

## U.S. PURCHASERS' QUESTIONNAIRE

### ALUMINUM FOIL FROM ARMENIA, BRAZIL, OMAN, RUSSIA, AND TURKEY

This questionnaire must be received by the Commission by **July 16, 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 and antidumping investigations concerning aluminum foil from Armenia, Brazil, Oman, Russia, and Turkey (Inv. No. 701-TA-658-659 and 731-TA-1538-1542 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)). Further information on this questionnaire can be obtained from James Horne (202-205-2722, James.Horne@usitc.gov).

Name of firm \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Website \_\_\_\_\_

Has your firm purchased, or imported for its own use, aluminum foil (as defined on next page) from any source (domestic or foreign) 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: **FOIL**)

#### CERTIFICATION

*I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By submitting this certification, I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings conducted by the Commission on the same or similar merchandise.*

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

\_\_\_\_\_  
Email address

**PART I.—GENERAL INFORMATION**

**Background.**-- This proceeding was instituted in response to petitions filed on September 29, 2020, by the Aluminum Association Trade Enforcement Working Group, Arlington, Virginia and its individual members - Gränges Americas Inc., Franklin, Tennessee; JW Aluminum Company, Daniel Island, South Carolina; and Novelis Corporation, Atlanta, Georgia. 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 of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at [LINK](#).

**Aluminum foil** -- The merchandise covered by these investigations is aluminum foil having a thickness of 0.2 mm or less, in reels exceeding 25 pounds, regardless of width. Aluminum foil is made from an aluminum alloy that contains more than 92 percent aluminum. Aluminum foil may be made to ASTM specification ASTM B479, but can also be made to other specifications. Regardless of specification, however, all aluminum foil meeting the scope description is included in the scope, including aluminum foil to which lubricant has been applied to one or both sides of the foil.

Excluded from the scope of these investigations is aluminum foil that is backed with paper, paperboard, plastics, or similar backing materials on one side or both sides of the aluminum foil, as well as etched capacitor foil and aluminum foil that is cut to shape. Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above. The products under investigation are currently imported under statistical reporting numbers 7607.11.3000, 7607.11.6090, 7607.11.9030, 7607.11.9060, 7607.11.9090, and 7607.19.6000 of the Harmonized Tariff Schedule of the United States (HTSUS).

Further, merchandise that falls within the scope of these proceedings may also be imported into the United States under HTSUS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3045, 7606.12.3055, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3095, 7606.91.6095, 7606.92.3035, and 7606.92.6095. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

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

**Reporting of information.**--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

**Confidentiality.**--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (*see* 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

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

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

- I-1a. **Establishments covered.**--Provide the name and address of your U.S. establishment(s) covered by this questionnaire, if different from that listed on the cover page. **Firms operating more than one establishment should combine the data for all establishments into a single response.**

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

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

- I-1c. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

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

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

Firm name	Country	Extent of ownership (percent)

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

☐ No      ☐ Yes--List the following information.

Firm name	Country	Affiliation

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

☐ No                      ☐ Yes--List the following information.

<b>Firm name</b>	<b>Country</b>	<b>Affiliation</b>

**PART II.--PURCHASES**

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

Name	
Title	
Email	
Telephone	

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

**"Purchase"** – Purchase from a U.S. entity such as a U.S. producer, a U.S. importer, or other U.S. firm.

**"Import"** – Purchase directly from a foreign supplier and your firm is the importer of record.

Item	2018	2019	2020
	Quantity (in pounds)		
<b>Purchases of aluminum foil produced in—</b>			
United States			
Armenia			
Brazil			
Oman			
Russia			
Turkey			
All other countries <sup>1</sup>			
Sources unknown <sup>2</sup>			
Total purchases	0	0	0
<b>Imports of aluminum foil from—</b>			
Armenia			
Brazil			
Oman			
Russia			
Turkey			
All other countries <sup>1</sup>			
Total imports <sup>3</sup>	0	0	0

<sup>1</sup> Please identify these countries: \_\_\_\_\_.

<sup>2</sup> Please indicate the firm(s) from which you purchased this merchandise: \_\_\_\_\_.

<sup>3</sup> If your firm imported aluminum foil at any time since January 1, 2018, please also complete and return a U.S. importers' questionnaire in this proceeding.

II-2. **Changes in purchasing patterns.**--Please indicate how the shares of your firm's purchases of aluminum foil from different sources have changed since January 1, 2018.

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

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

United States	Armenia	Brazil	Oman	Russia	Turkey	Other countries	Other countries (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

II-4. **Supplier identification.**--Please list your firm's **FIVE** largest suppliers for aluminum foil since January 1, 2018. Also, provide the share of the quantity of your firm's total purchases of aluminum foil that each of these suppliers accounted for in 2020.

No.	Supplier's name	City and state	Share of quantity of 2020 purchases
1			%
2			%
3			%
4			%
5			%

**PART III.--MARKET CHARACTERISTICS AND PURCHASING PRACTICES**

- III-1. **Firm type.**--Which of the following best describes your firm as a purchaser of aluminum foil (check all that apply)?

<b>Produces consumer products</b>	<b>Produces industrial products</b>	<b>Distributor</b>	<b>Other</b>	<b>Describe other</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

***If your firm is a distributor of aluminum foil, please answer questions III-2 and III-3.***

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

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

- III-3. **Types of customers.**--What are the major types of consumers to which your firm sells aluminum foil?

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*If your firm is an end user of aluminum foil, please answer questions III-4 and III-5.*

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

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

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

- (a) Has the demand for your firm's final products incorporating aluminum foil changed since January 1, 2018?

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

- (b) Has this had any effect on your firm's demand for aluminum foil?

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

III-6. **Substitutes.**--Can other products be substituted for aluminum foil?

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

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for aluminum foil?		
		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-7. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for aluminum foil has changed since January 1, 2018. Explain any trends and describe the principal factors (such as foil thickness, COVID-19, etc.) 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-8. **Country preferences.**--Do you or your customers ever specifically order aluminum foil from one country in particular over other possible sources of supply?

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

- III-9. **Importance of purchasing domestic product.**--Please fill out the table below, estimating the percentage of your firm's total 2020 purchases of aluminum foil that required aluminum foil produced in the United States.

	Estimated percentage of your firm's total 2020 purchases of aluminum foil
<b>Purchases that did not require domestic product</b>	%
<b>Purchases that were required by law or regulation to be domestic product</b> (e.g., government purchases under "Buy American" provisions)	%
<b>Purchases that were not required by law or regulation, but were required by your customers to be domestic product</b>	%
<b>Purchases that were required to be domestic product for other reasons</b> (explain: _____)	%
<b>Total</b> (should sum to 100.0%)	0.0 %

- III-10. **Conditions of competition.**--

- (a) Is the aluminum foil market subject to business cycles and/or other conditions of competition distinctive to aluminum foil?

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to question III-11.
<input type="checkbox"/> Yes-Business cycles (e.g. seasonal business)	
<input type="checkbox"/> Yes-Other distinctive conditions of competition	

- (b) Have there been any changes in the business cycles or conditions of competition for aluminum foil since January 1, 2018?

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

- III-11. **Decisions based on producer and country-of-origin.**--How often does your firm, and if known, do your customers, make purchasing decisions involving aluminum foil based on its producer or country of origin?

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

- III-12. **Availability of supply.**--Has the availability of aluminum foil in the U.S. market changed since January 1, 2018?

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

- III-13. **Supply constraints.**--Has any firm refused, declined, or been unable to supply your firm with aluminum foil at any time between January 1, 2018 and September 29, 2020 (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, impact from changes in operations listed in II-2a, COVID-19, etc.)?

No	Yes	If yes, please describe, including the reason, timing, and duration of the constraint.
<input type="checkbox"/>	<input type="checkbox"/>	

(b) Has your firm experienced any supply constraints since the petition was filed on September 29, 2020?

No	Yes	If yes, please describe, including the reason, timing, and duration of the constraint.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-14. **Availability of specific product types.**--Are certain grades/types/sizes of aluminum foil only available from certain country sources?

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

- III-15. **Purchasing frequency.**--

(a) How frequently does your firm make purchases of aluminum foil (check one)?

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

(b) Has this purchasing frequency changed since January 1, 2018?

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

III-16. **Raw material prices.**—

- (a) Is your firm familiar with the prices for raw materials used in the production of aluminum foil?

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

- (b) Has information on raw material prices affected your firm's negotiations or contracts to purchase aluminum foil since 2018?

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

- III-17. **Number of suppliers contacted.**--How many suppliers does your firm generally contact before making a purchase? Between \_\_\_\_ and \_\_\_\_ firms

- III-18. **Supplier negotiations.**--Do your firm's purchases of aluminum foil usually involve negotiations between supplier and purchaser?

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

- III-19. **Price negotiation elements.**—Which of the following price elements does your firm negotiate?

Element	No	Yes	If yes, please describe.
London Metal Exchange and Midwest Premium raw material costs	<input type="checkbox"/>	<input type="checkbox"/>	
Other raw material costs	<input type="checkbox"/>	<input type="checkbox"/>	
Conversion price	<input type="checkbox"/>	<input type="checkbox"/>	
Other	<input type="checkbox"/>	<input type="checkbox"/>	

III-20. **Change in suppliers.**--Has your firm changed suppliers since January 1, 2018?

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

III-21. **New suppliers.**--Are you aware of any new suppliers, either foreign or domestic, that have entered the market since January 1, 2018?

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

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

If yes, provide the following information.

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

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

III-23. **Failure to certify.**--Since January 1, 2018, have any domestic or foreign producers failed in their attempts to certify or qualify their aluminum foil with your firm or have any producers lost their approved status?

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

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

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

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

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

- III-26. **Quality characteristics.**--What characteristics does your firm consider when evaluating the quality of aluminum foil?

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- III-27. **Minimum quality.**--How often does aluminum foil from the following countries meet minimum quality specifications for your uses or your customers' uses?

Source	Always	Usually	Sometimes	Rarely or never	Don't know
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Armenia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brazil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oman	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Russia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

- III-29. **Price leaders.**--A price leader is defined as (1) one or more firms that initiate a price change, either upward or downward, that is followed by other firms, or (2) one or more firms that have a significant impact on prices. *A price leader is not necessarily the lowest-priced supplier.*

Please list the names of any firms you considered price leaders in the aluminum foil market since January 1, 2018.

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

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

- (a) Since January 2018, did your firm import and/or purchase imports of aluminum foil from Armenia, Brazil, Oman, Russia, and Turkey instead of purchasing U.S.-produced aluminum foil? Respond for each subject country.

Source	Yes (also respond to parts (b) and (c))	No (If "No" for all countries, skip to next question)
Armenia	<input type="checkbox"/>	<input type="checkbox"/>
Brazil	<input type="checkbox"/>	<input type="checkbox"/>
Oman	<input type="checkbox"/>	<input type="checkbox"/>
Russia	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	<input type="checkbox"/>	<input type="checkbox"/>

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

Source	Yes	No
Armenia	<input type="checkbox"/>	<input type="checkbox"/>
Brazil	<input type="checkbox"/>	<input type="checkbox"/>
Oman	<input type="checkbox"/>	<input type="checkbox"/>
Russia	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	<input type="checkbox"/>	<input type="checkbox"/>

- (c) If you responded "Yes" to part (a), was price a primary reason for importing and/or purchasing subject imports rather than domestic product?

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2018 (in pounds)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic prod
Armenia	<input type="checkbox"/>		<input type="checkbox"/>	
Brazil	<input type="checkbox"/>		<input type="checkbox"/>	
Oman	<input type="checkbox"/>		<input type="checkbox"/>	
Russia	<input type="checkbox"/>		<input type="checkbox"/>	
Turkey	<input type="checkbox"/>		<input type="checkbox"/>	

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

- (a) Since January 1, 2018, in connection with a sale or offer to sell aluminum foil to your firm, did U.S. producers reduce their prices of domestically produced aluminum foil in order to compete with lower-priced imports of aluminum foil from the subject countries? Respond for each subject country.

<b>Source</b>	<b>Yes (also respond to question part (b))</b>	<b>No (If “No” for all countries, skip to next question)</b>	<b>Don’t know</b>
Armenia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brazil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oman	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Russia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If your firm responded “yes” to any of the above countries, please provide an estimate of the reduction in U.S. producers’ prices and any additional explanations.

<b>Source</b>	<b>Estimated reduction in U.S. prices (percent)</b>	<b>Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors</b>
Armenia	%	
Brazil	%	
Oman	%	
Russia	%	
Turkey	%	

## **PART IV.—PRODUCT COMPARISONS**

IV-1. **Interchangeability.**--Is aluminum foil 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	Armenia	Brazil	Oman	Russia	Turkey	Other countries
United States						
Armenia						
Brazil						
Oman						
Russia						
Turkey						

For any country-pair producing aluminum foil which is *sometimes* or *never* interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:

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

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	Armenia	Brazil	Oman	Russia	Turkey	Other countries
United States						
Armenia						
Brazil						
Oman						
Russia						
Turkey						

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's purchases of aluminum foil, identify the country-pair and report the advantages or disadvantages imparted by such factors:

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

*If you are unfamiliar with the product from a particular country, please leave the boxes for those country comparisons blank.*

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

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

IV-3. Continued.

*If you are unfamiliar with the product from a particular country, please leave the boxes for those country comparisons blank.*

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

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

IV-3. Continued.

*If you are unfamiliar with the product from a particular country, please leave the boxes for those country comparisons blank.*

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

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



***If you are unfamiliar with the product from a particular country, please leave the boxes for those country comparisons blank.***

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

**PART V.—ADDITIONAL INFORMATION**

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

--

- V-2. **OMB statistics.**--Please report the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 25 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

# HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at: [LINK](#)

***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:** **FOIL**

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

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

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