

## U.S. PRODUCERS' QUESTIONNAIRE

### OIL COUNTRY TUBULAR GOODS FROM ARGENTINA, MEXICO, RUSSIA, AND SOUTH KOREA

This questionnaire must be received by the Commission by **October 20, 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 and antidumping duty investigations concerning oil country tubular goods ("OCTG") from Argentina, Mexico, Russia, and South Korea (Inv. Nos. 701-TA-671-672 and 731-TA-1571-1573 (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)).

Name of firm \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Website \_\_\_\_\_

Has your firm produced OCTG (as defined on next page) in the United States 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: **OCTG**)

#### CERTIFICATION

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

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

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

**PART I.—GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to petitions filed on October 6, 2021, by Borusan Mannesmann Pipe U.S., Inc., Baytown, Texas; PTC Liberty Tubulars LLC, Liberty, Texas; U.S. Steel Tubular Products, Inc., Pittsburgh, Pennsylvania; Welded Tube USA, Inc., Lackawanna, New York; and the United States Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC, Pittsburgh, Pennsylvania. 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/or dumping. Questionnaires and other information pertinent to this proceeding are available at [https://www.usitc.gov/investigations/701731/2021/oil\\_country\\_tubular\\_goods\\_octg\\_argentina\\_mexico/preliminary.htm](https://www.usitc.gov/investigations/701731/2021/oil_country_tubular_goods_octg_argentina_mexico/preliminary.htm)

**OCTG** covered by these investigations are certain oil country tubular goods (OCTG), which are hollow steel products of circular cross-section, including oil well casing and tubing, of iron (other than cast iron) or steel (both carbon and alloy), whether seamless or welded, regardless of end finish (e.g., whether or not plain end, threaded, or threaded and coupled) whether or not conforming to American Petroleum Institute (API) or non-API specifications, whether finished (including limited service OCTG products) or unfinished (including green tubes and limited service OCTG products), whether or not thread protectors are attached. The scope of the investigation also covers OCTG coupling stock.

Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise processed in a third country, including by performing any heat treatment, cutting, upsetting, threading, coupling, or any other finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the OCTG.

Excluded from the scope are: casing or tubing containing 10.5 percent or more by weight of chromium; drill pipe; unattached couplings; and unattached thread protectors.

OCTG are currently imported under the following statistical reporting numbers of the Harmonized Tariff Schedule of the United States (HTSUS): 7304.29.10.10, 7304.29.10.20, 7304.29.10.30, 7304.29.10.40, 7304.29.10.50, 7304.29.10.60, 7304.29.10.80, 7304.29.20.10, 7304.29.20.20, 7304.29.20.30, 7304.29.20.40, 7304.29.20.50, 7304.29.20.60, 7304.29.20.80, 7304.29.31.10, 7304.29.31.20, 7304.29.31.30, 7304.29.31.40, 7304.29.31.50, 7304.29.31.60, 7304.29.31.80, 7304.29.41.10, 7304.29.41.20, 7304.29.41.30, 7304.29.41.40, 7304.29.41.50, 7304.29.41.60, 7304.29.41.80, 7304.29.50.15, 7304.29.50.30, 7304.29.50.45, 7304.29.50.60, 7304.29.50.75, 7304.29.61.15, 7304.29.61.30, 7304.29.61.45, 7304.29.61.60, 7304.29.61.75, 7305.20.20.00, 7305.20.40.00, 7305.20.60.00, 7305.20.80.00, 7306.29.10.30, 7306.29.10.90, 7306.29.20.00, 7306.29.31.00, 7306.29.41.00, 7306.29.60.10, 7306.29.60.50, 7306.29.81.10, and 7306.29.81.50.<sup>1</sup> The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

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<sup>1</sup> Coupling stock may also be imported under HTSUS statistical reporting numbers: 7304.39.00.24, 7304.39.00.28, 7304.39.00.32, 7304.39.00.36, 7304.39.00.40, 7304.39.00.44, 7304.39.00.48, 7304.39.00.52, 7304.39.00.56, 7304.39.00.62, 7304.39.00.68, 7304.39.00.72, 7304.39.00.76, 7304.39.00.80, 7304.59.60.00, 7304.59.80.15, 7304.59.80.20, 7304.59.80.25, 7304.59.80.30, 7304.59.80.35, 7304.59.80.40, 7304.59.80.45, 7304.59.80.50, 7304.59.80.55, 7304.59.80.60, 7304.59.80.65, 7304.59.80.70, 7304.59.80.80, 7305.31.40.00, 7305.31.60.90, 7306.30.50.55, 7306.30.50.90, 7306.50.50.50, and 7306.50.50.70.

**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. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of OCTG and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

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

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

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 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-1b. **TAA information release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, contact person's title, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

☐ Yes

☐ No

- I-2a. **Establishments covered.**--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

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

Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
<sup>1</sup> Additional discussion on establishments consolidated in this questionnaire: _____.			

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

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

Law firm:	
Lead attorney(s):	

- I-3. **Petitioner status.**--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

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

I-4. **Petition support.**--Does your firm support or oppose the petition?

Country	Investigation type	Support	Oppose	Take no position
Argentina	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mexico	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Russia	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Russia	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-5. **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-6. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing OCTG from Argentina, Mexico, Russia, and/or South Korea into the United States or that are engaged in exporting OCTG from Argentina, Mexico, Russia, and/or South Korea to the United States?

☐ No      ☐ Yes--List the following information.

Firm name	Country	Affiliation

I-7. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of OCTG?

☐ No                      ☐ Yes--List the following information.

[illegible]

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

Further information on this part of the questionnaire can be obtained from Keysha Martinez (202-205-2136, [Keysha.Martinez@usitc.gov](mailto:Keysha.Martinez@usitc.gov)). **Supply all data requested on a calendar-year basis.**

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

Name	
Title	
Email	
Telephone	

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

<i>(check as many as appropriate)</i>		<i>(If checked, please describe the nature, date(s), and significance of any such reported changes as well as the business reasons for them; leave completely blank if not applicable)</i>
<input type="checkbox"/>	plant openings	
<input type="checkbox"/>	plant closings	
<input type="checkbox"/>	relocations	
<input type="checkbox"/>	expansions	
<input type="checkbox"/>	acquisitions	
<input type="checkbox"/>	consolidations	
<input type="checkbox"/>	prolonged shutdowns	
<input type="checkbox"/>	production curtailments	
<input type="checkbox"/>	revised labor agreements	
<input type="checkbox"/>	other (e.g., technology)	



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

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

II-3a. **Production using same machinery.**--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce OCTG, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

**"Overall production capacity" or "capacity"** – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-7. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-7 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

**"Production"** – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

Quantity (in short tons)					
Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>Overall production capacity<sup>1</sup></b>					
Seamless					
Welded					
All tubular capacity	0	0	0	0	0
<b>Production of:</b>					
Seamless OCTG <sup>2</sup>	0	0	0	0	0
Welded OCTG <sup>2</sup>	0	0	0	0	0
All OCTG	0	0	0	0	0
Other products <sup>3</sup>					
Total production using same machinery or workers	0	0	0	0	0
<sup>1</sup> Data reported for capacity (first and second lines) should be greater than data reported for total production (last line). <sup>2</sup> Data entered for production of seamless OCTG and welded OCTG production will populate here once reported in question II-7. <sup>3</sup> Please identify these products: _____.					

- II-3b. **Operating parameters.**--The production capacity reported in II-3a is based on the following operating parameters:

Hours per week	Weeks per year

- II-3c. **Capacity calculation.**--Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.

- II-3d. **Production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's production capacity. Please include your firm's heat-treating capacity for calendar year 2020.

- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between OCTG and other products using the same equipment and/or labor?

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) Please describe the factors that affect your firm's ability to shift production capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

- II-5. **Tolling**--Since January 1, 2018, has your firm been involved in a toll agreement regarding the production of OCTG? Please note that data concerning any toll production that you perform for other firms should be reported in Part V of this questionnaire.

**“Toll agreement”**--Agreement between two firms whereby the first firm (“tollee”) furnishes the raw materials and the second firm (“toller”) uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	If yes--Please describe the toll arrangement(s) and name the firm(s) involved.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-6. **Foreign trade zones**--

- (a) **Firm's FTZ operations**--Does your firm produce OCTG in and/or admit OCTG into a foreign trade zone (FTZ)?

**“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. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yes--Describe the nature of your firm's operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) **Other firms' FTZ operations**--To your knowledge, do any firms in the United States import OCTG into a foreign trade zone (FTZ) for use in distribution of OCTG and/or the production of downstream articles?

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

## **Mills' OCTG operations**

- II-7. **Mills' OCTG operations: Production, shipment, and inventory data.**--Report your firm's production capacity, production, shipments, and inventories related to **non-toll** production of OCTG in its U.S. establishment(s) during the specified periods. **Do not** report any toll production that your firm performs for other firms in this section (report these data in Part V of the questionnaire). Data reported in this question should include **any heat treatment operations your firm conducts on its own mill-produced OCTG.**

**"Average production capacity" or "capacity"** – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

**"Production"** – All production in your U.S. establishment(s), including production consumed internally within your firm.

**"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, inclusive of any third-party processing/tolling costs for heat treatment or finishing services.

**"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-7. **Mills' OCTG operations: Production, shipment, and inventory data.--Continued**

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>Average production capacity of:</b> <sup>1</sup>					
Seamless OCTG (quantity) (A)					
Welded OCTG (quantity) (B)					
All OCTG (quantity)	0	0	0	0	0
<b>Beginning-of-period inventories</b> (quantity) (C)					
<b>Production of:</b>					
Seamless OCTG (quantity) (D)					
Welded OCTG (quantity) (E)					
All OCTG (quantity)	0	0	0	0	0
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (F)					
Value (G)					
<b>Internal consumption:</b> <sup>2</sup>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Transfers to related firms:</b> <sup>2</sup>					
Quantity (J)					
Value <sup>2</sup> (K)					
<b>Export shipments:</b> <sup>3</sup>					
Quantity (L)					
Value (M)					
<b>End-of-period inventories</b> (quantity) (N)					

<sup>1</sup> The production capacity reported is based on operating \_\_\_\_\_ hours per week, \_\_\_\_\_ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity \_\_\_\_\_.

<sup>2</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.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>3</sup> Identify your firm's principal export markets: \_\_\_\_\_.

**RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.**--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 C), plus production (i.e., lines D and E), less total shipments (i.e., lines F, H, J, and L). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and, also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar year			January-June	
	2018	2019	2020	2020	2021
C + D + E – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

- II-8. **Mills' OCTG operations: Channels of distribution.**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

Quantity (in short tons)					
Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>U.S. shipments:</b>					
to Distributors (O)					
to Processors (P)					
to End users (Q)					

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines O, P, and Q) in each time period equal the quantity reported for U.S. shipments in question II-7 (i.e., lines F, H, and 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.

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

- II-9. **Mills' OCTG operations: U.S. shipments by type.**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) in 2020 by type.

Quantity (in short tons)	
Item	2020
<b>U.S. shipments of OCTG:</b>	
Seamless casing (R)	
Seamless tubing (S)	
Seamless coupling stock (T)	
Welded casing (U)	
Welded tubing (V)	

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.**--Please ensure that the quantities reported for U.S. shipments by type (i.e., lines R, S, T, U, and V) in 2020 equal the quantity reported for U.S. shipments in question II-7 (i.e., lines F, H, and J) in 2020. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year
	2020
$R + S + T + U + V - F - H - J = \text{zero ("0")}$ , if not revise.	0



- II-10. **Mills' OCTG operations: U.S. shipments by level of finishing.**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by level of finishing and by period.

**"Finished OCTG"**— Shipments of OCTG that are heat treated or are at their final grade at the time of shipment to your firm's customer, regardless of whether they are threaded or coupled.

**"Unfinished OCTG"**— Shipments of OCTG that are not heat treated (e.g., green tube) or are not at their final grade (i.e., upgradeable) at the time of shipment to your firm's customer.

Quantity (in short tons) and Value (in \$1,000)					
Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>U.S. shipments:</b>					
<b>Finished OCTG:</b>					
Quantity (W)					
Value (X)					
<b>Unfinished OCTG:</b>					
Quantity (Y)					
Value (Z)					

**RECONCILIATION OF U.S. SHIPMENTS BY LEVEL OF FINISHING.**--Please ensure that the quantities and values reported for U.S. shipments by level of finishing (i.e., lines W through Z) in each time period equal the quantity reported for U.S. shipments in question II-7 (i.e., lines F 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.

Reconciliation item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>Quantity:</b> $W + Y - F - H - J = \text{zero}$ ("0"), if not revise.	0	0	0	0	0
<b>Value:</b> $X + Z - G - I - K = \text{zero}$ ("0"), if not revise.	0	0	0	0	0

- II-11. **Mills' OCTG operations: Employment data.**--Report your firm's employment-related data related to the production of OCTG and provide an explanation for any trends in these data.

**"Production and Related Workers" (PRWs)** includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to June periods, calculate similarly and divide by 6.

If your firm had the same number of PRWs in all calendar year and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3)."

**"Hours worked"** includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

**"Wages paid"** --Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
Average number of PRWs ( <i>number</i> )					
Hours worked by PRWs ( <i>1,000 hours</i> )					
Wages paid to PRWs ( <i>\$1,000</i> )					

Explanation of trends:

- II-12. **Mills' OCTG operations: Related firms.**--If your firm reported transfers to related firms in question II-7, 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), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

## **Processors' OCTG operations**

- II-13. **Processors' OCTG operations: Production, shipment, and inventory data.**--Report your firm's independent **non-toll heat treatment** capacity, **non-toll** production, shipments, and inventories related to the heat treatment operations of **purchased (imported or domestic) OCTG** in its U.S. establishment(s) during the specified periods. **Do not** report any toll production that your firm performs for other firms in this section (report data relating to toll production in Part V of the questionnaire). Do not report any heat treatment conducted on your own mills' OCTG products in this question, report those data in question II-7 above.

**"Average heat treatment operations capacity" or "capacity"** – The level of heat treatment operations that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

**"Production"** – All production in your U.S. establishment(s) related to the heat treatment operations of **purchased (imported or domestic) OCTG**, including production consumed internally within your firm.

**"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-13. **Processors' OCTG operations: Production, shipment, and inventory data.**--Continued

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>Purchases of unfinished OCTG heat treated by your firm:</b>					
Quantity (A)					
Value (B)					
<b>Average heat treatment operations capacity<sup>1</sup> (quantity) (C)</b>					
<b>Beginning-of-period inventories (quantity) (D)</b>					
<b>Production using purchased/imported unfinished OCTG from:</b>					
Domestic sources (quantity) (E)					
Subject sources (quantity) (F)					
Nonsubject sources (quantity) (G)					
Production: All sources (quantity)	0	0	0	0	0
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (H)					
Value (I)					
<b>Internal consumption:<sup>2</sup></b>					
Quantity (J)					
Value <sup>2</sup> (K)					
<b>Transfers to related firms:<sup>2</sup></b>					
Quantity (L)					
Value <sup>2</sup> (M)					
<b>Export shipments:<sup>3</sup></b>					
Quantity (N)					
Value (O)					
<b>End-of-period inventories (quantity) (P)</b>					

<sup>1</sup> The production capacity reported is based on operating \_\_\_\_\_ hours per week, \_\_\_\_\_ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity \_\_\_\_\_.

<sup>2</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.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>3</sup> Identify your firm's principal export markets: \_\_\_\_\_.

II-13. **Processors' OCTG operations: Production, shipment, and inventory data.**—Continued

**RECONCILIATION OF SHIPMENTS, HEAT TREATMENT OPERATIONS, AND INVENTORY.**—Generally, the data reported for the end-of-period inventories (i.e., line P) should be equal to the beginning-of-period inventories (i.e., line D), plus production using purchased/imported unfinished OCTG (i.e., lines E, F, and G), less total shipments (i.e., lines H, J, L, and N). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and, also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar year			January-June	
	2018	2019	2020	2020	2021
D + E + F + G – H – J – L – N – P = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-14. **Processors' OCTG operations: Channels of distribution.**—Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution and by period.

Quantity (in short tons)					
Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>U.S. shipments:</b>					
to Distributors (Q)					
to Processors (R)					
to End users (S)					

**RECONCILIATION OF CHANNELS.**—Please ensure that the quantities reported for channels of distribution (i.e., lines Q, R, and S) in each time period equal the quantity reported for U.S. shipments in question II-13 (i.e., lines H, J, and L) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2018	2019	2020	2020	2021
Q + R + S – H – J – L = zero ("0"), if not revise.	0	0	0	0	0

- II-15. **Processors' OCTG operations: Employment data.**--Report your firm's employment-related data related to the production of OCTG and provide an explanation for any trends in these data.

**"Production and Related Workers" (PRWs)** includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to June periods, calculate similarly and divide by 6.

If your firm had the same number of PRWs in all calendar year and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3)."

**"Hours worked"** includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

**"Wages paid"**—Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
Average number of PRWs ( <i>number</i> )					
Hours worked by PRWs ( <i>1,000 hours</i> )					
Wages paid to PRWs ( <i>\$1,000</i> )					

Explanation of trends:

- II-16. **Processors' OCTG operations: Related firms.**--If your firm reported transfers to related firms in question II-7, 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), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-17. **Purchases.**--Has your firm purchased unfinished or finished OCTG produced in the United States or in other countries since January 1, 2018? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

**"Purchase"** – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

**"Import"** –A transaction to buy from a foreign supplier where your firm is the importer of record.

No	Yes	If yes--Report such purchases in the table below and explain the reasons for your firms' purchases.
<input type="checkbox"/>	<input type="checkbox"/>	

*Note:* If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below.

(Quantity in short tons)					
Item	Calendar year			January-June	
	2018	2019	2020	2020	2021
<b>Purchases from U.S. importers<sup>1</sup> of OCTG from—</b>					
Argentina					
Mexico					
Russia					
South Korea					
All other sources					
<b>Purchases from domestic producers<sup>2</sup></b>					
<b>Purchases from other sources<sup>3</sup></b>					
<sup>1</sup> Please list the name of the importer(s) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier: _____. <sup>2</sup> Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. <sup>3</sup> Please list the name of the firm(s) from which your firm purchased this product: _____.					

II-18. **Imports.**--Since January 1, 2018, has your firm imported OCTG?

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	If yes-- <b><u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u></b>

- II-19. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

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**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Jennifer Brinckhaus (202-205-3188, jennifer.brinckhaus@usitc.gov).

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

Name	
Title	
Email	
Telephone	

- III-2. **Accounting system.**—Please provide the following information on your firm's financial accounting system.

- A. When does your firm's fiscal year end (month and day)? \_\_\_\_\_  
If your firm's fiscal year changed during the data-collection period, explain below:

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include OCTG:

2. Does your firm prepare profit/loss statements for OCTG:  
☐ Yes ☐ No
3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.  
☐ audited, ☐ unaudited, ☐ annual reports, ☐ 10Ks, ☐ 10 Qs,  
☐ monthly, ☐ quarterly, ☐ semi-annually, ☐ annually
4. Accounting basis: ☐ U.S. GAAP, ☐ IFRS, ☐ cash, ☐ tax, or ☐ other comprehensive basis of accounting (specify) \_\_\_\_\_

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes OCTG, as well as specific statements and worksheets) used to compile these data.*

- III-3. **Cost accounting system.**--Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

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

--

- III-5. **Product listing.**--Please list the products your firm produced in the facilities in which your firm produced OCTG and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
OCTG	%
	%
	%
	%
	%

- III-6. **Inputs from related suppliers.**--Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of OCTG from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

<b>Yes--Continue to question III-7</b>	<b>No—Skip to question III-9a.</b>
<input type="checkbox"/>	<input type="checkbox"/>

- III-7. **Inputs from related suppliers detailed.**--Please identify the inputs used in the production of OCTG that your firm purchases from related suppliers and that are reflected in question III-9a. For "Share of total COGS" please report this information by relevant input on the basis of your most recently completed fiscal year. For "Input valuation" please describe the basis, as recorded in your company's own accounting system, of the purchase cost from the related supplier; e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate fair market value.

Input	Related supplier	Share of total COGS
<b>Input valuation as recorded in the firm's accounting books and records</b>		

- III-8. **Inputs purchased from related suppliers.**--Please confirm that the inputs purchased from related suppliers, as identified in III-7, are reported in III-9a (financial results on OCTG) or III-9d (stand-alone heat-treating operations) in a manner consistent with your firm's accounting books and records.

<b>Yes</b>	<b>No</b>	<b>If no--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

III-9a. **Mill operations on OCTG.**--Report the revenue and related cost information requested below on the OCTG mill operations of your firm's U.S. establishment(s), inclusive of any heat treatment costs associated with OCTG that was produced by your firm.<sup>1</sup> If your firm heat treats OCTG that it does not produce, those operations should be reported in question III-9d. If your firm provided heat treatment services on a toll-basis, please fill out Part V of the questionnaire. Note that internal consumption and transfers to related firms must be valued at fair market value.

Quantity (in short tons) and value (in \$1,000)					
Item	Fiscal year			January-June	
	2018	2019	2020	2020	2021
<b>Net sales quantities:</b> <sup>2</sup>					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
<b>Net sales values:</b> <sup>2</sup>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
<b>Cost of goods sold (COGS):</b> <sup>3</sup>					
Steel sheet or coil <sup>4</sup>					
Steel billets <sup>4</sup>					
All other raw materials					
Total raw materials	0	0	0	0	0
Cost of tolling services <sup>5</sup>					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>Selling, general, and administrative expenses</b>					
<b>Operating income (loss)</b>	0	0	0	0	0
<b>Other expenses and income:</b>					
Interest expense					
All other expense and income items, net <sup>6</sup>					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0
<b>Depreciation/amortization included above</b>					

<sup>1</sup> Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

<sup>2</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.

<sup>3</sup> COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers.

<sup>4</sup> If your firm produced the steel sheet/coil or steel billets, please include any raw material costs associated with the production of these items within the relevant category.

<sup>5</sup> Costs of tolling services should include fees paid to the toll processors, and costs associated with moving product to the processing facility.

<sup>6</sup> Report as a positive number if the amount nets to an expense and a negative number if it nets to an income.

- III-9b. **Financial data reconciliation.**--The calculable line items from question III-9a (i.e., total net sales quantities and values, total COGS, gross profit (or loss), operating profit (or loss), and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?

		<b>If no</b> --If the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise. Also, check signs of the line item "All other expense and income items, net." If the net value of the all other items reported here is an expense/loss, it should be reported as a positive number. If the net value is an income/gain it should be reported as a negative value. If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.
<b>Yes</b>	<b>No</b>	
<input type="checkbox"/>	<input type="checkbox"/>	

- III-9c. **Mills' total net sales, by type.**—Please report your firm's total net sales, by type. Note: the total reported at question III-9a that are of welded vs. seamless OCTG.

Item	Fiscal year			January-June	
	2018	2019	2020	2020	2021
	<b>Quantity (in short tons); value (in \$1,000)</b>				
<b>Total net sales.—</b>					
<b>Welded OCTG:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>Seamless OCTG:</b>					
<i>Quantity</i>					
<i>Value</i>					

**RECONCILIATION OF TOTAL NET SALES BY TYPE.**--Please ensure that the quantities and values reported for total net sales, by type, in each time period equal the data reported for total net sales in table III-9a. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Fiscal year			January-June	
	2018	2019	2020	2020	2021
<b>Quantity:</b> Quantity of welded OCTG + quantity of seamless OCTG – total net sales quantity from question III-9a, = zero ("0").	0	0	0	0	0
<b>Value:</b> Value of welded OCTG + value of seamless OCTG – total net sales value from question III-9a, = zero ("0").	0	0	0	0	0

- III-9d. **Non-toll processing operations (heat treatment) on OCTG.**--Report the revenue and related cost information requested below on your firm's non-toll heat-treating operations for purchased and/or imported unfinished OCTG (i.e., unfinished OCTG *not* produced in your facilities).<sup>1</sup> Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. If your firm was involved in tolling operations (as the toller), please fill out Part V of the questionnaire.

Quantity (in short tons) and value (in \$1,000)					
Item	Fiscal year			January-June	
	2018	2019	2020	2020	2021
<b>Net sales quantities:</b> <sup>2</sup>					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
<b>Net sales values:</b> <sup>2</sup>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
<b>Cost of goods sold (COGS):</b> <sup>3</sup>					
Unfinished OCTG from <u>domestic</u> sources					
Unfinished OCTG from <u>subject</u> import sources					
Unfinished OCTG from <u>nonsubject</u> import sources					
All other raw material costs					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>Selling, general, and administrative expenses</b>					
<b>Operating income (loss)</b>	0	0	0	0	0
<b>Other expenses and income:</b>					
Interest expense					
All other expense and income items, net <sup>4</sup>					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0
<b>Depreciation/amortization included above</b>					
<sup>1</sup> Include only sales (whether <u>domestic</u> or <u>export</u> ) and costs related to your <u>U.S. manufacturing operations</u> . <sup>2</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire. <sup>3</sup> COGS (whether for domestic or export sales) should include <u>costs associated with CS, IC, and Transfers</u> . <sup>4</sup> If the total reported amount is net other expenses, report as a positive number. If the total reported amount is net other income, report as a negative number. Please check the calculated "Net income or (loss) before income taxes" to ensure proper reporting of these items.					

- III-10. **Nonrecurring items (charges and gains) included in the subject product financial results.**--For each annual and interim period for which financial results are reported in questions III-9a and III-9d, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a or III-9d line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (*in \$1,000*), as reflected in question III-9a or III-9d; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in questions III-9a and III-9d.

Item	Fiscal year			January-June	
	2018	2019	2020	2020	2021
	Value (\$1,000)				
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

**Nonrecurring item:** In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a or III-9d where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item (also indicate whether this is included in III-9a or III-9d)
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

- III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**--If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items are reported in question III-9a and/or III-9d.

--

III-12a. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of OCTG. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for OCTG in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a or III-9d.

**Note:** Total assets should reflect net assets (after any accumulated depreciation and allowances deducted) and should be allocated to the subject products if these assets are also related to other products.

Value (in \$1,000)			
Item	Fiscal year		
	2018	2019	2020
Total assets (net)			

III-12b. **Description of asset values.**—Please provide explanations if there are any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) in the above response.

--

III-13a. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses for OCTG.

Value (in \$1,000)					
Item	Fiscal year			January-June	
	2018	2019	2020	2020	2021
Capital expenditures					
Research and development expenses					

III-13b. **Description of reported capital expenditures.**-- Please describe the nature, focus, and significance of your firm's reported capital expenditures. If no capital expenditure data were reported, please explain the reason.

--

III-13c. **Description of reported R&D expenses.**-- Please describe the nature, focus, and significance of your firm's reported R&D expenses.

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- III-14. **Data consistency and reconciliation.**—Please indicate whether your firm's financial data for questions III-9a, III-9d, III-12a, and III-13a are based on a calendar year or on your firm's fiscal year (Note - if your firm's fiscal year is on a calendar year basis, please check "calendar year"):

Calendar year	Fiscal year	Specify fiscal year
<input type="checkbox"/>	<input type="checkbox"/>	

**RECONCILIATION OF TRADE VS FINANCIAL DATA.**--Please ensure that the quantities and values reported for total shipments in Part II equal the quantities and values reported for total net sales in Part III of this questionnaire in each time period unless the financial data from Part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. If the calculated fields below return values other than "0" and both are being reported on a calendar-year basis, please explain below.

Reconciliation (II-7 and III-9a)	Fiscal year			January-June	
	2018	2019	2020	2020	2021
<b>Quantity:</b> Trade data from question II-7 (lines F, H, J, and L) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
<b>Value:</b> Trade data from question II-7 (lines G, I, K and M) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

Do the data in question III-9a reconcile with data in questions II-7?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

Reconciliation (II-13 and III-9d)	Fiscal year			January-June	
	2018	2019	2020	2020	2021
<b>Quantity:</b> Trade data from question II-13 (lines H, J, L, and N) less financial total net sales quantity data from question III-9d, = zero ("0").	0	0	0	0	0
<b>Value:</b> Trade data from question II-13 (lines I, K, M, and O) less financial total net sales value data from question III-9d, = zero ("0").	0	0	0	0	0

Do these data in question III-9d reconcile with data in question II-13?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

- III-15. **Effects of imports on investment.**--Since January 1, 2018, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of OCTG from Argentina, Mexico, Russia, and/or South Korea?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm has experienced actual negative effects as follows.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

- III-16. **Effects of imports on growth and development.**--Since January 1, 2018, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of OCTG from Argentina, Mexico, Russia, and/or South Korea?

<b>No</b>	<b>Yes</b>	
<input type="checkbox"/>	<input type="checkbox"/>	<b>If yes, my firm has experienced actual negative effects as follows.</b>

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

- III-17. **Anticipated effects of imports.**--Does your firm anticipate any negative effects due to imports of OCTG from Argentina, Mexico, Russia, and/or South Korea?

No	Yes	If yes, my firm anticipates negative effects as follows.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-18. **Effects on financial performance of COVID-19.**— Since January 1, 2020, has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus affected the financial performance of your firm's operations on OCTG as reported in III-9a and/or III-9d?

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

- III-19. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative 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 IV.--PRICING AND MARKET FACTORS**

Further information on this part of the questionnaire can be obtained from James Horne (202-205-2722, James.Horne@usitc.gov).

IV-1. **Contact information.**--Please identify the individual that Commission staff may contact regarding the confidential information submitted in Part IV.

Name	
Title	
Email	
Telephone	

**PRICE DATA**

IV-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 produced by your firm.

**Product 1.**-- Tubing, Grade L-80, 2 7/8" O.D., 6.5 lbs./ft., threaded and coupled, range 2, seamless sold to unrelated U.S. distributors.

**Product 2.**-- Tubing, Grade J-55, 2 3/8" O.D., 4.7 lbs./ft., threaded and coupled, range 2, welded sold to unrelated U.S. distributors.

**Product 3.**-- Casing, Grade P-110, 5 1/2" O.D., 20.0 lbs./ft., threaded and coupled, range 3, welded sold to unrelated U.S. distributors.

**Product 4.**-- Casing, Grade P-110, 5 1/2" O.D., 17.0 lbs./ft., threaded and coupled, range 3, seamless sold to unrelated U.S. distributors.

**Product 5.**-- Tubing, Grade L-80, 2 7/8" O.D., 6.5 lbs./ft., threaded and coupled, range 2, seamless sold to end users.

**Product 6.**-- Casing, Grade P-110, 5 1/2" O.D., 17.0 lbs./ft., threaded and coupled, range 3, seamless sold to end users.

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

IV-2a. During January 2018-June 2020, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following pricing data tables as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question IV-3.

IV-2b. **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm.

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

(Quantity in short tons, value in dollars)						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
<b>2018:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2019:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2020:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2021:</b>						
January-March						
April-June						

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

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

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

Product 1:

Product 2:

Product 3:

IV-2b. Price data.—*Continued*Report data in short tons and actual dollars (not 1,000s).

(Quantity in units, value in dollars)						
Period of shipment	Product 4		Product 5		Product 6	
	Quantity	Value	Quantity	Value	Quantity	Value
<b>2018:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2019:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2020:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2021:</b>						
January-March						
April-June						

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

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

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

Product 4:

Product 5:

Product 6:

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

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000) and short tons?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have discounts, rebates, and returns been credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Quantities do not exceed commercial shipments reported in part II in each year?	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

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

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



IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of OCTG (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

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

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

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

IV-5. **Pricing terms.**--On what basis are your firm's prices of domestic OCTG usually quoted (*check one*)?

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

IV-6. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced OCTG in 2020 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

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

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced OCTG (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

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

IV-8. **Lead times.**--What share of your firm's sales is 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 its U.S.-produced OCTG?

Source	Share of 2020 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

**IV-9. Shipping information.--**

- (a) Who generally arranges the transportation to your firm's customers' locations?  
☐ Your firm    ☐ Purchaser (*check one*)
- (b) Indicate the approximate percentage of your firm's sales of OCTG that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total</b> (should sum to 100.0%)	0.0 %

- IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced OCTG since January 1, 2018 (check all that apply)?

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

- IV-11. **Inland transportation costs.**—What is the approximate percentage of the cost of U.S.-produced OCTG that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent

IV-12. **End uses.**--List the end uses of the OCTG that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by OCTG and other inputs?

End-use product	Share of total cost of end use product accounted for by		Total (should sum to 100.0% across)
	OCTG	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-13. **Substitutes.**--Can other products be substituted for OCTG?

☐ 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 OCTG?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

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

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

IV-15. **Impact of the section 232 tariffs.**-- Did the imposition of tariffs on imported steel/aluminum products under section 232 have an impact on the OCTG market in the United States?

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

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how the imposition of tariffs under section 232 affected each factor of the OCTG market in the United States.
Supply of U.S.-produced OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of imported OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall U.S. demand for OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for seamless OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for welded OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-16. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of OCTG since January 1, 2018?

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

**IV-17. Conditions of competition.--**

- (a) Is the OCTG market subject to business cycles and/or other conditions of competition distinctive to OCTG? If yes, describe.

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

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

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

- IV-18. Supply constraints.--**Has your firm refused, declined, or been unable to supply OCTG at any time between January 1, 2018 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

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

IV-19. **Raw materials.**--How have OCTG raw material prices changed since January 1, 2018?

Item	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 OCTG.
Raw materials for seamless OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw materials for welded OCTG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-20. **Interchangeability.**--Is OCTG 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

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

Country-pair	Argentina	Mexico	Russia	South Korea	Other countries
United States					
Argentina					
Mexico					
Russia					
South Korea					
For any country-pair producing OCTG that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:					

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

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	Argentina	Mexico	Russia	South Korea	Other countries
United States					
Argentina					
Mexico					
Russia					
South Korea					
For any country-pair for which factors other than price are <i>always</i> or <i>frequently</i> a significant factor in your firm's sales of OCTG, identify the country-pair and relevant factors and report the advantages or disadvantages imparted by such factors:					



IV-22. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for OCTG since January 1, 2018. Indicate the share of the quantity of your firm's U.S. shipments of OCTG 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							

**IV-23. Competition from imports.--**

- (a) **Lost revenue.**--Since January 1, 2018: To avoid losing sales to competitors selling OCTG from Argentina, Mexico, Russia, and/or South Korea, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

- (b) **Lost sales.**--Since January 1, 2018: Did your firm lose sales of OCTG to imports of this product from Argentina, Mexico, Russia, and/or South Korea?

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

- (c) **The submission of lost sales/lost revenue allegations is to be completed only by NON-PETITIONERS.**

If your firm indicated "yes" to any of the above, your firm can provide the Commission with additional information by downloading and completing the lost sales/lost revenues worksheet at [http://usitc.gov/trade\\_remedy/question.htm](http://usitc.gov/trade_remedy/question.htm). Note that the Commission may contact the firms named to verify the allegations reported.

Is your firm submitting the lost sales/lost revenues worksheet?

<input type="checkbox"/>	No—Please explain.
<input type="checkbox"/>	Yes—Please complete the worksheet and submit via the Commission dropbox. <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> . (PIN: <b>OCTG</b> )

- IV-24. Other explanations.**--If your firm would like to further explain a response to a question in Part IV 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 V.--PRODUCT AND INDUSTRY CONSIDERATIONS**

Further information on this part of the questionnaire can be obtained from Keysha Martinez (202-205-2136, [Keysha.Martinez@usitc.gov](mailto:Keysha.Martinez@usitc.gov)).

**Note:** All three categories of firms conducting production-related activities in the United States should complete this section of the questionnaire:

- Mills: That are reporting trade and financial data in parts II and III.
- Independent processors: That are reporting trade and financial data in parts II and III.
- Toll processors: That are reporting trade and financial data in part VI.

V-1. **Semi-finished product analysis.**--Please answer the following questions regarding the differences and similarities in unfinished OCTG and finished OCTG in this proceeding as defined below:

**"Finished OCTG"**— Shipments of OCTG that are heat treated or are at their final grade at the time of shipment to your firm's customer, regardless of whether they are threaded or coupled.

**"Unfinished OCTG"** – Shipments of OCTG that are not heat treated (e.g., green tube) or are not at their final grade (i.e., upgradeable) at the time of shipment to your firm's customer, regardless of whether they are threaded or coupled.

**(a) Are there uses for unfinished OCTG other than for the production of finished OCTG?**

No	Yes	If yes--Please describe these uses.
<input type="checkbox"/>	<input type="checkbox"/>	

**(b) Is the market for unfinished OCTG separate and distinct from the market for finished OCTG?**

No	Yes	If yes--Please describe how they are separate and distinct.
<input type="checkbox"/>	<input type="checkbox"/>	

V-1. **Semi-finished product analysis.**—*Continued*

- (c) Are there differences in the physical characteristics and functions of unfinished OCTG and finished OCTG?

No	Yes	If yes--Please describe these differences.
<input type="checkbox"/>	<input type="checkbox"/>	

- (d) Is there a significant difference in the cost or value between unfinished OCTG and finished OCTG?

No	Yes	If yes--Please describe these differences.
<input type="checkbox"/>	<input type="checkbox"/>	

- (e) Would you describe the processes used to transform the unfinished OCTG into the finished OCTG as significant and particularly labor or capital intensive?

No	Yes	If yes--Please describe the labor or capital intensively of the conversion process.
<input type="checkbox"/>	<input type="checkbox"/>	

- V-2. **Detailed explanation of firm's domestic activities.**--Please describe in detail your firm's operations with respect to producing or processing OCTG in the United States.

--

- V-3 **Production operations.**--Since January 1, 2018, has your firm either produced (on a mills) or processed (i.e., heat treated) OCTG in the United States either?

No	Yes	If yes—Please describe the nature and extent of the following items in relation to your firm's production or processing operations <u>in the United States</u> .
<input type="checkbox"/>	<input type="checkbox"/>	

Capital investments	
Technical expertise	
Value added	
Employment	
Quantity, type and source of parts	
Costs and activities	

V-4. **Operations' complexity and importance.**--On a scale of 1 to 5, please provide your firm's subjective opinion as to the complexity, intensity, and importance of your firm's production-related activities. 1 being minimally complex, intense or important; 5 being extremely complex, intense, and important.

<b>1:</b> <b>Minimally complex, intense, and important</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5:</b> <b>Extremely complex, intense, and important</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Please describe the reason for your rating below.</b>				

**PART VI.--TOLL PRODUCTION**

Further information on this part of the questionnaire can be obtained from Keysha Martinez (202-205-2136, [Keysha.Martinez@usitc.gov](mailto:Keysha.Martinez@usitc.gov)).

VI-1. **Toll processors: toll production of OCTG.**--For the tolling operations of your U.S. establishment(s), report the information requested below. Supply all data requested on a calendar-year basis.

<b>Quantity (in short tons) and value (in \$1,000)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-June</b>	
	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2020</b>	<b>2021</b>
<b>Average production capacity</b> (quantity) (A)					
<b>Production</b> (quantity) (B)					
<b>Shipments:</b> <sup>1 2</sup>					
For the account of <b>U.S. mills</b> <sup>3</sup> (quantity) (C)					
(value) (D)					
For the account of <b>U.S. importers</b> <sup>4</sup> (quantity) (E)					
(value) (F)					
For the account of <b>other customers</b> <sup>5</sup> (quantity) (G)					
(value) (H)					
<b>Average number of PRWs</b>					
<b>Hours worked by PRWs</b> (1,000 hours)					
<b>Wages paid to PRWs</b> (value)					
<sup>1</sup> Report your firm's shipments of OCTG which it converted under a toll agreement with another firm. Quantity refers to the amount of OCTG converted, and value refers to your firm's fee for its services. <sup>2</sup> Less discounts, returns, allowances, and prepaid freight. <sup>3</sup> Please identify the U.S. mills for whom your firm provided these tolling services: _____. <sup>4</sup> Please identify the U.S. importers for whom your firm provided these tolling services: _____. <sup>5</sup> Please identify the other customers for whom your firm provided these tolling services: _____.					

VI-2. **Operating parameters and capacity.**--Report the bases used for reporting your firm's OCTG operating parameters and capacity in question VI-1.

(a) **Operating parameters.**--The production capacity (see definitions in instruction booklet) reported above is based on operating \_\_\_\_\_ hours per week, \_\_\_\_\_ weeks per year.

(b) **Capacity calculation.**--Please describe the methodology used to calculate production capacity reported above, and explain any changes in reported capacity.

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(c) **Same equipment, machinery, and workers.** If your firm reported production of products other than OCTG on the same equipment and machinery used in the production of OCTG and/or using the same production and related workers employed to produce OCTG, please indicate the basis for allocation of capacity and employment data (indicate if different).

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VI-3. **Accounting system.**—Please provide the following information.

A. When does your firm's fiscal year end (month and day)? \_\_\_\_\_

If your firm's fiscal year changed during the data-collection period, explain below:

\_\_\_\_\_

B. Accounting basis used by your firm: ☐ U.S. GAAP, ☐ IFRS, ☐ cash, ☐ tax, or ☐ other comprehensive basis of accounting (specify) \_\_\_\_\_

VI-4a. **TOLLING operations.**--Report the revenue and related cost information requested below on the OCTG tolling operations of your firm's U.S. establishment(s).<sup>1</sup> **Report operations for all tollees combined.**

Quantity ( <i>in short tons</i> ) and value ( <i>in \$1,000</i> )					
Item	Fiscal year			January-June	
	2018	2019	2020	2020	2021
<b>Net quantity tolled</b>					
<b>Net tolling revenue</b>					
<b>Cost of tolling services</b>					
Raw materials not supplied by tollee					
Direct labor					
Other factory costs					
Total cost of tolling services	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>General and administrative expenses</b>					
<b>Operating income (loss)</b>	0	0	0	0	0
<sup>1</sup> Include only tolling revenue (whether domestic or exports) and costs related to your <u>U.S. processing operations</u> .					

*Note -- The table above contains calculations that will appear when you have entered data in the MS Word form fields.*

VI-4b. **RECONCILIATION OF TRADE VS FINANCIAL DATA.**--Please ensure that the quantities and values reported for total shipments in question VI-1 equal the net quantity tolled and net tolling revenue, respectively, in question VI-4a for each time period unless the financial data in VI-4a are reported on a fiscal year basis, in which case only the partial year periods should reconcile. If the calculated fields for the annual-year periods return values other than zero (i.e., "0") and the financial data are reported on a calendar-year basis, or if the partial year periods return values other than zero, regardless of the reporting basis, please explain the discrepancy below.

Reconciliation (Question VI-1 and VI-4a)	Fiscal year			January-June	
	2018	2019	2020	2020	2021
<b>Quantity:</b> Shipment data from question VI-1 (lines C, E, and G) less net quantity tolled from question VI-4a, = zero ("0").	0	0	0	0	0
<b>Value:</b> Shipment data from question VI-1 (lines D, F, and H) less net tolling revenue from question VI-4a, = zero ("0").	0	0	0	0	0

Do the data in question VI-4a reconcile with data in question VI-1?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

- VI-5a. **Asset values.**-- Report the total assets (i.e., both current and long-term assets) associated with your firm's tolling operations for OCTG. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for OCTG in the normal course of business, please estimate this information based upon an allocation method (such as production, sales, or costs) that is consistent with any allocations used in VI-3a.

**Note:** Total assets should reflect net assets (after any accumulated depreciation and allowances deducted).

Value (in \$1,000)			
Item	Fiscal year		
	2018	2019	2020
Total assets (net)			

- VI-5b. **Description of asset values.**—Please provide explanations if there are any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) in the above response.

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- VI-6a. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses for OCTG.

Value (in \$1,000)					
Item	Fiscal year			January-June	
	2018	2019	2020	2020	2021
Capital expenditures					
Research and development expenses					

- VI-6b. **Description of reported capital expenditures.**-- Please describe the nature, focus, and significance of your firm's reported capital expenditures. If no capital expenditure data were reported, please explain the reason.

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- VI-6c. **Description of reported R&D expenses.**-- Please describe the nature, focus, and significance of your firm's reported R&D expenses.

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## 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/oil\\_country\\_tubular\\_goods\\_octg\\_argentina\\_mexico/preliminary.htm](https://www.usitc.gov/investigations/701731/2021/oil_country_tubular_goods_octg_argentina_mexico/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.

- **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:** OCTG

- **E-mail.**—E-mail the MS Word questionnaire to [Keysha.Martinez@usitc.gov](mailto:Keysha.Martinez@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 produce this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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