of the above listed products (or any products that were competitive with these products)?

| | |
|--------------------------|---|
| <input type="checkbox"/> | Yes. --Please complete the following pricing data table(s) as appropriate. |
| <input type="checkbox"/> | No. --Skip to question III-3. |

² For the purposes of this questionnaire "rebates" include any rebates to retailers from any party related to the purchase of the lawn mower, including the engine manufacturer, and include any direct or indirect support including, but not limited to incentives, allowances, and marketing support

III-2a. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from China (with a China small vertical shaft engine(VSE)) and sold to retailers by your firm.

China mower (with small vertical engines from China)

Report data in units and actual dollars (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|-------|-----------|-------|-----------|-------|-----------|-------|
| Period of shipment | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred

² Pricing product definitions are provided on the first page of Part III

Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

III-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from China (with a non-China small vertical shaft engine(VSE)) and sold to retailers by your firm.

China mower (without small vertical engines from China)

Report data in units and actual dollars (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|-------|-----------|-------|-----------|-------|-----------|-------|
| Period of shipment | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred

² Pricing product definitions are provided on the first page of Part III

Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

III-2c. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from Vietnam (with a China small vertical shaft engine (VSE)) and sold to retailers by your firm.

Vietnam mower (with small vertical engines from China)

Report data in units and actual dollars (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|-------|-----------|-------|-----------|-------|-----------|-------|
| Period of shipment | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred

² Pricing product definitions are provided on the first page of Part III

Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

III-2d. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from Vietnam (with a non-China small vertical shaft engine (VSE)) and sold to retailers by your firm.

Vietnam mower (without small vertical engines from China)

Report data in units and actual dollars (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|-------|-----------|-------|-----------|-------|-----------|-------|
| Period of shipment | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred

² Pricing product definitions are provided on the first page of Part III

Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

III-2c. **Price data checklist.**--Please check that the pricing data in question III-2(a) has been correctly reported.

| Are the price data reported above: | ✓ if Yes |
|--|--------------------------|
| In actual dollars (not \$1,000) and units? | <input type="checkbox"/> |
| F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)? | <input type="checkbox"/> |
| Net of all discounts and rebates (direct/indirect)? | <input type="checkbox"/> |
| Have discounts, rebates, and returns credited to the quarter in which the sale occurred? | <input type="checkbox"/> |
| Quantities do not exceed commercial shipments in question II-7 in each year? | <input type="checkbox"/> |
| Include only sales to retailers (not sales to distributors)? | <input type="checkbox"/> |

III-2d. **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the price data, as Commission staff may contact your firm regarding questions on the price data. The Commission may also request that your company submit copies of the supporting documents/records (such as sales journal, invoices, etc.) used to compile these data.

PURCHASE COST DATA

- III-3. **Imports for internal use or retail sale**--This question requests quarterly quantity and landed-duty paid value data for your firm's imports of the products defined above (on the first page of part III) for use for sales in your firm's retail locations from China or Vietnam since January 1, 2018.

During January 2018 - December 2020, did your firm import any of the products listed on the first page of part III from China or Vietnam for use for sales in your firm's retail locations}?

| | |
|--------------------------|--|
| <input type="checkbox"/> | Yes. --Please complete the following table(s) as appropriate. |
| <input type="checkbox"/> | No. --Skip to question III-4. |

III-3a. **Imports for internal use or retail sale.**—Report below the import data¹ for pricing products² imported from China (with a China small vertical shaft engine (VSE)) for eventual retail sale.

Please note that values should be **landed, duty-paid (LDP)** and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

China mower (with small vertical engines from China) – Purchase Cost

Report data in units and actual dollars (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|
| Period of importation | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred. See "Import values" definition in Part II (Trade and Related Information – Definitions).

² Pricing product definitions are provided on the first page of Part III

Note.—If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

III-3b. **Imports for internal use or retail sale.**—Report below the import data¹ for pricing products² imported from China (with a non-China small vertical shaft engine (VSE)) for eventual retail sale.

Please note that values should be **landed, duty-paid (LDP)** and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

China mower (without small vertical engines from China) – Purchase Cost

Report data in **units** and **actual dollars** (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|
| Period of importation | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred. See "Import values" definition in Part II (Trade and Related Information – Definitions).

² Pricing product definitions are provided on the first page of Part III

Note.—If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

III-3c. **Imports for internal use or retail sale.**—Report below the import data¹ for pricing products² imported from (with a China small vertical shaft engine (VSE)) Vietnam for eventual retail sale.

Please note that values should be **landed, duty-paid (LDP)** and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

Vietnam mower (with small vertical engines from China) – Purchase Cost

Report data in **units** and **actual dollars** (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|
| Period of importation | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred. See "Import values" definition in Part II (Trade and Related Information – Definitions).

² Pricing product definitions are provided on the first page of Part III

Note.—If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

III-3d. **Imports for internal use or retail sale.**—Report below the import data¹ for pricing products² imported from (with a non-China small vertical shaft engine (VSE)) Vietnam for eventual retail sale.

Please note that values should be landed, duty-paid (LDP) and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

Vietnam mower (without small vertical engines from China) – Purchase Cost

Report data in units and actual dollars (not 1,000s).

| (Quantity in units, value in dollars) | | | | | | | | |
|---------------------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|-----------|------------------------|
| Period of importation | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ | Quantity | LDP Value ¹ |
| 2018: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2019: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |
| 2020: | | | | | | | | |
| Jan.-Mar. | | | | | | | | |
| Apr.-Jun. | | | | | | | | |
| Jul.-Sep. | | | | | | | | |
| Oct.-Dec. | | | | | | | | |

¹ LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred. See "Import values" definition in Part II (Trade and Related Information – Definitions).

² Pricing product definitions are provided on the first page of Part III

Note.—If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of these data, as Commission staff may contact your firm regarding questions. The Commission may also request that your company submit copies of the supporting documents/records (such as sales journal, invoices, etc.) used to compile these data.

Complete these questions only if your firm reported data on the previous page, otherwise skip to question III-4.

The following questions ask about the costs/benefits (not included in the LDP values reported above) that factor into your firm's decision to import walk-behind lawn mowers rather than purchase from a U.S. producer or importer of walk-behind lawn mowers.

III-3e. Additional costs for your firm's imports of walk-behind lawn mowers for your firm's retail sale.—

- i. Did your firm incur any additional costs by importing walk-behind lawn mowers rather than purchasing from a U.S. producer or importer (e.g., logistical or supply chain management costs, warehousing/inventory carrying costs, insurance or other risk management fees, demurrage fees, indirect and overseas costs)?

☐ No ☐ Yes—Please answer parts ii, iii, and iv.
- ii. Please provide an estimate of the total additional cost incurred (as a percentage compared to LDP value) when importing walk-behind lawn mowers rather than purchasing from a U.S. producer or importer. (Report only the portion that is related to your firm's importing activities, either directly or indirectly, and not already included in the LDP value. Do NOT include any costs that also would be incurred if your firm purchased the product from a U.S. producer or importer.) _____ percent compared to LDP value.
- iii. Please identify and explain the specific additional costs incurred by your firm and estimate each cost (in percent) compared to the cost of importing. (Only report costs and the portion of each cost that was related to your firm's importing activities for walk-behind lawn mowers, either directly or indirectly, and that are not already included in the LDP value. Do NOT report costs that your firm would incur when purchasing walk-behind lawn mowers from a U.S. producer or importer.)

| Costs | Estimated percentage compared to LDP value (percent) | Explanation |
|-------|--|-------------|
| | % | |
| | % | |
| | % | |
| | % | |

III-3f. **Additional costs for your firm's imports of walk-behind lawn mowers for your firm's retail sale.**--Continued

- iv. Briefly describe how your firm's additional costs (beyond the purchase price) by importing walk-behind lawn mower directly compare with the additional costs your firm incurs when purchasing from a U.S. producer or U.S. importer.

| |
|--|
| |
|--|

III-3g. **Decision basis.**—To which source(s) does your firm compare costs in determining whether or not to import walk-behind lawn mowers? Check all that apply.

| U.S. importers | U.S. producers | Neither U.S. importers nor U.S. producers |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

III-3h. **Benefits of importing walk-behind lawn mowers.**

- i. Briefly identify the benefits of importing walk-behind lawn mowers instead of purchasing walk-behind lawn mowers from a U.S. importer or from a U.S. producer.

| |
|--|
| |
|--|

- ii. Is it your firm's experience that the walk-behind lawn mowers your firm imported from China and Vietnam are priced lower than they would be if your firm purchased from a U.S. importer or U.S. producer?

| Imports are priced lower when | No | Yes (If yes to either, please answer parts iii and iv.) |
|--|--------------------------|--|
| Not including the additional costs above | <input type="checkbox"/> | <input type="checkbox"/> |
| Including the additional costs above | <input type="checkbox"/> | <input type="checkbox"/> |

III-3h. **Benefits of importing walk-behind lawn mowers.**--*Continued*

- iii. Please estimate your firm's savings by importing walk-behind lawn mowers instead of purchasing from a U.S. producer or U.S. importer since January 1, 2018 (as a percent of the purchase price from the U.S. importer or U.S. producer). For your estimate, compare the price of purchasing from a U.S. importer or U.S. producer to the cost of direct imports (including the additional costs described above in III-3f).

| Factors | Estimated savings (percent of purchase price from U.S. importer/producer) |
|----------------|--|
| U.S. producer | % |
| U.S. importer | % |

- iv. What methods or experience did you base the estimates in III-3eiii (i.e. based on previous transactions with U.S. producers and/or U.S. importers, market research, etc.) Check all that apply.

| Reported estimates in III-3eiii based on | ✓ if Yes |
|---|--------------------------|
| Previous company transactions | <input type="checkbox"/> |
| Market research | <input type="checkbox"/> |
| Other – Please explain | <input type="checkbox"/> |

If your firm imports walk-behind lawn mowers for retail use only, please answer question III-4 with respect to your firm's purchases of walk-behind lawn mowers and then skip to question III-11.

- III-4. **Price setting.**--How does your firm determine the prices that it charges for sales of walk-behind lawn mowers (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

| Transaction by transaction | Contracts | Set price lists | Other | If other, describe |
|----------------------------|--------------------------|--------------------------|--------------------------|--------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

- III-5. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

| Quantity discounts | Annual total volume discounts | No discount policy | Other | Describe |
|--------------------------|-------------------------------|--------------------------|--------------------------|----------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

- III-6. **Pricing terms.**--On what basis are your firm's prices of imported walk-behind lawn mowers from China or Vietnam usually quoted (*check one*)?

| Delivered | F.o.b. | If f.o.b., specify point |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- III-7. **Contract versus spot.**--Approximately what share of your firm's sales of walk-behind lawn mowers imported from China or Vietnam in 2020 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

| Item | Type of sale | | | | Total (should sum to 100.0%) |
|---------------------|--|--|---|------------------------------------|------------------------------|
| | Short-term contracts (multiple deliveries for less than 12 months) | Annual contracts (multiple deliveries for 12 months) | Long-term contracts (multiple deliveries for more than 12 months) | Spot sales (for a single delivery) | |
| Share of 2020 sales | % | % | % | % | 0.0 % |

- III-8. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for walk-behind lawn mowers imported from China and Vietnam (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

| Typical sales contract provisions | Item | Short-term contracts (multiple deliveries for less than 12 months) | Annual contracts (multiple deliveries for 12 months) | Long-term contracts (multiple deliveries for more than 12 months) |
|---|-------------|---|---|--|
| Average contract duration | No. of days | | 365 | |
| Price renegotiation (during contract period) | Yes | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | No | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fixed quantity and/or price | Quantity | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Price | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Both | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Indexed to raw material costs ¹ | Yes | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | No | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Not applicable | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ¹ Please identify the indexes used: _____. | | | | |

- III-9. **Lead times.**--What is your firm's share of sales of walk-behind lawn mowers imported from China and Vietnam from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of walk-behind lawn mowers?

| Source | Share of 2020 sales | Lead time (Average number of days) |
|---------------------------------------|---------------------|--|
| From your firm's U.S. inventory | % | |
| From foreign manufacturers' inventory | % | |
| Produced to order | % | |
| Total (should sum to 100.0%) | 0.0 % | |

III-10. **Shipping information.**—

- (a) Who generally arranges the transportation to your firm's customers' locations?
☐ Your firm ☐ Purchaser (*check one*)
- (b) When your firm sells walk-behind lawn mowers imported from China and Vietnam, from where is it shipped?
☐ Point of importation ☐ Storage facility (*check one*)
- (c) Indicate the approximate percentage of your firm's sales of walk-behind lawn mowers imported from China and Vietnam that are delivered the following distances from your firm's U.S. point of shipment.

| Distance from your firm's U.S. point of shipment | Share |
|--|-------|
| Within 100 miles | % |
| 101 to 1,000 miles | % |
| Over 1,000 miles | % |
| Total (should sum to 100.0%) | 0.0 % |

- III-11. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold or internally consumed/transferred (including for own retail level sale) walk-behind lawn mowers imported from subject countries since January 1, 2018 (check all that apply)?

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

- III-12. **Inland transportation costs.**—What is the approximate percentage of the cost of walk-behind lawn mowers imported from China and Vietnam that is accounted for by U.S. inland transportation costs? _____ percent.

III-13. **Substitutes.**--Can other products be substituted for walk-behind lawn mowers?

☐ No ☐ Yes--Please fill out the table.

| Substitute | | Have changes in the price of this substitute affected the price for walk-behind lawn mowers? | | |
|------------|--|--|--------------------------|-------------|
| | | No | Yes | Explanation |
| 1. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. | | <input type="checkbox"/> | <input type="checkbox"/> | |

III-14. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for walk-behind lawn mowers has changed since January 1, 2018. Explain any trends and describe the principal factors that have affected these changes in demand.

| Market | Overall increase | No change | Overall decrease | Fluctuate with no clear trend | Explanation and factors |
|---------------------------|--------------------------|--------------------------|--------------------------|-------------------------------|-------------------------|
| Within the United States | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Outside the United States | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

III-15. **Product changes.**--Have there been any significant changes in the product range, product mix or marketing of walk-behind lawn mowers since January 1, 2018?

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

III-16. **Conditions of competition.**—

(a) Is the walk-behind lawn mowers market subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to walk-behind lawn mowers?

| Check all that apply. | Please describe. |
|---|--------------------------|
| <input type="checkbox"/> No | Skip to question III-17. |
| <input type="checkbox"/> Yes-Business cycles (e.g. seasonal business) | |
| <input type="checkbox"/> Yes-Other distinctive conditions of competition | |

(b) If yes, have there been any changes in the business cycles or conditions of competition for walk-behind lawn mowers since January 1, 2018?

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

III-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply walk-behind lawn mowers since January 1, 2018 (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.)?

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

III-18. **Raw materials.**—

(a) How have walk-behind lawn mowers raw material prices changed since January 1, 2018?

| Factor | Overall increase | No change | Overall decrease | Fluctuate with no clear trend | Explain, noting how raw material price changes have affected your firm's selling prices for walk-behind lawn mowers. |
|-----------------------|-----------------------------|--------------------------|-----------------------------|--|---|
| Cost of raw materials | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

(b) How did the imposition of tariffs under section 232 on imported steel/aluminum products impact raw material costs for walk-behind lawn mowers?

| Factor | Overall increase | No change | Overall decrease | Fluctuate with no clear trend | Explanation |
|---|-----------------------------|--------------------------|-----------------------------|--|--------------------|
| Cost of raw materials after section 232 tariffs imposed | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

(c) How did the imposition of tariffs under section 232 on imported steel/aluminum products impact your firm's sales price for walk-behind lawn mowers?

| Factor | Overall Increase | No change | Overall Decrease | Fluctuate with no clear trend | Explanation |
|---------------------------------------|-----------------------------|--------------------------|-----------------------------|--|--------------------|
| Prices for walk-behind lawn mowers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

III-19. **Impact of section 301 tariffs.**-- Did the imposition of tariffs on Chinese-origin products under section 301 have an impact on the walk-behind lawn mower market in the United States?

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

| Factor | Overall increase | No change | Overall decrease | Fluctuate with no clear trend | Explain, noting how the imposition of tariffs under section 301 affected each factor of the walk-behind lawn mowers market in the United States. |
|---|--------------------------|--------------------------|--------------------------|--------------------------------------|---|
| Supply of U.S.-produced walk-behind lawn mowers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Supply of walk-behind lawn mowers imported from China | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Supply of walk-behind lawn mowers imported from other countries | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Prices for walk-behind lawn mowers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Overall U.S. demand for walk-behind lawn mowers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Raw material costs for walk-behind lawn mowers | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

III-20. **Interchangeability.**--Is walk-behind lawn mowers produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

| Country-pair | China | Vietnam | Other countries |
|---------------|-------|---------|-----------------|
| United States | | | |
| China | | | |
| Vietnam | | | |

For any country-pair producing walk-behind lawn mowers that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:

- III-21. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between walk-behind lawn mowers produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

O = *no familiarity* with products from a specified country-pair

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

- III-22. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for walk-behind lawn mowers since January 1, 2018. Indicate the share of the quantity of your firm's total shipments of walk-behind lawn mowers that each of these customers accounted for in 2020.

| | Customer's name | City | State | Share of 2020 sales (%) |
|----|-----------------|------|-------|-------------------------|
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | | | | |
| 9 | | | | |
| 10 | | | | |

- III-23. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

| |
|--|
| |
|--|

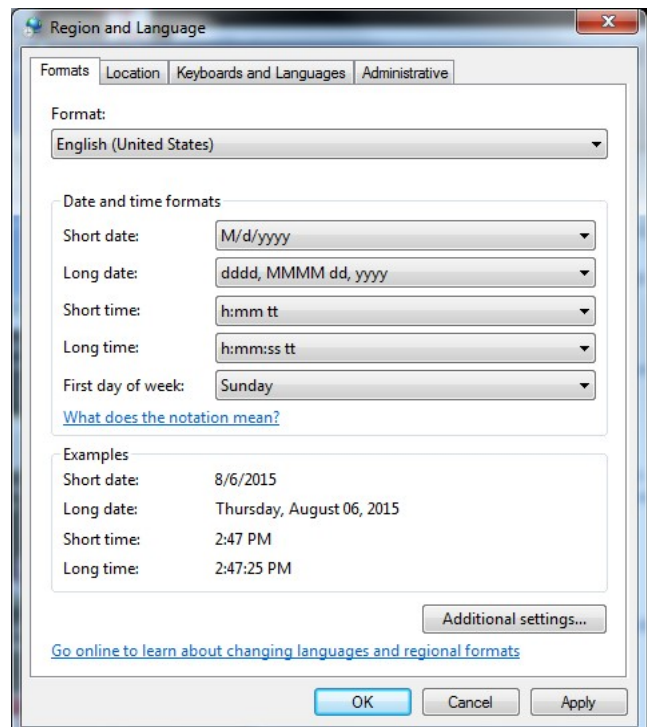
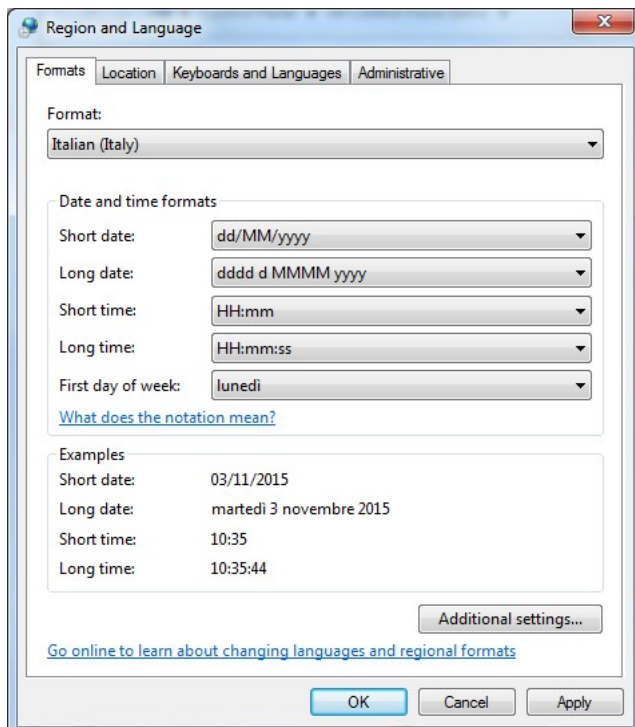
Correcting Valid number error messages.--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. This issues stem from your computer number formatting setting (e.g., not the MS Word document itself, but the computer from which you are opening up the document). In the United States commas (,) delineate multiples of 1000 and periods (.) delineate fractions less than one. Many EU countries use the reverse where multiples of 1000 are delineated with periods (.) and fractions less than one are delineated with commas (,). The U.S. International Trade Commission's questionnaires are set-up in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU number formatting, we believe this may cause this issue.

The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

To temporarily change your computer's number settings to U.S. settings, please do the following (for Microsoft Windows Operating system):

- START
- Control Panel
- Region and Language (under Clock, Language, and Region category)
- Format tab
- Change the Format from your existing one (e.g. "Italian (Italy)") to "English (United States)" (see screen shots below)

When you do this the number "twelve million dollars and thirty five cents" would change from \$12.000.000,35 (Italy format) to \$12,000,000.35 (U.S. format), and then there will be no conflict with the questionnaire. When you finish reporting the data then you can close the questionnaire and switch back to Italy settings.



HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at:

https://usitc.gov/investigations/701731/2020/walk_behind_lawn_mowers_china_and_vietnam/Final.htm

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

- **Upload via Secure Drop Box.**—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission’s secure upload facility:

Web address: <https://dropbox.usitc.gov/oinv/> **Pin:** **XXXX**

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

If your firm did not import this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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