### **U.S. IMPORTERS' QUESTIONNAIRE**

### FREIGHT RAIL COUPLER SYSTEMS AND COMPONENTS FROM CHINA

This questionnaire must be received by the Commission by October 13, 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 certain freight rail coupler systems and components thereof ("FRC") from China (Inv. Nos. 701-TA-670 and 731 TA-1570 (Preliminary)). 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)).

City	State	Zip Code	
Website			
Has your firm imported FRC (as defined on next page) from any country at any time since January 1, 2018?			
NO (Sign the	certification below and promptly return onl	this page of the questio	nnaire to the Commission)
YES (Complet	te all parts of the questionnaire, and return t	ne entire questionnaire t	o the Commission)
e and belief and unders	CERTIFICATION erein supplied in response to this qu stand that the information submitted is o grant consent for the Commission,	estionnaire is comple subject to audit and	verification by the Com
e and belief and unders this certification I also on provided in this questission on the same or sidersigned, acknowledge g or other proceedings (a) for developing or nand evaluations relating; or (ii) by U.S. govern	erein supplied in response to this questand that the information submitted is grant consent for the Commission, stionnaire and throughout this proceed	estionnaire is comple subject to audit and and its employees and ing in any other impo se to this request for the Commission, its en ted proceeding, or (b perations of the Com	verification by the Comnd contract personnel, rt-injury proceedings contraction and through the contraction and the contractio
e and belief and unders this certification I also on provided in this questission on the same or sidersigned, acknowledge g or other proceedings (a) for developing or nand evaluations relating; or (ii) by U.S. govern	erein supplied in response to this questand that the information submitted is o grant consent for the Commission, stionnaire and throughout this proceed milar merchandise.  That information submitted in responsay be disclosed to and used: (i) by the maintaining the records of this or a relegate the programs, personnel, and coment employees and contract personnel.	estionnaire is comple subject to audit and and its employees and ing in any other impo se to this request for the Commission, its en ted proceeding, or (b perations of the Com	verification by the Com nd contract personnel, rt-injury proceedings co r information and thro nployees and Offices, a o) in internal investigati nmission including und rity purposes. I underst

#### PART I.—GENERAL INFORMATION

Background. -- This proceeding was instituted in response to petitions filed on September 29, 2021, by the Coalition of Freight Coupler Producers. The Coalition is comprised of Amsted Rail Company, Inc., Chicago, IL and McConway & Torley LLC, Pittsburgh, PA. Countervailing and 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 dumping. Questionnaires and other information pertinent to this proceeding are available at

https://www.usitc.gov/investigations/701731/2021/freight\_rail\_coupler\_systems\_and\_components\_chi na/preliminary.htm

FRC covered by these investigations are certain freight rail car coupler systems and components thereof. Subject freight rail car coupler systems are composed of knuckles, coupler bodies, coupler yokes, and follower blocks. Subject coupler systems and components are included within the scope whether finished or unfinished, whether assembled fully or partially or unassembled, whether mounted or unmounted, or if joined with nonsubject merchandise, such as other non-subject system parts or a completed rail car. Only the subject coupler system and components are subject to duties if imported with or mounted with other nonsubject merchandise. Subject freight rail coupler components imported individually independent from a coupler system are also included within the scope of the investigations.

A coupler system (also known as a "coupling") is the mechanism used to connect freight rail cars together. The knuckles function as interlocking parts of the couplers that close automatically due to the force of the freight rail cars coming together. The coupler yoke functions as the pocket for the draft gear that connect couplers to the freight car. The follower block is a rectangularly shaped block of steel that is interposed between the back end of the coupler and the front working end of the draft gear.

The products covered by the scope of these investigations, when imported into the United States, meet, intend to meet, or exceed the Association of American Railroads ("AAR") specifications of M211, "Foundry and Product Approval Requirements for the Manufacture of Couplers, Coupler Yokes, Knuckles, Follower Blocks, and Coupler Parts" and/or AAR M215 "Coupling Systems," or other equivalent domestic or international standards (including any revisions to the standard(s)). Subject merchandise include: (1) E and E/F couplers; (2) F couplers; (3) E yokes; (4) F yokes; (5) E and F knuckles; and (6) and E and F type follower blocks. The inclusion, attachment, joining, or assembly of non-subject components with subject components or systems does not remove the subject components or systems from the scope.

For purposes of this investigation, the country of origin for subject coupler systems and components, whether fully assembled, unfinished, semi-finished, or finished, or attached to a rail car, is the country where the subject coupler components were cast and/or forged. Subject merchandise includes coupler components as defined above that have been further processed or further assembled, creating a more complex assembly in a third country, including those coupler components attached to a rail car in third countries. Only the value of the subject merchandise if entered attached to other non-subject products including the rail car will be subject to duties.

FRC are currently imported under subheading 8607.30.10 of the Harmonized Tariff Schedule of the United States (HTSUS). When presented to U.S. Customs and Border Protection attached to finished rail cars, subject merchandise may also be imported under HTSUS heading 8606, and the duty rates provided in heading 9803.00 may be claimed if such rail cars are imported as an Instrument of International Traffic. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Importer</u>.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing FRC (as defined above) into the United States from a foreign manufacturer or through its selling agent.

<u>Reporting of information</u>.--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.

<u>Confidentiality</u>.--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.

<u>Verification</u>.--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.

<u>Valid number error messages.</u>—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 Stamen Borisson (202-205-3125, <a href="mailto:stamen.borisson@usitc.gov">stamen.borisson@usitc.gov</a>).

<u>D-GRIDS tool.</u>--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 macroenabled MS Excel file available for download from the Commission's generic questionnaires webpage (<a href="https://www.usitc.gov/trade\_remedy/question.htm">https://www.usitc.gov/trade\_remedy/question.htm</a>) 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. <u>OMB statistics</u>.--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. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire.

<u>establishment</u> Each facility of a fifth involved in the <u>importation</u> of FAC, including auxiliary
facilities operated in conjunction with (whether or not physically separate from) such facilities.

"Fatablishment" Fach facility of a firm involved in the importation of EDC including auxiliary

U.S. Im	porters' Questionnaire	e - FRC (Pre	liminary)	Page 5
I-2b.	Stock symbol inform stock exchange and t		our firm or parent firm is publicly traded bol:	, please specify the
I-2c.		•	or parent firm is represented by external he name of the law firm and the lead att	
	Law firm:			
	Lead attorney(s):			
I-3.	OwnershipIs your f	firm owned	, in whole or in part, by any other firm?	
	□ No □ Y	esList the	following information, relating to the ult	imate parent/owner.
	Firm name		Country	Extent of ownership (percent)
I-4.	foreign, that are engaged in exporting	aged in imp FRC from (	Does your firm have any related firms, eit orting FRC from China into the United St. China to the United States?	
			-	a (C)
	Firm name		Country	Affiliation

Country		Affiliation
Takes title to the	Consignee of the	Customs bro
imported product(s)	imported products(s)	freight forw
	may be applicable.	Takes title to the Consignee of the

I-8. <u>FTZ, TIB, or bonded warehouses</u>.--Please indicate whether your firm enters FRC into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports FRC 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		
Bonded warehouses		
Temporary importation under bond		

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-Please specify.

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

Further information on this part of the questionnaire can be obtained from Stamen Borisson (202-205-3125, <a href="mailto:stamen.borisson@usitc.gov">stamen.borisson@usitc.gov</a>). Supply all data requested on a <a href="mailto:calendar-year">calendar-year</a> basis.

II-1.	<b>Contact inform</b>	<u>Contact information</u> Please identify the responsible individual and the manner by which				
	Commission st	aff may contact that individual regarding	ng the confidential information submitted			
	in part II.					
		T	1			
	Name					
	Title					
	Email					
	Tolonhono					

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the importation of FRC since January 1, 2018.

(ched	ck as many as appropriate)	(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)
	Office/warehouse openings	
	Office/warehouse closings	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Prolonged shutdowns or importation curtailments	
	Revised labor agreements	
	Other (e.g., technology)	

U.S. Importers	' Questionnaire	- FRC (Preliminary)
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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
	your firm's supply chain arrangements, importation, employment, and shipments relating to
	FRC?

No	If yes, describe these changes including a separate discussion of the (a) supply chain impact, (b) importation and shipment impact, and (c) employment impact of the COVID-19 pandemic.

II-3a.	Arranged imports Has your firm imported or arranged for the importation of FRC for delivery
	after June 30, 2021?

"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.

	Period						
Source	Jul-Sep 2021 Oct-Dec 2021 Jan-Mar 2022 Apr-						
	Quantity (in 1,000 pounds)						
China							
All other sources							

II-3b. <u>Imports in the 12-month period preceding the petition</u>.--Has your firm imported FRC from any source between September 2020 through August 2021? (i.e., the last four months in 2020 and first eight months in 2021 combined)

No	Yes	
		If yes, report the quantity of such import below by source.

Quantity (in 1,000 pounds)					
Source	September 2020 through August 2021				
China					
All other sources					

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

### **Business Proprietary**

U.S. Importers' Questionnaire - FRC (Preliminary)	Page 10

#### **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" – Product consumed internally by your firm. Such transactions are valued at fair market value.

"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.

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>U.S. imports from China</u>.—Report your firm's imports and your firm's shipments and inventories of FRC imported from China by your firm during the specified periods.

# China

Qu	antity ( <i>in 1,00</i>	00 pounds), value	e ( <i>in \$1,000</i> )		
	Calendar year			Januar	y-June
ltem	2018	2019	2020	2020	2021
Beginning-of-period inventories (quantity) (A)					
Imports: <sup>1</sup> Standalone complete units or components:  Quantity (B)					
Value (C)					
Attached to new railcars or other out-of-scope system parts: <sup>2</sup> Quantity (D)					
Value (E)					
U.S. shipments: Commercial shipments: Quantity (F)					
Value (G)					
Internal consumption: <sup>3</sup> Quantity (H)					
Value² (I)					
Transfers to related firms: <sup>3</sup> Quantity (J)					
Value² (K)					
Export shipments: <sup>4</sup> Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					
<sup>1</sup> Please identify the foreign producers <sup>2</sup> Describe the out-of-scope products to your firm was able to separate out (estime out-of-scope products in the data reported.  Please also confirm your firm is represented by the country of origin of the FRC not the downstream product contain.  Internal consumption and transfers to basis for valuing these transactions in your firm's principal export resulting these transactions.	o which the FRO nates are accepted above: [ ] Yeeporting the date overall importing the FRC. o related firms our records, pleanuld be based of	C is attached at the table) the weight a es, please describe ta based on the coted products: [ ] Y must be valued at ase specify that base	and the value spoot how these quare puntry of origin cles, data are base fair market values (e.g., cost, cos	ecific to the FRC at ntity and values we of the FRC, which med on the country of e. If your firm use:	tached to the re arrived at: nay not of origin of the

### II-5a. U.S. imports from China.—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and C), less total shipments (i.e., lines D, F, H, J and N). 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.

	Calendar year			January-June	
Reconciliation	2018	2019	2020	2020	2021
A + B + D - F - H - J - L - N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0

<sup>&</sup>lt;sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: \_\_\_\_\_.

II-5b. <u>Channels of distribution: China</u>.--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

	Calendar year			January-June		
Item	2018	2019	2020	2020	2021	
	Quantity (in 1,000 pou			unds)		
Channels of distribution: U.S. shipments: to OEM market (O)						
to replacement market (P)						

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines O and P) in each time period equal the quantity reported for U.S. shipments (i.e., lines F, H, J) 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.

	Calendar year			January-June	
Reconciliation item	2018	2019	2020	2020	2021
O + P - F - H - J = zero ("0"), if not					
revise.	0	0	0	0	0

II-5c. <u>U.S. shipments by product type.</u>--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 product type during the specified periods.

"Complete FRC" – A complete FRC is an FRC that is shipped as a complete system, regardless of whether any of the parts require on-site assembly by the customers or was shipped fully assembled.

"FRC Component" – An in-scope component of an FRC shipped as an individual component or series of components comprising less than a complete FRC.

	Calendar year				
Item	2018	2019	2020		
U.S. shipments:					
Complete FRC: Quantity in 1,000 pounds (Q)					
Quantity in units (R)					
Value <i>in \$1,000</i> (S)					
FRC components: Knuckles Quantity in 1,000 pounds (T)					
Quantity in units (U)					
Value <i>in \$1,000</i> (V)					
Other in-scope components <sup>1</sup> :  Quantity in 1,000 pounds (W)					
Quantity in units (X)					
Value in \$1,000 (Y)					

<u>RECONCILIATION OF SHIPMENTS.</u>—Please ensure that the quantities (in 1,000 pounds) and values reported for U.S. shipments in this question (i.e., lines Q through W) in each time period equal the quantity and values reported for U.S. shipments in previous question II-9 (i.e., lines D through K) 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.

	Calendar year				
Reconciliation	2018	2019	2020		
Quantity: $F + H + J - Q - T - W = zero$					
("0"), if not revise	0	0	0		
<b>Value</b> : $G + I + K - S - V - Y = zero, ("0"), if$					
not revise.	0	0	0		

II-6a. <u>U.S. imports from the United States</u>.—Report your firm's imports and your firm's shipments and inventories of FRC (re)-imported from the United States by your firm during the specified periods.

# **United States**

Standalone complete units or components: Quantity (B) NA	Qua	ntity ( <i>in 1,000</i>	pounds), valu	e (in \$1,000)		
Beginning-of-period inventories (quantity) (A)  Imports:¹ Standalone complete units or components: Quantity (B) NA			Calendar year		Januar	y-June
(quantity) (A)   Imports:¹   Standalone complete units   or components:   Quantity (B) NA   NA NA   NA NA   NA NA   Attached to new railcars or other out-of-scope system parts:²   Quantity (D)   Value (E)   U.S. shipments:   Commercial shipments:   Quantity (F)	ltem	2018	2019	2020	2020	2021
Imports:¹ Standalone complete units or components: Quantity (B) NA	Beginning-of-period inventories					
Standalone complete units or components: Quantity (B) NA	(quantity) (A)					
or components:  Quantity (B)  NA  NA  NA  NA  NA  NA  NA  NA  NA  N	Imports:1					
Quantity (B)       NA       NA       NA       NA       NA         Value (C)       NA       NA       NA       NA       NA         Attached to new railcars or other out-of-scope system parts:²       Quantity (D)       Quantity (D)       Quantity (E)       Quantity (E)       Quantity (F)	-					
Value (C)  NA  NA  NA  NA  NA  NA  NA  NA  NA  N	-					
Attached to new railcars or other out-of-scope system parts: <sup>2</sup> Quantity (D) Value (E)  U.S. shipments: Commercial shipments: Quantity (F)	Quantity (B)	NA	NA	NA	NA	NA
other out-of-scope system parts:² Quantity (D)  Value (E)  U.S. shipments: Commercial shipments: Quantity (F)	Value (C)	NA	NA	NA	NA	NA
parts: <sup>2</sup> Quantity (D)  Value (E)  U.S. shipments: Commercial shipments: Quantity (F)	Attached to new railcars or					
Quantity (D)  Value (E)  U.S. shipments:  Commercial shipments:  Quantity (F)	other out-of-scope system					
Value (E)  U.S. shipments: Commercial shipments: Quantity (F)	parts: <sup>2</sup>					
U.S. shipments: Commercial shipments: Quantity (F)	Quantity (D)					
Commercial shipments:  Quantity (F)	Value (E)					
Commercial shipments:  Quantity (F)	U.S. shipments:					
Quantity (F)	-					
	•					
Value (G)	Value (G)					
Internal consumption: <sup>3</sup>	Internal consumption:3					
Quantity (H)	-					
Value <sup>2</sup> (I)	,					
Transfers to related firms: <sup>3</sup>	Transfers to related firms: <sup>3</sup>					
Quantity (J)						
Value <sup>2</sup> (K)	Value² (K)					
Export shipments: <sup>4</sup>	Export shipments:4					
Quantity (L)						
Value (M)	Value (M)					
End-of-period inventories	End-of-period inventories					
(quantity) (N)	•					
<sup>1</sup> Please identify the U.S. producers, if known:		s, if known: .				
<sup>2</sup> Describe the out-of-scope products to which the FRC is attached at the time of importation: Please	I		FRC is attached	at the time of in	nportation:	Please
confirm that your firm was able to separate out (estimates are acceptable) the weight and the value specific to the	confirm that your firm was able to se	parate out (estir	mates are accep	table) the weigl	nt and the value	specific to the
FRC attached to the out-of-scope products in the data reported above: [ ] Yes, please describe how these quantity			-			
and values were arrived at: Please also confirm your firm is reporting the data based on the country of						
origin of the FRC, which may not necessarily be the country of origin of the overall imported products: [ ] Yes, data						s: [ ] Yes, data
are based on the country of origin of the FRC not the downstream product containing the FRC.						
<sup>3</sup> 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.):						t plus <i>, etc</i> .):
<ul> <li>However, the data provided above in this table should be based on fair market value.</li> <li>Identify your firm's principal export markets:</li> </ul>			nouid be based	on fair market v	aiue.	

II-7a. <u>U.S. imports from all other sources</u>.—Report your firm's imports and your firm's shipments and inventories of FRC imported from all other sources by your firm during the specified periods.

# All other sources

Qu	antity ( <i>in 1,00</i>	0 pounds), valu	e ( <i>in \$1,000</i> )			
		Calendar year		January-June		
Item	2018	2019	2020	2020	2021	
Beginning-of-period inventories (quantity) (A)						
Imports: <sup>1</sup> Standalone complete units or components:  Quantity (B)						
Value (C)						
Attached to new railcars or other out-of-scope system parts: <sup>2</sup> Quantity (D)						
Value (E)						
U.S. shipments: Commercial shipments: Quantity (F)						
Value (G)						
Internal consumption: <sup>3</sup> Quantity (H)						
Value² (I)						
Transfers to related firms: <sup>3</sup> Quantity (J)						
Value² (K)						
Export shipments: <sup>4</sup> Quantity (L)						
Value (M)						
End-of-period inventories (quantity) (N)						
1 Please identify the foreign producers 2 Describe the out-of-scope products to your firm was able to separate out (estimout-of-scope products in the data reporte Please also confirm your firm is renecessarily be the country of origin of the FRC not the downstream product contain 3 Internal consumption and transfers to basis for valuing these transactions in you the data provided above in this table sho 4 Identify your firm's principal export in	o which the FRC lates are accepted above: [ ] Ye eporting the date overall importaing the FRC. The present of t	c is attached at the table) the weight as s, please describe ta based on the core and products: [ ] Y must be valued at se specify that base	and the value spee how these quan puntry of origin o es, data are base fair market value sis (e.g., cost, cos	ecific to the FRC at tity and values we f the FRC, which n ed on the country of e. If your firm use	tached to the ere arrived at: nay not of origin of the s a different	

### II-7a. U.S. imports from all other sources.—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.—Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and C), less total shipments (i.e., lines D, F, H, J and N). 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.

	Calendar year			January-June		
Reconciliation	2018 2019 2020			2020	2021	
A + B + D - F - H - J - L - N = should equal zero ("0") or provide an						
explanation. <sup>1</sup>	0	0	0	0	0	
1 Evaluation if the calculated fields ab		ماهم مميرامين مماه				

<sup>&</sup>lt;sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:

II-7b. <u>Channels of distribution: all other sources</u>.--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

	Calendar year			January-June		
Item	2018	2019	2020	2020	2021	
	Quantity (in 1,000 pounds)					
Channels of distribution: U.S. shipments: to OEM market (O)						
to replacement market (P)						

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines O and P) in each time period equal the quantity reported for U.S. shipments (i.e., lines F, H, J) 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.

		Calendar year	January-June		
Reconciliation item	2018	2019	2020 2021		
O + P - F - H - J = zero ("0"), if not					
revise.	0	0	0	0	0

II-7c. <u>U.S. shipments by product type.</u>--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 product type during the specified periods.

"Complete FRC" – A complete FRC is an FRC that is shipped as a complete system, regardless of whether any of the parts require on-site assembly by the customers or was shipped fully assembled.

"FRC Component" – An in-scope component of an FRC shipped as an individual component or series of components comprising less than a complete FRC.

	Calendar year					
Item	2018	2019	2020			
U.S. shipments:						
Complete FRC:						
Quantity in 1,000 pounds (Q)						
Quantity in units (R)						
Value <i>in \$1,000</i> (S)						
FRC components:						
Knuckles						
Quantity in 1,000 pounds (T)						
Quantity in units (U)						
Value <i>in \$1,000</i> (V)						
Other in-scope components <sup>1</sup> :						
Quantity in 1,000 pounds (W)						
Quantity in units (X)						
Value <i>in \$1,000</i> (Y)						
<sup>1</sup> Please identify these components (e.g. coupler	bodies, coupler yokes, fol	lower blocks, etc.)				

<u>RECONCILIATION OF SHIPMENTS.</u>—Please ensure that the quantities (in 1,000 pounds) and values reported for U.S. shipments in this question (i.e., lines Q through W) in each time period equal the quantity and values reported for U.S. shipments in previous question II-9 (i.e., lines D through K) 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.

		Calendar year				
Reconciliation	2018	2019	2020			
Quantity: $F + H + J - Q - T - W = zero$						
("0"), if not revise	0	0	0			
<b>Value</b> : $G + I + K - S - V - Y = zero, ("0"), if$						
not revise.	0	0	0			

	<u>Semi-finished product analysis</u> Please answer the following questions regarding the differences and similarities in unfinished product(s) and finished product(s) in this proceeding as defined below:							
complete system, regardles	"Finished product(s)" = "Complete FRC" – A complete FRC is an FRC that is shipped as a complete system, regardless of whether any of the parts require on-site assembly by the customers or was shipped fully assembled.							
•	•	r-scope component of an FRC shipped as an prising less than a complete FRC.						
(a) Are there uses for the uproduct(s)?	unfinished product(s) ot	her than for the production of the finished						
No	Yes	If yesPlease describe these uses.						
(b) Is the market for unfini product(s)?	shed product(s) separa	te and distinct from the market for finished						
No	Yes	If yesPlease describe how they are separate and distinct.						
	П							
(c) Are there differences i product(s) and finished	• •	ristics and functions of the unfinished						
No	Yes	If yesPlease describe these differences.						
(d) Is there a significant different finished product(s)?	fference in the cost or v	alue between unfinished product(s) and						
No	Yes	If yesPlease describe these differences.						
	-	nsform the unfinished product(s) into the rly labor or capital intensive?						
No	Yes	If yesPlease describe the labor or capital intensively of the conversion process.						
_	_	1						

I-9.	Transfers to related firmsIf 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.
I-10.	Other explanationsIf 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.

#### PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Kyle Westmoreland (202-205-2184, Kyle.Westmoreland@usitc.gov).

III-1. <u>Contact information.</u>--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. customers since January 1, 2018 of the following products your firm imported from China:
  - **Product 1.--**SE60, Grade E steel complete coupler assembly, double shelves, 21.5" shank length, produced to AAR M-211 and/or AAR M-215 specifications.
  - **Product 2.--**SBE60, grade E steel complete coupler assembly, bottom shelf, 21.5" shank length, produced to AAR M-211 and/or AAR M-215 specifications.
  - **Product 3.-**-E50 coupler knuckle, grade E steel, produced to AAR M-211 and/or AAR M-215 specifications.<sup>1</sup>
  - **Product 4.--**SY coupler yoke, grade E steel, produced to AAR M-211 and/or AAR M- 215 specifications.<sup>2</sup>

Please note that values should be <u>f.o.b.</u>, <u>U.S.</u> <u>point of shipment</u> 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 rebates).

During January 2018-June 2021, did your firm import from China and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

YesPlease complete the following pricing data table as appropriate.
NoSkip to question III-3.

<sup>&</sup>lt;sup>1</sup> Pricing product 3 is an individual knuckle sold separately from a complete coupler system. Do not report or include knuckles sold as part of a complete coupler system.

<sup>&</sup>lt;sup>2</sup> Pricing product 4 is an individual yoke sold separately from a complete coupler system. Do not report or include yokes sold as part of a complete coupler system.

Product 2: Product 3: Product 4:

III-2a. <u>Price data</u>.--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from China and sold by your firm.

# China

Report data in <u>units</u> and <u>actual dollars</u> (not 1,000s).

	(Quantity in units, value in dollars)								
	Produ	ict 1	Produ	ıct 2	Produ	Product 3		ict 4	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	
2018:									
January-March									
April-June									
July-September									
October-December									
2019:									
January-March									
April-June									
July-September									
October-December									
2020:									
January-March									
April-June									
July-September									
October-December									
2021:									
January-March									
April-June									
<sup>1</sup> Net values (i.e., gross goods), f.o.b. your firm's U. the sale occurred. <sup>2</sup> Pricing product defini <b>Note</b> -If your firm's product provide a description of you	S. point of shi itions are prov ct does not ex	pment. Ple vided on the actly meet	ase subtract and effirst page of the product sp	ny discounts Part III. Decifications	s, rebates, and	returns fron	n the quarter e specified pro	in which	
Product 1:									

III-2b. <u>Price data checklist.</u>--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 for value data ( <i>not</i> \$1,000)?	
	In units for quantity data (not 1,000 pounds)?	
	F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	
	Net of all discounts and rebates?	
	Have discounts, rebates, and returns been credited to the quarter in which the sale occurred?	
	Quantities do not exceed commercial shipments reported in part II in each year?	
	Explanation(s) for any boxes not checked:	
III-2c.	Pricing data methodologyPlease describe the method and the kinds of documents/that were used to compile your price data.	records

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.	impor consu	This question requests quarterly quantity and landed-duty paid value data for your firm's imports of product 1 and/or product 2 defined on the first page of Part III for internal consumption from China since January 1, 2018. These are imports that your firm does not resell as FRC.				
		During January 2018-June 2021, did your firm import product 1 and/or product 2 listed on the first page of Part III from China for internal consumption?				
		YesPlease complete the following table as appropriate.				
		NoSkip to question III-4.				

III-3a. <u>Imports for internal use.</u>—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from China and used by your own firm. These are imports that your firm does not resell as FRC.

Please note that values should be <u>landed</u>, <u>duty-paid</u> (<u>LDP</u>) 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

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

Prod Quantity	uct 2 LDP Value
Quantity	LDP Value
	1

<sup>&</sup>lt;sup>1</sup> 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). See "Import values" definition in Part II (Trade and Related Information – Definitions).

NoteIf 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:

<sup>&</sup>lt;sup>2</sup> Pricing product definitions are provided on the first page of Part III.

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 FRC rather than purchase from a U.S. producer or importer of FRC.

II-3b.	Additio	nal costs for your	firm's i	mports of FRC for y	your firm's internal use.—	
	i.	U.S. producer or i warehousing/inve	importe entory c	r (e.g., logistical or	mporting FRC rather than pusue supply chain management of ance or other risk managen	costs,
		□ No	Yes—	Please answer par	ts ii, iii, and iv.	
	ii.	compared to LDP producer or impo activities, either coinclude any costs	value) vorter. (Red directly of that als	when importing FRI eport only the port or indirectly, and no o would be incurre	tional cost incurred (as a pe C rather than purchasing fro ion that is related to your fi ot already included in the LI d if your firm purchased the compared to LDP value.	om a U.S. rm's importing DP value. Do <u>NOT</u>
	iii.	estimate each cos and the portion o either directly or	st (in pe of each c indirect	rcent) compared to ost that was relate ly, and that are not	tional costs incurred by you the cost of importing. (Onl d to your firm's importing a already included in the LDF n purchasing FRC from a U.S	y report costs ctivities for FRC, value. Do <u>NOT</u>
				Estimated		
				percentage		
		Costs		compared to LDF value (percent)	Explanati	on
		Costs		value (percent)	•	011
				%		
				%	Ó	
				%	Ó	
	iv.	importing FRC dir	ectly co		costs (beyond the purchase ditional costs your firm incu	
	iv.	importing FRC dir	ectly co	mpare with the ad	ditional costs your firm incu	
II-3c.	<u>Decisio</u>	importing FRC dir purchasing from a	ectly co a U.S. pr	mpare with the ad roducer or U.S. imp	ditional costs your firm incu	rs when
II-3c.	<b>Decisio</b> to impo	importing FRC dir purchasing from a	source(	mpare with the ad roducer or U.S. imp	ditional costs your firm incu orter.	rs when

answer parts iii and iv.)

Imports are priced lower when

Not including the additional costs above

Including the additional costs above

III-3d. I	Benefits	of im	porting	FRC.
-----------	----------	-------	---------	------

importer or from a U.S. producer.	ing FRC instead of purchasing FRC from a U.S.
·	RC your firm imported from China are priced ased from a U.S. importer or U.S. producer?

No

iii. Please estimate your firm's savings by importing FRC 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-3b).

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-3diii (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-3diii based on	√ if Yes
Previous company transactions	
Market research	
Other – Please explain	

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.

U.S. Importers	' Questionnaire -	FRC (Preliminary)
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III-4.	Price settingHow does your firm determine the prices that it charges for sales of FRC (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

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

III-6. <u>Pricing terms.--</u>On what basis are your firm's prices of imported FRC from China usually quoted *(check one)*?

Delivered	F.o.b.	If f.o.b., specify point

III-7. <u>Contract versus spot</u>.--Approximately what share of your firm's sales of FRC imported from China in 2020 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

		Туре о	f sale			
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)	<b>Spot sales</b> (for a single delivery)	Total (shoul sum to 100.0%	d o
Share of 2020 sales	%	%	%	%	0.0	%

III-8. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for FRC imported from China (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	ltem	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	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
3.1.5/ 5.1 p.1.55	Both			
Indexed to raw	Yes			
material costs <sup>1</sup>	No			
Not applicab	le			
<sup>1</sup> Please identify the in	dexes used:	·		

III-9. <u>Lead times.</u>--What is your firm's share of sales of FRC imported from China 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 FRC?

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. Shi	pping	information	า
-------------	-------	-------------	---

(a)	Who generally arranges the transportation to your firm's customers' locations?  Your firm Purchaser (check one)
(b)	When your firm sells FRC imported from China, from where is it shipped?  Point of importation Storage facility (check one)

(c) Indicate the approximate percentage of your firm's sales of FRC imported from China 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. <u>Geographical shipments.</u>--In which U.S. geographic market area(s) has your firm sold FRC imported from China since January 1, 2018 (check all that apply)?

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

III-12.	<u>Inland transportation costs.</u> What is the approximate percentage of	the cost of FRC imported
	from China that is accounted for by U.S. inland transportation costs?	percent.

III-13. <u>End uses.</u>--List the end uses of the FRC that your firm imports. For each end-use product, what percentage of the <u>total cost</u> is accounted for by FRC and other inputs?

	Share of total cost	Total	
			(should sum to
End-use product	FRC	Other inputs	100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

		lo	YesP	lease fill ou	t the tab	le.		
		F	nd use in v	which this	На		nges in the pric	e of this substitute e for FRC?
	Substitute		substitute		No	Yes	Ехр	lanation
1.								
2.								
3.								
111 1		wn) for FR0	C has chan	ged since Ja	nuary 1	, 2018.	nand.	e of the United ends and describe
	the principal	Overall	No	Overall	Fluctua	ite witl	n	
	the principal	Overall increase	No change	Overall decrease	Fluctua no clea		-	nation and factors

U.S. Im	porters' Qu	ıestionnaiı	re - <b>FRC (Prelimin</b> a	Page 32			
III-16.		_	lave there been ar	ny significant changes in the product range, product mix or 8?			
	No	Yes	If yes, please des	cribe.			
III-17.			et subject to busin	ess cycles and/or other conditions of competition			
	Check all	that apply	<i>y</i> .	Please describe.			
		No		Skip to next question.			
			ness cycles (e.g. business)				
			r distinctive is of competition				
		(b) If yes, have there been any changes in the business cycles or conditions of competition for FRC since January 1, 2018?					
	No	Yes	If yes, describe	e.			
III-18.	since January 1, 2018 (examples includentry," declining to accept new custor			used, declined, or been unable to supply FRC at any time de placing customers on allocation or "controlled order ners or renew existing customers, delivering less than the eet timely shipment commitments, impact from changes			
	No	Yes	If yes, please des constraint.	cribe, including the reason, timing, and duration of the			

Ш	l-19.	Raw	materials
---	-------	-----	-----------

(a) How have FRC raw material costs 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 FRC.
Cost of raw materials					

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

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend
Cost of raw materials after section 232 tariffs imposed				

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

Factor	Overall Increase	No change	Overall Decrease	Fluctuate with no clear trend	Explanation
Prices for FRC					

III-20.	Impact of section 301 tariffsDid the imposition of tariffs on Chinese-origin products under
	section 301 have an impact on the FRC market in the United States?

Yes— Please indicate the impact in the table below.	No	Don't know

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 FRC market in the United States.
Supply of U.S produced FRC					
Supply of FRC imported from China					
Supply of FRC imported from other countries					
Prices for FRC					
Overall U.S. demand for FRC					
Raw material costs for FRC					

III-21. <u>Interchangeability</u>.--Is FRC 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 0 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	Other countries
United States		
China		

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

III-22. <u>Factors other than price.</u>--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between FRC 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 0 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	China	Other countries		
United States				
China				

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

III-23. <u>Customer identification.</u>--List the names and contact information for your firm's 10 largest U.S. customers for FRC since January 1, 2018. Indicate the share of the quantity of your firm's U.S. shipments of FRC that each of these customers accounted for in 2020.

Customer's name		Contact person	Email	Telephone	City	State	Share of 2020 sales (%)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

III-2	for which a na explanation in firm had in pro	Other explanationsIf 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.								

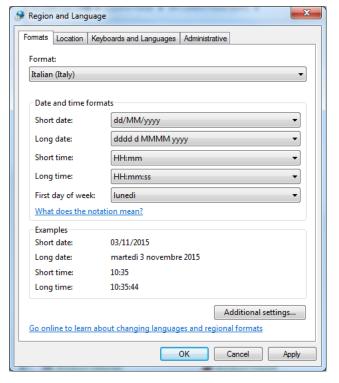
Correcting valid number error messages.--If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (i.e., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in the numeric form fields. This issue stems from your computer's number formatting setting (i.e., 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 and other 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 or other country number formatting, we believe this may cause this issue.

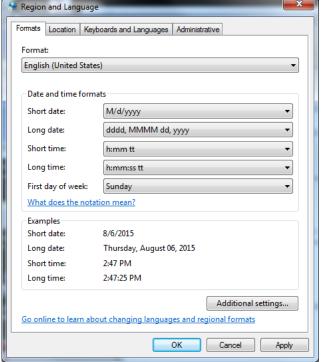
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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 tah
- 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 USITC importer questionnaire form. When you finish reporting the data then you can close the questionnaire and switch back to Italy (or your country) settings.





#### PART IV.-- COMPARABILITY OF FRC AND PASSENGER RAIL COUPLER SYSTEMS AND COMPONENTS

- V-1. Comparability of FRC and passenger rail coupler systems and components.--For each of the following indicate whether listed products are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.
  - F: fully comparable or the same, i.e., have no differentiation between them;
  - M: mostly comparable or similar;
  - S: somewhat comparable or similar;
  - N: never or not-at-all comparable or similar; or
  - 0: no familiarity with products.
  - (a) <u>Physical Characteristics and End Uses</u>.--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their physical characteristics and uses:
Freight vs passenger rail coupler systems		

(b) Interchangeability.--The ability to substitute the products in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>interchangeability</u> :
Freight vs passenger rail coupler systems		

(c) <u>Channels of distribution</u>.--Channels of distribution/market situation through which the products are sold (i.e., sold direct to end users, through wholesaler/distributors, etc.).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :
Freight vs passenger rail coupler systems		

(d) <u>Manufacturing facilities, production processes, and production employees</u>.--Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their manufacturing facilities, production processes, and production employees:
Freight vs passenger rail coupler systems		

(e) <u>Customer and producer perceptions</u>.--Perceptions as to the differences and/or similarities in the market (*e.g.*, sales/marketing practices).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their customer and product perceptions:
Freight vs passenger rail coupler systems		

(f) **Price**.--Whether prices are comparable or differ between the products.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :
Freight vs passenger rail coupler systems		

# **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://www.usitc.gov/investigations/701731/2021/freight\_rail\_coupler\_systems\_and\_components\_china/preliminary.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.

• <u>Upload via Secure Drop Box.</u>—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: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> Pin: RAIL

• E-mail.—E-mail the MS Word questionnaire to <a href="mailto:stamen.borisson@usitc.gov">stamen.borisson@usitc.gov</a>; 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.

<u>Parties to this proceeding</u>.—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).