

## U.S. PRODUCERS' QUESTIONNAIRE

### RAW HONEY FROM ARGENTINA, BRAZIL, INDIA, UKRAINE, AND VIETNAM

This questionnaire must be received by the Commission by **February 1, 2022**  
*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 antidumping investigations concerning raw honey from Argentina, Brazil, India, Ukraine, and Vietnam (Inv. Nos. 731-TA-1560-1564 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

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

Address \_\_\_\_\_

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

Website \_\_\_\_\_

Has your firm produced raw honey (as defined on next page) 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 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: **RAW**)

#### 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 a petition filed on April 21, 2021, by the American Honey Producers Association (“AHPA”), Bruce, South Dakota, and the Sioux Honey Association (“SHA”), Sioux City, Iowa. 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 dumping. Questionnaires and other information pertinent to this proceeding are available at [https://www.usitc.gov/investigations/701731/2021/raw\\_honey\\_argentina\\_brazil\\_india\\_ukraine\\_and/final.htm](https://www.usitc.gov/investigations/701731/2021/raw_honey_argentina_brazil_india_ukraine_and/final.htm).

**Raw honey** covered by these investigations is honey as it exists in the beehive or as obtained by extraction, settling and skimming, or coarse straining. Raw honey has not been filtered to a level that results in the removal of most or all of the pollen, e.g., a level that removes pollen to below 25 microns. The subject products include all grades, floral sources and colors of raw honey and also include organic raw honey.

Excluded from the scope is any honey that is packaged for retail sale (e.g., in bottles or other retail containers of five (5) lbs. or less).

Raw honey is currently imported under statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065 of the Harmonized Tariff Schedule of the United States (“HTSUS”). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

**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.

**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-1. **Special instruction.** —Has your firm produced raw honey using fewer than 3,800 colonies in the United States in each period since 2018 (i.e., never exceeded 3,800 colonies in any given year)?

Response	Description	Sections (see note below)
<input type="checkbox"/>	Yes, our firm produced raw honey using fewer than 3,800 colonies in the United States each year since 2018. (i.e., the colonies our firm used never exceeded 3,800 in any given year).	I, II, and VI
<input type="checkbox"/>	No, our firm produced raw honey using 3,800 colonies or more in the United States in at least one year since 2018 (i.e., the colonies our firm harvested equaled or exceeded 3,800 in either 2018, 2019, 2020, or 2021 or any combination thereof).	I, III, IV, V, and VI

**Fewer than 3,800 colonies in each year.** —If your firm produced raw honey using fewer than 3,800 colonies in the United States annually since 2018, completion of Parts I, II, and VI will be considered as a sufficient response to this questionnaire. (Beekeeping firms that qualify to fill out part II instead of parts III and IV, may choose nonetheless to fill out the more detailed parts III and IV in lieu of part II. However, firms should not fill out both part II and the more detailed parts III and IV.)

**3,800 colonies or more in at least one year.** —Beekeeping firms that produced raw honey using 3,800 colonies or more in the United States annually in at least one year since 2018 should fill out all parts of the questionnaire **except** part II.

**Questionnaire Response Guide**

Section of this questionnaire	Fewer than 3,800 colonies in each year	3,800 colonies or more in at least one year
Part I - General	✓	✓
Part II - Select trade and financial information (abbreviated)	✓	✗
Part III - Trade and related information	✗	✓
Part IV - Financial information	✗	✓
Part V - Pricing and market factors	✗	✓
Part VI- Alternate product information	✓	✓

- I-2. **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-2b. **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-3a. **Honey-production locations covered.** —Provide the city, state, zip code, and brief description of each honey-production location covered by this questionnaire. **Firms operating more than one honey-production location should combine the data for all honey-production locations into a single report.**

***"Honey-production location"***—Each apiary or field location involved in the production of raw honey, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such apiary or field locations.

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

- I-3b. **Colony/hive locations throughout the year.** — Please indicate the location or locations of your firm's honey-production assets (i.e., hives/colonies) during the course of a typical year.

Month	State(s)	Honey-production assets (i.e., hives/colonies) engaged in		
		Raw honey production	Commercial pollination	Other
January		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
February		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
March		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
April		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
May		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
June		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
July		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
August		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
September		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
October		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
November		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
December		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-3c. **Stock symbol information.** — If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: \_\_\_\_\_.

- I-3d. **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-4. **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-5. **Petition support.** — Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
Argentina	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brazil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ukraine	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

[illegible]

I-9. **Cooperative membership.** —Is your firm a member of a cooperative(s)?

<b>No</b>	<b>Yes</b>	<b>If yes</b> —please provide the information requested below.
<input type="checkbox"/>	<input type="checkbox"/>	

Cooperative name	Primary cooperative contact person	Share of your firm's shipments of raw honey that were sold through this cooperative

Describe the volume and timing of your firm's cooperative shipments (e.g., indicate whether the cooperative requires your company to ship all of its raw honey to the cooperative or if your firm is also allowed to sell raw honey in the open market).	
What is the average length of time between when your company ships the raw honey to the cooperative and when payment is received?	



**PART II. — SELECTED TRADE AND RELATED INFORMATION**

**Note:** Part II should only be completed by firms that produced raw honey using less than 3,800 colonies in the United States annually since 2018. Further information on this part of the questionnaire can be obtained from Andres Andrade (202-205-2078, [Andres.Andrade@usitc.gov](mailto:Andres.Andrade@usitc.gov)) and Jennifer Brinckhaus (202-205-3188, [jennifer.brinckhaus@usitc.gov](mailto:jennifer.brinckhaus@usitc.gov)).

**Definitions**

**“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.

**“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.

**“Shipments to cooperative”** – U.S. shipments made to a cooperative or “co-op” organization that processes, packs, and/or markets honey on behalf of its owners (i.e., your own firm and other beekeepers).

**“Internal consumption”** – Product consumed internally by your firm. Such transactions are valued at fair market value. Do not include shipments made to a cooperative that processes raw honey as internal consumption, rather internal consumption should be limited to raw honey that your firm itself either processes or filters into out-of-scope processed or filtered honey, or packages without processing or filtering raw honey into five pound or smaller packages.

**“Transfers to related firms”** – Shipments made to related firms. Such transactions are valued at fair market value. Do not include shipments made to a cooperative that processes raw honey as transfers to related firms, rather transfers to related firms should be limited to sales made to related firms other than a cooperative that your firm is a partial owner of.

**“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.

**“Worker”** – includes compensated and non-compensated workers, as defined below.

**“Hours worked”** includes all compensated and non-compensated hours worked as well as 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.

- II-1. **Trade and employment information.** — Report your firm's average number of honey-producing colonies, production, U.S. shipments, and employment data related to your firm's production of raw honey in the United States during the specified periods.

Quantity ( <i>in pounds</i> ) and value ( <i>in dollars</i> )			
Item	Calendar year		
	2018	2019	2020
<b>Trade</b>			
Average number of honey-producing colonies: <sup>1</sup> ( <i>number</i> )			
Production ( <i>quantity</i> )			
U.S. shipments: <sup>2</sup>			
<i>Quantity</i>			
<i>Value</i>			
End-of-period inventories ( <i>quantity</i> )			
<b>Employment<sup>3</sup></b>			
Average number of workers (Number)			
Hours worked by workers (1,000 hours)			
<p><sup>1</sup> Please report the average amount of honey can be expected to be produced from a single colony in a year given ideal weather conditions in pounds ____.</p> <p><sup>2</sup> Inclusive of U.S. commercial shipments (including shipments to a cooperative), internal consumption, and transfers to related firms. 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, <i>etc.</i>): ____.</p> <p>However, the data provided above in this table should be based on fair market value.</p> <p><sup>3</sup> Please include data for all workers at your firm involved in the production of raw honey regardless of whether these workers were on a formal payroll system (i.e., include data for family members who worked to help produce raw honey).</p>			

- II-2. **Financial operations on all beekeeping activities.** — Report the revenue and related cost information requested below related to your firm's beekeeping activities in the United States during the specified periods.

Quantity (in pounds) and value (in dollars)			
Item	Calendar year <sup>1</sup>		
	2018	2019	2020
<b>Net sales quantities:</b> Sales of raw honey <sup>2</sup>			
<b>Net sales values:</b> Sales of raw honey <sup>2</sup>			
Commercial pollination fees			
Sales of other beekeeping-related products (e.g., beeswax, package bees, nucs, etc.)			
<b>Operating expenses for all beekeeping activities</b>			
<b>Operating income/(loss) for all beekeeping activities</b>	0	0	0
<b>All other (i.e., non-operating) expenses</b> (specify below <sup>3</sup> )			
<b>Other income:</b> Insurance proceeds or other government program income (specify below <sup>4</sup> )			
All other income (specify below <sup>5</sup> )			
<b>Net income/(loss) for all beekeeping activities</b>	0	0	0

<sup>1</sup> Report all revenue and cost information on a calendar year basis. If your firm's fiscal year does not end on December 31, please report when your firm's fiscal year ends (month and day): \_\_\_\_\_.

<sup>2</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in question II-1.

<sup>3</sup> Describe what expenses have been included in "All other (non-operating) expenses":

<sup>4</sup> Specify the source(s) of the insurance proceeds or other government program income:

<sup>5</sup> Specify the source(s) of the "all other income":

- II-3. **Operations on sales of raw honey that is packaged for retail sale (i.e., in containers of 5 lb. or less).** — Please report the volume of your company's sales of raw honey that is packaged for retail sale.

Raw honey packaged for retail sale	Calendar year		
	2018	2019	2020
	Quantity (in pounds)		
Net sales volume			

**PART III. — TRADE AND RELATED INFORMATION**

**Note:** Completion of part III is only required for firms that produced raw honey using 3,800 colonies or more in the United States annually in 2018 or 2019 or 2020 or using 3,800 colonies or more in Jan.-Sept. 2021. Beekeepers that qualify to fill out part II instead of part III, may choose nonetheless to fill out the more detailed part III in lieu of part II. Firms, however, should not fill out both part II and the more detailed part III. Further information on this part of the questionnaire can be obtained from Andres Andrade (202-205-2078, [Andres.Andrade@usitc.gov](mailto:Andres.Andrade@usitc.gov)). **Supply all data requested on a calendar-year basis.**

- 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. **Nature of raw honey operations.** —Please indicate the nature of your firm's raw honey operations per the definitions below. Please select the option that applies.

"Beekeeper with no processing/ retail packaging operations" – Individual firm involved only in the owning and keeping of honeybees for the production of raw honey.

"Beekeeper with processing/ retail packaging operations"— Firm involved in owning and keeping honeybees for the production of raw honey that also has processing and/or retail packaging operations.

<b><i>Check the box that applies</i></b>	
<input type="checkbox"/>	Beekeeper with no processing/ packaging operations
<input type="checkbox"/>	Beekeeper with processing/ packaging operations
<input type="checkbox"/>	Other <sup>1</sup>
<sup>1</sup> Please describe: _____.	

III-3a. **Changes in operations.** —Please indicate whether your firm has experienced any of the following changes in relation to the production of raw honey 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"/>	Net expansion in number of colonies/ hives	
<input type="checkbox"/>	Net reduction in number of colonies/ hives/ colony collapse disorder	
<input type="checkbox"/>	Began extraction/ separation/ settling/ containerizing operations	
<input type="checkbox"/>	Ceased extraction/ separation/ settling/ containerizing operations	
<input type="checkbox"/>	Weather related events	
<input type="checkbox"/>	Disease or pest-related events	
<input type="checkbox"/>	Changes in labor availability or costs including challenges related to the H2-A visa program	
<input type="checkbox"/>	Other (e.g., technology)	

- III-3b. **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 raw honey? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations.

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"/>	

- III-3c. **Colony loss.** — Since January 1, 2018, has your firm experienced colony loss for any reason (varroa mites, colony collapse disorder, weather, etc.)?

No	Yes	If yes, please indicate (a) the specific causes of bee losses (if known), (b) the average share of your firm's colonies that were lost annually and how the loss rate has changed over time, and (c) the impact colony loss has had on your firm's operations.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-4. **Product shifting.** —

- (a) Is your firm able to switch production (capacity) between raw honey 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.

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**Definitions**

**“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.

**“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.

**“Shipments to cooperative”** – U.S. shipments made to a cooperative or “co-op” organization that processes, packs, and/or markets honey on behalf of its owners (i.e., your own firm and other beekeepers).

**“Internal consumption”** – Product consumed internally by your firm. Such transactions are valued at fair market value. Do not include shipments made to a cooperative that processes raw honey as internal consumption, rather internal consumption should be limited to raw honey that your firm itself either processes or filters into out-of-scope processed or filtered honey, or packages without processing or filtering raw honey into five pound or smaller packages.

**“Raw honey in retail packaging”** - Raw honey that is packaged for retail sale (e.g., in bottles or other retail containers of five (5) lbs. or less for roadside sales, gifts, etc.).

**“Transfers to related firms”** –Shipments made to related firms. Such transactions are valued at fair market value. Do not include shipments made to a cooperative that processes raw honey as transfers to related firms, rather transfers to related firms should be limited to sales made to related firms other than a cooperative that your firm is a partial owner of.

**“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.

**“Calendar year 2020” and “January-September 2020”**— In the subsequent grids, your firm should enter data into both columns if you have operations that occurred between January and September 2020. The first column for “Calendar year 2020” should include operations for all twelve months of 2020, while the column January-September 2020 should only include operations for the first nine months of 2020. Data for the first nine months of 2020 are intended to be comparable to the data for January to September 2021.

*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.*

III-5. **Production, shipment, and inventory data.**

<b>Quantity (in pounds) and value (in dollars)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-September</b>	
	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2020</b>	<b>2021</b>
<b>Average number of honey-producing colonies:</b> <sup>1</sup> (number) (A)					
<b>Beginning-of-period inventories</b> (quantity) (B)					
<b>Production</b> (quantity) (C)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
<b>To cooperatives:</b>					
Quantity (D)					
Value (E)					
<b>All other commercial shipments:</b>					
Quantity (F)					
Value (G)					
<b>Internal consumption:</b> <sup>2</sup>					
<b>Raw honey in retail packaging:</b> <sup>3</sup>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>All other internal consumption:</b> <sup>4</sup>					
Quantity (J)					
Value <sup>2</sup> (K)					
<b>Transfers to related firms:</b> <sup>5</sup>					
Quantity (L)					
Value (M)					
<b>Export shipments:</b> <sup>6</sup>					
Quantity (N)					
Value (O)					
<b>End-of-period inventories</b> (quantity) (P)					

<sup>1</sup> Please report the average amount of honey can be expected to be produced from a single colony in a year given ideal weather conditions in pounds \_\_\_\_.

<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> Unprocessed or minimally processed honey put into containers of five (5) pounds or less for which there was insufficient processing to filter out pollen to below 25 microns (e.g., sold as roadside sales or gifts).

<sup>4</sup> This could be honey that was processed sufficiently to remove it from the definition of raw honey (on page 2), i.e., honey for which there was sufficient processing to filter out pollen to below 25 microns, or honey that was used in the production of downstream non-honey food products (e.g., used in cooking or baking activities).

<sup>5</sup> Do not report shipments to cooperatives in this category, rather shipments sold via a cooperative should be reported as “commercial shipments to cooperatives” (lines D and E above).

<sup>6</sup> Identify your firm’s principal export markets: \_\_\_\_\_.



III-5. **Production, shipment, and inventory data.** —continued.

**RECONCILIATION OF SHIPMENTS, PRODUCTION, 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 B), plus production (i.e., line C), less total shipments (i.e., lines D, F, 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-September	
	2018	2019	2020	2020	2021
B + C – D – F – 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: _____.					

- III-6. **U.S. shipments by raw honey type.** — Report your firm's U.S. shipments of raw honey (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by raw honey type.

Quantity ( <i>in pounds</i> ) and value ( <i>in dollars</i> )					
Item	Calendar year			January-September	
	2018	2019	2020	2020	2021
<b>U.S. shipments:</b>					
<b>Organic:</b>					
White or lighter: Quantity (Q)					
Value (R)					
Extra light amber: Quantity (S)					
Value (T)					
Light amber: Quantity (U)					
Value (V)					
Amber or darker: Quantity (W)					
Value (X)					
<b>Conventional:</b>					
White or lighter: Quantity (Y)					
Value (Z)					
Extra light amber: Quantity (AA)					
Value (AB)					
Light amber: Quantity (AC)					
Value (AD)					
Amber or darker: Quantity (AE)					
Value (AF)					

III-6. **U.S. shipments by raw honey type.** —continued.

**RECONCILIATION OF U.S. SHIPMENTS BY RAW HONEY TYPE.** — Please ensure that the quantities and values reported for U.S. shipments by raw honey type (i.e., lines Q through AF) in each time period equal the quantities and values reported for total U.S. shipments reported in III-5 (i.e., lines D through M) 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-September	
	2018	2019	2020	2020	2021
Quantities: $Q + S + U + W + Y + AA + AC + AE - D - F - H - J - L = \text{zero ("0")}$ , if not revise.	0	0	0	0	0
Values: $R + T + V + X + Z + AB + AD + AF - E - G - I - K - M = \text{zero ("0")}$ , if not revise.	0	0	0	0	0

III-7. **Seasonal nature of shipments of raw honey.** —Do your firm's production and shipments of raw honey typically follow a seasonal pattern? If yes, please describe the seasonal nature of your firm's production and shipment of raw honey.

No	Yes	If yes, please describe the typical seasonal nature of your firm's raw honey production and shipments and indicate your firm's raw honey peak production period (i.e., which months).
<input type="checkbox"/>	<input type="checkbox"/>	

- III-8. **Employment data.** — Report your firm's employment-related data related to the production of raw honey and provide any explanation for any trends in these data.

**"Worker"** — includes compensated and non-compensated workers, as defined below.

**Compensated worker:** Anyone who was paid for work done on an apiary in connection with the production of raw honey. This includes field workers (employees engaged in tending to bees and extracting raw honey including operation of machinery); supervisors; other workers employed by your firm (e.g., bookkeepers); and contract labor.

**Non-compensated worker:** Self-employed and family apiary members.

**"Hours worked"** includes all compensated and non-compensated hours worked as well as 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. Include payments made by your firm for contract labor.

Item	Compensated workers				
	Calendar year			January-September	
	2018	2020	2020	2020	2021
Number of compensated workers <sup>1</sup> ( <i>number</i> )					
Hours worked by compensated workers ( <i>hours</i> )					
Wages paid to compensated workers ( <i>dollars</i> )					
<sup>1</sup> Record your firm's peak number of compensated workers, that is, the maximum number of compensated workers your firm had at any given time within the specified period.					

Item	Non-compensated workers				
	Calendar year			January-September	
	2018	2019	2020	2020	2021
Number of non-compensated workers <sup>1</sup> ( <i>number</i> )					
Hours worked by non-compensated workers ( <i>hours</i> )					
<sup>1</sup> Record your firm's peak number of non-compensated workers, that is, the maximum number of non-compensated workers your firm had at any given time within the specified period.					

Explanation of trends:

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- III-9. **Related firms.** — If your firm reported transfers to related firms in question III-5, 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.

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- III-10. **Purchases.** — Has your firm purchased raw honey 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 pounds)					
Item	Calendar year			January-September	
	2018	2019	2020	2020	2021
<b>Purchases from U.S. importers<sup>1</sup> of raw honey from—</b>					
Argentina					
Brazil					
India					
Ukraine					
Vietnam					
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: _____.					

III-11. **Imports.** —Since January 1, 2018, has your firm imported raw honey?

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

If yes—**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

III-12. **Captive production use.** —Please report your firm's internal consumption and transfers to related firms for the uses identified below. These data should reconcile with the quantities reported in question III-5 (lines H, J, and L).

<b>Quantity (in pounds)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-September</b>	
	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2020</b>	<b>2021</b>
<b>Internal consumption and transfers to related firms. —</b>					
Subsequently sold as is, i.e., as raw honey, (merchandise was diverted back into the market for raw honey)					
Subsequently packaged into retail level packaging (i.e., into a downstream product)					
Subsequently processed (i.e., into a downstream product)					

**RECONCILIATION OF CAPTIVE PRODUCTION USE.** — The sum of the data reported above should be equal to the sum of the data reported in lines H, J, and L of question III-5 for all periods.

<b>Reconciliation</b>	<b>Calendar year</b>			<b>January-September</b>	
	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2020</b>	<b>2021</b>
Internal consumption and transfers to related firms (lines H, J, and L in III-5) reconciliation.	0	0	0	0	0

Note. —Please work to the best of your ability with any related firm(s) to provide estimates for these data if your firm reported “transfers to related firms”.

- III-13. **Raw honey share of inputs into processed/ retail honey.**—If your firm reported that your firm's raw honey was used in the production of processed or retail honey as reported in question III-12, please provide the following data on the share that raw honey and other inputs account for the production of processed retail honey.

Material inputs used in processed retail honey production	Share of <i>value</i> accounted for in processed / retail honey ( <i>percent</i> )	Share of the <i>weight</i> accounted for in processed / retail honey ( <i>percent</i> )
Raw honey		
All other material inputs <sup>1</sup>		
<b>Total</b> (should sum to 100.0%)	0.0	0.0
<sup>1</sup> This should include other material inputs such as packaging or retail container materials, but should exclude non material costs such as labor or factory overhead.		

Note. — Please work to the best of your ability with any related firm(s) to provide estimates for these data if your firm reported “transfers to related firms”.

- III-14. **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.

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**PART IV. — FINANCIAL INFORMATION**

**Note:** Completion of part IV is only required for firms that produced raw honey using 3,800 colonies or more in the United States annually in 2018 or 2019 or 2020 or using 3,800 colonies or more in Jan.-Sept. 2021. Beekeepers that qualify to fill out part II instead of part IV, may choose nonetheless to fill out the more detailed part IV in lieu of part II. Firms, however, should not fill out both part II and the more detailed part IV. Address questions on this part of the questionnaire to Jennifer Brinckhaus (202-205-3188, [jennifer.brinckhaus@usitc.gov](mailto:jennifer.brinckhaus@usitc.gov)).

- IV-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 IV.

Name	
Title	
Email	
Telephone	

- IV-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)? \_\_\_\_\_
- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include raw honey, if applicable:  
\_\_\_\_\_

- IV-3. **Financial reporting.**—Does your firm prepare profit/loss statements for raw honey specifically?  
☐ Yes ☐ No

- IV-4. **Business structure.**—Please indicate your company's business structure:

- ☐ Sole proprietorship
- ☐ Partnership (LLC, LP, or GP)
- ☐ S Corp.
- ☐ C Corp.
- ☐ Other (specify) \_\_\_\_\_

- IV-5. **Accounting basis.**— Please specify the accounting basis used by your company:

- ☐ U.S. GAAP
- ☐ IFRS (International Financial Reporting Standards)
- ☐ Tax accounting (Cash)
- ☐ Tax accounting (Accrual)
- ☐ 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 used to compile these data.*



- IV-6. **Cost accounting system.**—Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

- IV-7. **Allocation basis.**—Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

- IV-8. **Product listing.**—Please list the products or services for which revenue was received using the same bee colonies that are used to produce raw honey. Please provide the share of net sales accounted for by these products in 2020.

Products	Share of firm's 2020 revenue
Raw honey	%
Commercial pollination services	%
Beeswax	%
Package bees, queen bees, and nucs	%
Other – describe:	%
Other – describe:	%
Other – describe:	%

IV-9a. **Operations on all beekeeping activities.**—Report the revenue and related cost information requested below on the beekeeping activities of your firm's U.S. establishment(s). If your firm pays landowner rent or any other expenses with raw honey, the quantity and value of that honey should be included within the sales of raw honey. Similarly, the corresponding expense that is being paid should be included within the reported expenses. All net sales, whether sold commercially, transferred to a cooperative for processing, or internally consumed for processing or for retail sale, should be reported at the fair market value of raw honey. Do not report any cooperative distributions (i.e., patronage refunds) in this table.

<b>Quantity (in pounds) and value (in dollars)</b>					
<b>Item</b>	<b>Calendar years</b>			<b>January-September</b>	
	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2020</b>	<b>2021</b>
<b>Net sales quantities:</b>					
Sales of raw honey <sup>1</sup>					
<b>Net sales values:</b>					
Sales of raw honey <sup>1</sup>					
Commercial pollination fees					
Sales of other beekeeping-related products (e.g., beeswax, package bees, queen bees, nucs, etc.)					
Total net sales values	0	0	0	0	0
<b>Operating expenses</b>					
<b>Operating income (loss) for all beekeeping activities</b>	0	0	0	0	0
<b>All other non-operating expenses (specify below<sup>2</sup>)</b>					
<b>Other income:</b>					
Insurance proceeds or other government program income (specify below <sup>3</sup> )					
All other income (specify below <sup>4</sup> )					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0
<sup>1</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part III of this questionnaire.  <sup>2</sup> Describe what expenses have been included in "All other (non-operating) expenses":  <sup>3</sup> Specify the source of the government program income:  <sup>4</sup> Specify the source of all other income:					

- IV-9b. **Financial data reconciliation.**—The calculable line items from question IV-9a (i.e., total net sales values, total operating expenses, and 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>Yes</b>	<b>No</b>	<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. 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.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-9c. **Other beekeeping related products and services.**—Since January 1, 2018, has your firm earned revenue from beekeeping activities other than the sale of raw honey (e.g., from commercial pollination revenue, from the sale of , etc.)?

Yes – continue to question IV-9d.	No – skip to question IV-9f.
<input type="checkbox"/>	<input type="checkbox"/>

- IV-9d. **Allocation of beekeeping operating expenses.** – In the table below, report the amount of the operating expenses reported in question IV-9a that are **directly (and only) attributable** to the production of raw honey, commercial pollination services, or other beekeeping products, and **shared** amongst all beekeeping activities.

Expenses that are directly (and only) attributable to the production of raw honey, commercial pollination services, or other beekeeping products are costs that would not otherwise be incurred if the company decided to not produce these products or provide commercial pollination services.

**Note.** – If your firm is not able to directly segregate these expenses, but is able **to reasonably estimate this data, please do so**. If your firm does not keep records that allow you to segregate the costs in the manner requested, all operating expenses should be considered “shared” in the table below.

Examples of expenses directly attributable to **raw honey production** might include:

- Transportation costs and rent expense associated with achieving different forage sources for honey production
- Costs (labor and equipment) associated with extracting raw honey

Examples of expenses directly attributable to **commercial pollination** might include:

- Transportation and labor costs associated with transporting the bees for the purpose of commercial pollination
- Any increase in costs that arises from commercial pollination services (e.g., feed and medications necessary during commercial pollination)

Examples of **shared** costs might include:

- General costs associated with maintaining the health of the bees and beehives
- All wages paid during the “off-season”
- Depreciation (unless specifically identified to be related to one of the items above)
- Insurance
- Rent (unless included above)
- General and administrative expenses

IV-9d. **Allocation of beekeeping operating expenses.**—continued.

Item	Value (in dollars)				
	Calendar year			January-September	
	2018	2019	2020	2020	2021
<b>Operating expenses</b>					
Attributable <b><u>only</u></b> to the production of raw honey (specify below <sup>1</sup> )					
Attributable <b><u>only</u></b> to commercial pollination (specify below <sup>2</sup> )					
Attributable <b><u>only</u></b> to other beekeeping-related products, e.g., sale of package bees, beeswax, etc. (specify below <sup>3</sup> )					
<b><u>Shared</u></b> (i.e., all other) <sup>4</sup>	0	0	0	0	0
<b>Total operating expenses</b> <sup>5</sup>	0	0	0	0	0
<sup>1</sup> Provide a brief description of these expenses and describe why they are attributable only to the production of raw honey: _____. <sup>2</sup> Provide a brief description of these expenses and describe why they are attributable only to commercial pollination: _____. <sup>3</sup> Provide a brief description of these expenses: _____. <sup>4</sup> This line calculates the “Shared” expenses as the total operating expenses less the expenses that are attributable to only raw honey production, commercial pollination services, or other beekeeping-related products. <b><u>This should not be a negative number.</u></b> If a negative number appears in this line, it indicates that the combined expenses reported in the first three lines is greater than what was reported for operating expenses at question IV-9a. Please re-examine the expenses reported here and in IV-9a to revise as necessary. <sup>5</sup> This line will populate based on what is reported for operating expenses at question IV-9a.					

IV-9e. **Allocation of post-operating income and expense items** – Please report the amount of post-operating income line items from question IV-9a (i.e., those items listed in the table below) that should be attributed (whether directly or as an allocated portion) to raw honey operations.

Item	Calendar year			January-September	
	2018	2019	2020	2020	2021
	Value (in dollars)				
All other expenses (non-operating)					
Insurance proceeds or other government program income					
All other income					

- IV-9f. **Depreciation.**—Please report the amount of depreciation expense, if any, that is included in the financial results at IV-9a in each period that should be attributed (whether directly or as an allocated portion) to raw honey operations.

Item	Calendar year			January-September	
	2018	2019	2020	2020	2021
	Value (in dollars)				
Depreciation attributable to raw honey operations					

- IV-10. **Operations on sales of raw honey that is packaged for retail sale (i.e., in containers of 5 lb. or less).**—If your firm has had sales of raw honey that is packaged for retail sale (from raw honey produced by your firm), please report the revenue and incremental cost information, below.

Note – Except for possible differences from timing or product that is being held in inventory, the net sales quantity reported below should be reasonably close to the quantity of internal consumption for raw honey in retail packaging shipments reported in question III-5 (line H). However, the net sales value reported here should reflect the fair market value of the raw honey packaged for retail sale rather than the fair market value of the raw honey consumed as requested in question III-5.

For incremental operating expenses, please include any additional expenses associated with these sales that were incurred outside of the costs incurred to produce the raw honey. Examples may include retail packaging costs, selling expenses, etc. The incremental expenses reported here should not include any expenses that were reported in question IV-9a.

Item	Calendar year			January-September	
	2018	2019	2020	2020	2021
	Quantity (in pounds) and value (in dollars)				
<b>Net sales quantities:</b> Raw honey packaged for retail sale					
<b>Net sales values:</b> Raw honey packaged for retail sale					
Incremental operating expenses					

- IV-11. **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 question IV-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question IV-9a 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 IV-9a.

Item	Calendar			January-September	
	2018	2019	2020	2020	2021
	Value ( <i>in dollars</i> )				
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 describe whether these nonrecurring items are specific to raw honey production, or whether they are nonrecurring items that are shared across beekeeping activities. Also indicate the specific line item in table IV-9a where the nonrecurring item is classified.

	Description of the nonrecurring item	Describe whether this item is related only to the production of raw honey or whether it is shared across other beekeeping activities	Location of this item within question IV-9a (i.e., which line item)
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

IV-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of raw honey. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for raw honey in the normal course of business, please estimate this information based upon an appropriate method (such as production, sales, or costs).

**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 dollars)			
Item	Calendar years		
	2018	2019	2020
Total assets (net)			

IV-12b. **Description of asset values.**—Please provide explanations if there are any substantial changes in the 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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IV-13a. **Capital expenditures and research and development expenses.**—Report your firm's capital expenditures and research and development expenses for raw honey.

Value (in dollars)					
Item	Calendar years			January-September	
	2018	2019	2020	2020	2021
Capital expenditures					
Research and development expenses					

IV-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.

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IV-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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- IV-14. **Data consistency and reconciliation.**— Please note that we are requesting your firm's financial data for questions IV-9a, IV-12a, and IV-13a on a calendar-year basis. Please confirm that your firm reported these data on a calendar-year basis:

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

Please note the quantities and values reported in question IV-9a (for raw honey) should reconcile with the data reported in question III-5a (including export shipments).

***RECONCILIATION OF TRADE VS FINANCIAL DATA.**—Please ensure that the quantities and values reported for total shipments of raw honey in Part III equal the quantities and values reported for total net sales in Part IV of this questionnaire in each time period. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.*

Reconciliation	Calendar years			January-September	
	2018	2019	2020	2020	2021
<b>Quantity:</b> Trade data from question III-5a (U.S. shipment quantity and export quantity) less financial total net sales of raw honey quantity data from question IV-9a, = zero ("0").	0	0	0	0	0
<b>Value:</b> Trade data from question III-5a (U.S. shipment quantity and export quantity) less financial total net sales of raw honey value data from question IV-9a, = zero ("0").	0	0	0	0	0

Do these data in question IV-9a reconcile with data in question III-5a?

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

If your responses to any of the items in questions IV-15, IV-16, and IV-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.

IV-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 raw honey from Argentina, Brazil, India, Ukraine, and Vietnam?

<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	

- IV-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 raw honey from Argentina, Brazil, India, Ukraine, and Vietnam?

<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	

IV-17. **Anticipated effects of imports.**—Does your firm anticipate any negative effects due to imports of raw honey from Argentina, Brazil, India, Ukraine, and Vietnam?

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

IV-18. **Effects on financial performance of COVID-19.**— Since January 1, 2020, has the COVID-19 pandemic or any government actions taken to contain the spread of the COVID-19 virus affected the financial performance of your firm's operations on raw honey as reported in question IV-9a? In your response, please discuss the duration and timing of these impacts as they relate to your firm's financial performance.

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

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

Further information on this part of the questionnaire can be obtained from Lauren McLemore (202-205-3489, [lauren.mclemore@usitc.gov](mailto:lauren.mclemore@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

*Note: Please note any differences specific to certain types of raw honey (e.g. organic or conventional honey, honey color, monofloral or polyfloral sources, etc.) in available narrative spaces, or at question V-23 Other explanations.*

- V-2. **Price setting.**—How does your firm determine the prices that it charges for sales of raw honey (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"/>	

- V-3. **Discount policy.**—

(a) 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"/>	

(b) If your firm is part of a cooperative, please describe how prices are set for sales between members:

--

- V-4. **Pricing terms.**—On what basis are your firm's prices of domestic raw honey usually quoted (check one)?

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

- V-5. **Contract versus spot.**—Approximately what share of your firm's sales of its U.S.-produced raw honey 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 %

- V-6. **Contract provisions.**—Please fill out the table regarding your firm's typical sales contracts for U.S.-produced raw honey (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

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

- V-7. **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 raw honey?

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 %	

- V-8. **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 raw honey 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 %

V-9. **Geographical shipments.**—In which U.S. geographic market area(s) has your firm sold its U.S.-produced raw honey 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"/>

V-10. **Inland transportation costs.**—What is the approximate percentage of the cost of U.S.-produced raw honey that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent

V-11. **End uses.**—

- (a) List the top 3 products your firm makes using raw honey and estimate the percent of your total production cost that is accounted for by raw honey and by other inputs (such as labor, energy, and other raw materials).

End uses	Share of total cost in each of the product(s) your firm produces accounted for by				Total (should sum to 100.0% across)
	Raw honey		Other inputs		
Packaged for retail	%	+	%	=	0.0 %
Packaged for ingredients	%	+	%	=	0.0 %
Packaged for food service	%	+	%	=	0.0 %
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %



V-11. **End uses.**—continued.

(b) Please indicate which colors can be used in the following applications.

End uses	White	Extra light amber	Light amber	Amber	Additional explanation
For packaging/retail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For industrial ingredients	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Institutional applications (restaurants, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(c) Do end uses for organic and conventional raw honey differ?

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

Designation		End uses in which this designation is used
1.	Organic	
2.	Conventional	

V-12. **Substitutes.**—

(a) Can other products be substituted for raw honey in the production of packaged honey?

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

V-12. **Substitutes.**—continued.

(b) Can other products be substituted by the consumer for raw honey or packaged honey?

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

V-13. **Demand trends.**—Indicate how demand within the United States and outside of the United States (if known) for raw honey 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"/>	

V-14. **Product changes.**—Have there been any significant changes in the product range, product mix, or marketing of raw honey since January 1, 2018?

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

V-15. **Conditions of competition.**—

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

Check all that apply.	Please describe.
<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 raw honey since January 1, 2018?

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

V-16. **Supply constraints.**—

- (a) Has your firm refused, declined, or been unable to supply raw honey since January 1, 2018 and April 21, 2021 (examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

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

- (b) Has your firm experienced any supply constraints since the petition was filed on April 21, 2021?

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

V-17. **Raw materials.**—How have raw honey raw material prices changed since January 1, 2018?

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 raw honey.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

V-18. **Color interchangeability.**—Are the different colors of raw honey 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 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

Color pair	Extra light amber	Light amber	Amber
White			
Extra light amber			
Light amber			
For any product-pair of raw honey that is <i>sometimes</i> or <i>never</i> interchangeable, identify the product-pair and explain the factors that limit or preclude interchangeable use:			

V-19. **Interchangeability.**—Is raw honey produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

Country-pair	Argentina	Brazil	India	Ukraine	Vietnam	Other countries
United States						
Argentina						
Brazil						
India						
Ukraine						
Vietnam						

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

Country-pair	Argentina	Brazil	India	Ukraine	Vietnam	Other countries
United States						
Argentina						
Brazil						
India						
Ukraine						
Vietnam						

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

V-21. **Customer identification.**—List the names and contact information for your firm's 10 largest U.S. customers for raw honey since January 1, 2018. Indicate the share of the quantity of your firm's U.S. shipments of raw honey that each of these customers accounted for in 2020.

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



**V-22. Competition from imports.—**

- (a) **Lost revenue.**—Since January 1, 2018: To avoid losing sales to competitors selling raw honey from Argentina, Brazil, India, Ukraine, and Vietnam, 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 raw honey to imports of this product from Argentina, Brazil, India, Ukraine, and Vietnam?

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

- V-23. Other explanations.**—If your firm would like to further explain a response to a question in Part V 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 VI. — ALTERNATIVE PRODUCT INFORMATION**

Further information on this part of the questionnaire can be obtained from Andres Andrade (202-205-2078, [Andres.Andrade@usitc.gov](mailto:Andres.Andrade@usitc.gov)).

VI-1. **Comparability of U.S.-produced raw honey (as defined on page 2 of this questionnaire) that has not been packaged for retail sale and U.S.-produced raw honey packaged for retail sale.**—

For each of the following indicate whether listed honey products produced in the United States are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.

F: fully comparable or the same, *i.e.*, have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

O: no familiarity with products.

- (a) **Physical Characteristics and End Uses.** —The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>physical characteristics and uses</u> :
<b><u>Raw honey not packaged for retail sale</u></b> ( <i>i.e.</i> , not processed nor packaged for retail level sale) vs. <b><u>raw honey packaged for retail sale</u></b> ( <i>i.e.</i> , not processed but <u>is</u> packaged for retail level sale)		

**VI -1. Comparability of U.S.-produced raw honey not been packaged for retail sale and U.S.-produced raw honey packaged for retail sale. —continued.**

- F: fully comparable or the same, *i.e.*, have no differentiation between them;  
M: mostly comparable or similar;  
S: somewhat comparable or similar;  
N: never or not-at-all comparable or similar; or  
O: no familiarity with products.

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>interchangeability</u> :
<b><u>Raw honey not packaged for retail sale</u></b> ( <i>i.e.</i> , not processed nor packaged for retail level sale) vs. <b><u>raw honey packaged for retail sale</u></b> ( <i>i.e.</i> , not processed but <u>is</u> packaged for retail level sale)		

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :
<b><u>Raw honey not packaged for retail sale</u></b> ( <i>i.e.</i> , not processed nor packaged for retail level sale) vs. <b><u>raw honey packaged for retail sale</u></b> ( <i>i.e.</i> , not processed but <u>is</u> packaged for retail level sale)		

VI-1. **Comparability of U.S.-produced raw honey not been packaged for retail sale and U.S.-produced raw honey packaged for retail sale** —continued

F: fully comparable or the same, *i.e.*, have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

O: no familiarity with products.

- (d) **Manufacturing facilities, production processes, and production employees.**—Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i><u>manufacturing facilities, production processes, and production employees:</u></i>
<b><u>Raw honey not packaged for retail sale</u></b> ( <i>i.e.</i> , not processed nor packaged for retail level sale) vs. <b><u>raw honey packaged for retail sale</u></b> ( <i>i.e.</i> , not processed but <u>is</u> packaged for retail level sale)		

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i><u>customer and product perceptions:</u></i>
<b><u>Raw honey not packaged for retail sale</u></b> ( <i>i.e.</i> , not processed nor packaged for retail level sale) vs. <b><u>raw honey packaged for retail sale</u></b> ( <i>i.e.</i> , not processed but <u>is</u> packaged for retail level sale)		

VI-1. **Comparability of U.S.-produced raw honey not been packaged for retail sale and U.S.-produced raw honey packaged for retail sale** —continued.

F: fully comparable or the same, *i.e.*, have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

O: no familiarity with products.

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

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :
<b><u>Raw honey not packaged for retail sale</u></b> ( <i>i.e.</i> , not processed nor packaged for retail level sale) vs. <b><u>raw honey packaged for retail sale</u></b> ( <i>i.e.</i> , not processed but <u>is</u> packaged for retail level sale)		

## 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/raw\\_honey\\_argentina\\_brazil\\_india\\_ukraine\\_and/final.htm](https://www.usitc.gov/investigations/701731/2021/raw_honey_argentina_brazil_india_ukraine_and/final.htm).

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

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

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

**Pin:** **RAW**

- **E-mail.**—E-mail the MS Word questionnaire to [Andres.Andrade@usitc.gov](mailto:Andres.Andrade@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).