

U.S. PRODUCERS' QUESTIONNAIRE

ACRYLONITRILE-BUTADIENE RUBBER (NBR) FROM FRANCE, MEXICO, AND SOUTH KOREA

This questionnaire must be received by the Commission by **April 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 acrylonitrile-butadiene rubber ("NBR") from France, Mexico, and South Korea (Inv. Nos. 731-TA-1567-1569 (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 NBR (as defined on next page) in the United States at any time since January 1, 2019?

- ☐ **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: **NRUB**)

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 June 30, 2021, by Zeon Chemicals L.P. and Zeon GP, LLC (collectively "Zeon"), Louisville, Kentucky. 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/701731/2022/acrylonitrile_butadiene_rubber_france_South_Korea_and/final.htm

Acrylonitrile-butadiene rubber ("NBR") covered by these investigations is commonly referred to as acrylonitrile butadiene rubber or nitrile rubber (NBR). NBR is a synthetic rubber produced by the emulsion polymerization of butadiene and acrylonitrile with or without the incorporation of a third component selected from methacrylic acid or isoprene. This scope covers NBR in solid or nonaqueous liquid form. The scope also includes carboxylated NBR.

Excluded from the scope of this investigation is NBR in latex form (classified under Harmonized Tariff Schedule of the United States (HTSUS) subheading 4002.51.00). Latex NBR is commonly either (a) acrylonitrile/ butadiene polymer in latex form or (b) acrylonitrile/butadiene/ methacrylic acid polymer in latex form. The broader definition of latex refers to a water emulsion of a synthetic rubber obtained by polymerization.

Also excluded from the scope of this investigation is: (a) NBR containing additives incorporated during the compounding, mixing, molding, or use of NBR comprising greater than twenty percent of the total weight of the product. Additives would include, but are not limited to, fillers (e.g., carbon black, silica, clay); reinforcement agents (e.g., fibers, carbon black, silica); vulcanization agents (e.g., sulfur, sulfur complexes, peroxide); or NBR containing extension oils making up greater than forty percent of the total weight of the product. Such products would be generally classified under HTSUS subheading 4005; (b) NBR containing polyvinyl chloride (PVC) making up greater than twenty percent of total weight of the product; (c) hydrogenated NBR (commonly referred to as NBR) produced by subsequent dissolution and hydrogenation of NBR; and (d) reactive liquid polymers containing acrylonitrile and butadiene with amine, epoxy, carboxyl or methacrylate vinyl chemical functionality.

Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise processed in a third country, including by modifying physical form or packaging with another product, or performing any other finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the NBR.

NBR is currently classified in subheading 4002.59.00 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.

HNBR.—HNBR stands for “hydrogenated NBR” and is a product that is produced using NBR as a raw material input through a dissolution and hydrogenation production process. This product is ***not*** part of the definition of NBR, and as such, data for HNBR should ***not*** be included in any of the data tables in this questionnaire.

NIBR.—NIBR stands for “acrylonitrile-isoprene-butadiene rubber” and is produced by incorporating isoprene during the production (polymerization) process of NBR. This product is included in the definition of NBR, and as such, data for NIBR should be included within all the data tables requesting information on NBR in this questionnaire.

XNBR.—XNBR stands for “carboxylated NBR” and is produced by incorporating methacrylic acid during the production (polymerization) process of NBR. This product is included in the definition of NBR, and as such, data for XNBR should be included within all the data tables requesting information on NBR in this questionnaire.

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) 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 NBR, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ 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
☐	☐

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

Country	Investigation type	Support	Oppose	Take no position
France	Antidumping duty	☐	☐	☐
Mexico	Antidumping duty	☐	☐	☐
South Korea	Antidumping duty	☐	☐	☐

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 NBR from France, Mexico, or South Korea into the United States or that are engaged in exporting NBR from France, Mexico, or South Korea to the United States?

“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.

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Kristina Lara** (202-205-3386, Kristina.Lara@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 NBR since January 1, 2019.

<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>
☐	Plant openings	
☐	Plant closings	
☐	Relocations	
☐	Expansions	
☐	Acquisitions	
☐	Consolidations	
☐	Prolonged shutdowns or production curtailments	
☐	Revised labor agreements	
☐	Weather related events	
☐	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 NBR?

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 for the specified periods. Include in this discussion an indication of the timing and duration of the impacts and whether and how your firm has adapted to these impacts.	
☐	☐	January 1, 2020 – December 31, 2020	
☐	☐	January 1, 2021 – December 31, 2021	

- II-2c. **Anticipated changes in operations.**—Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of NBR in the future?

No	Yes	If yes, provide details as to the time, nature, and significance of such changes and provide underlying assumptions.
☐	☐	

- 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 NBR, 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 1,000 pounds)			
Item	Calendar year		
	2019	2020	2021
Overall production capacity¹			
Production of:			
NBR ²	0	0	0
Out-of-scope production.-- Latex NBR ³			
Other products ⁴			
Subtotal, out-of-scope production	0	0	0
Total production using same machinery or workers	0	0	0
¹ Data reported for capacity (first line) should be greater than data reported for total production (last line). ² Data entered for production of NBR will populate here once reported in question II-7. ³ Only report latex NBR production that was not used as an input to produce in-scope product. ⁴ 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.

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- II-3d. **Production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

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- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between NBR 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.
☐	☐	

- (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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- II-5. **Tolling.**--Since January 1, 2019, has your firm been involved in a toll agreement regarding the production of NBR?

"Toll agreement"--Agreement between two firms whereby the first firm furnishes the raw materials and the second firm 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.
☐	☐	

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

- (a) **Firm's FTZ operations.**--Does your firm produce NBR in and/or admit NBR 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).
☐	☐	

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

No	Yes	If yes--Identify the firms and the FTZs.
☐	☐	

- II-7. **Production, shipment, and inventory data** --Report your firm's production capacity, production, shipments, and inventories related to the production of NBR in its U.S. establishment(s) during the specified periods.

"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 and production for another firm under a toll agreement.

"NBR" –Acrylonitrile-isoprene-butadiene rubber, which is produced by the incorporation of isoprene during the polymerization process.

"XNBR" – Carboxylated NBR, which is produced by the incorporation of methacrylic acid during the polymerization process.

"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-7. **Production, shipment, and inventory data.--Continued**

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Calendar year		
	2019	2020	2021
Average production capacity¹ (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production:			
NIBR (quantity)			
XNBR (quantity)			
All other NBR (quantity)			
Total production (quantity) (C)	0	0	0
U.S. shipments:			
Commercial shipments:			
Quantity (D)			
Value (E)			
Internal consumption:²			
Quantity (F)			
Value ² (G)			
Transfers to related firms:²			
Quantity (H)			
Value ² (I)			
Export shipments:³			
Quantity (J)			
Value (K)			
End-of-period inventories (quantity) (L)			
¹ 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 _____. ² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. ³ Identify your firm's principal export markets: _____.			

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather 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		
	2019	2020	2021
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.			

- II-8. **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.

"Custom mixers" – Companies that provide rubber compounding and mixing services. They purchase synthetic rubber (including solid NBR) and add other components to produce a formulation (colorants, reinforcing agents, process additives, vulcanization agents). The compound formulations may be the intellectual property of the custom mixer or the custom mixer may be utilizing a compound formulation provided by their customer. Custom mixers will sell their compound formulation in strip or other form to the rubber part maker, who will mold/extrude/shape and vulcanize the part to form a finished article.

Quantity (in 1,000 pounds), value (in \$1,000)			
Item	Calendar year		
	2019	2020	2021
Channels of distribution:			
U.S. shipments:			
To distributors:			
Quantity (M)			
Value (N)			
To custom mixers or independent compounders:			
Quantity (O)			
Value (P)			
To rubber parts manufacturers and other end users: ^{1,2}			
Quantity (Q)			
Value (R)			
¹ If shipped to rubber parts manufacturers and other end users, list the types of products produced by those firms:			
² Please list all other types of end users to whom these shipments were made:			

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

Reconciliation	Calendar year		
	2019	2020	2021
Quantity: M + O + Q – D – F – H = zero ("0"), if not revise.	0	0	0
Value: N + P + R – E – G – I = zero ("0"), if not revise.	0	0	0

- II-9. **U.S. shipments by form and acrylonitrile content.**—Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) in 2021 by form and acrylonitrile content.

Quantity (in 1,000 pounds)			
Item	Calendar year 2021		
	In bale/slab form	In ground, particulate, pellet, or powder form	In liquid form ¹
U.S. shipments:			
Acrylonitrile content less than 26% Quantity (S):			
Acrylonitrile content between 26% and less than 31%: Quantity (T)			
Acrylonitrile content between 31% and 35%: Quantity (U)			
Acrylonitrile content between greater than 35% and 41%: Quantity (V)			
Acrylonitrile content greater than 41%: Quantity (W)			
¹ For NBR in liquid form, please report in gross weight, as opposed to dry weight.			

RECONCILIATION. — Please ensure that the total quantity reported for U.S. shipments by NBR type (i.e., lines S through W) equal the quantities reported for 2021 U.S. shipments reported in II-7 (i.e., lines D, F, and H). 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 2021
$S + T + U + V + W - D - F - H = \text{zero ("0")}$, if not revise.	0

- II-10. **Continuous vs. batch production.**—Report your firm's shares of NBR production by production method in 2021.

"Continuous production"—NBR production process that relies on a series of linked reactors through which producers feed input monomers to generate NBR.

"Batch production"— NBR production process in which producers feed input monomers into separate reactors that are not linked in a series.

Calendar year 2021	
Item	Share of quantity (percent)
Batch production ¹	
Continuous production ²	
Total (should sum to 100 percent)	0.0
¹ Of the ten highest-volume NBR grades your firm produces, identify which ones are produced using batch production: ____.	
² Of the ten highest-volume NBR grades your firm produces, identify which ones are produced using continuous production: ____.	

- II-11a. **Custom specifications.**—Please quantify and describe the portion of your firm's U.S. shipments for which your firm's customers require off-spec or custom specifications.

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- II-11b. **Custom specifications for single customer.**—Please quantify and describe the portion of your firm's U.S. shipments which are custom-produced grades for which the grade is only sold to one customer and not offered for sale to other customers.

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- II-11c. **Declined due to custom specifications.**—Has your firm declined to sell NBR based on a potential customer's off-spec or custom specification, and/or has a potential customer declined your NBR based on the customers' off-spec or custom specification?

No	Yes	If yes--Please identify the customer(s), the custom specification(s) requested, and the reason(s) for your firm's and/or the potential customer's decision not to enter into a sale for the merchandise requested.
☐	☐	

- II-12. **Employment data.**--Report your firm's employment-related data related to the production of NBR 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.

"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		
	2019	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-13. **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-14. **Purchases.**--Has your firm purchased NBR produced in the United States or in other countries since January 1, 2019? (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.
☐	☐	

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 1,000 pounds)			
Item	Calendar year		
	2019	2020	2021
Purchases from U.S. importers¹ of NBR from—			
France			
Mexico			
South Korea			
Japan			
All other sources			
Purchases from domestic producers²			
Purchases from other sources³			
¹ 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: _____. ² Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. ³ Please list the name of the firm(s) from which your firm purchased this product: _____.			

- II-15. **Imports.**--Since January 1, 2019, has your firm imported NBR?

No	Yes	
☐	☐	If yes-- <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

- II-16. **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.

--

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 NBR: _____
2. Does your firm prepare profit/loss statements for NBR:
☐ 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 NBR, 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 NBR and provide the share of net sales accounted for by these products in 2021.

Products	Share of sales
NBR	%
	%
	%
	%
	%

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

Yes--Continue to question III-7	No—Skip to question III-9a.
☐	☐

- III-7. **Inputs from related suppliers detailed.**--Please identify the inputs used in the production of NBR 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 for 2021. 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 in 2021
Input valuation as recorded in the firm’s accounting books and records		

- 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 NBR) in a manner consistent with your firm’s accounting books and records.

Yes	No	If no--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.
☐	☐	

- III-9a. **Operations on NBR.**--Report the revenue and related cost information requested below on the NBR operations of your firm's U.S. establishment(s).¹ Do not report resales of products. 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.

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Calendar year		
	2019	2020	2021
Net sales quantities: ²			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
Net sales values: ²			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
Cost of goods sold (COGS): ³			
Raw materials			
Direct labor			
Other factory costs			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
Selling, general, and administrative ("SG&A") expenses			
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense and income items, net ⁴			
Net income or (loss) before income taxes	0	0	0
Depreciation/amortization included above			
¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations. ² 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. ³ COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers. ⁴ 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.			

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

- 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?

		If no --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.
Yes	No	
☐	☐	

- III-9c. **Raw materials.**--Please report the share of total raw material costs in 2021 (reported in III-9a) for the following raw material inputs:

Input	Share of total raw material costs (percent)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Butadiene		☐	☐
Acrylonitrile		☐	☐
Other material inputs ¹		☐	☐
Total (should sum to 100 percent)	0.0		
¹ Please indicate any notable inputs included in "other material inputs" and provide the share of the total raw material costs accounted for by each: _____.			

- III-10. **Nonrecurring items (charges and gains) included in the subject product financial results.**--For each year for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-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 III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated 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 question III-9a.

Item	Calendar year		
	2019	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 within table III-9a where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
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).

--

III-12a. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of NBR. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for NBR 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.

Note: Total assets should reflect net assets (i.e., 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	Calendar year		
	2019	2020	2021
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 NBR.

Value (in \$1,000)			
Item	Calendar year		
	2019	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.

--

- III-14. **Data consistency and reconciliation.** — Please note that we are requesting your firm's financial data for questions III-9a, III-12a, and III-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.
☐	☐	

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-7 (including export shipments) as long as they are reported on the same calendar year basis.

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. 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		
	2019	2020	2021
Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
Value: Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

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

Yes	No	If no, please explain.
☐	☐	

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, 2019, 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 NBR from France, Mexico, and/or South Korea?

No	Yes	If yes, my firm has experienced actual negative effects as follows.
☐	☐	

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

- III-16. **Effects of imports on growth and development.**--Since January 1, 2019, 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 NBR from France, Mexico, and/or South Korea?

No	Yes	
☐	☐	If yes, my firm has experienced actual negative effects as follows.

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

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

No	Yes	If yes, my firm anticipates negative effects as follows.
☐	☐	

- 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 NBR as reported in III-9a?

No	Yes	If yes, please describe these effects.
☐	☐	

- 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 Craig Thomsen (202-205-3226, craig.thomsen@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, 2019 of the following products produced by your firm.

Product 1.--NBR with Acrylonitrile content greater than or equal to 31% (inclusive) and less than or equal to 35% (inclusive) and Mooney Viscosity of 30 to 80, without any third monomer, sold in bales or slabs ranging from 25-45 kgs.

Product 2.--NBR with Acrylonitrile content greater than or equal to 31% (inclusive) and less than or equal to 35% (inclusive) and Mooney Viscosity of 30 to 80, without any third monomer, ground/particulate/pellet form, sold in 20-30 kg bags.

Product 3.--NBR with Acrylonitrile content greater than or equal to 26% (exclusive) and less than or equal to 31% (exclusive) or Acrylonitrile content greater than 35% (exclusive) and less than or equal to 41% (exclusive), and Mooney Viscosity of 30 to 80, without any third monomer, sold in bales or slabs ranging from 25-45 kgs.

Product 4.--NBR with Acrylonitrile content less than 26% (inclusive) or Acrylonitrile content greater than 41% (inclusive), and Mooney Viscosity of 30 to 80, without any third monomer, sold in bales or slabs ranging from 25-45 kgs.

Product 5.—XNBR, any Acrylonitrile content, made from methacrylic acid, sold in bales or slabs ranging from 25-45 kgs.

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 2019-December 2021, 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)?

☐	Yes. --Please complete the following pricing data tables as appropriate.
☐	No. --Skip to question IV-3.

IV-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

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

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

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

² Pricing product definitions are provided on the first page of Part 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. Continued.Report data in pounds (not 1,000s) and actual dollars (not 1,000s).

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

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

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

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:	✓ if Yes
In actual dollars (not \$1,000)?	☐
In pounds (not 1,000s of pounds)?	☐
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	☐
Net of all discounts and rebates?	☐
Have discounts, rebates, and returns been credited to the quarter in which the sale occurred?	☐
Quantities do not exceed commercial shipments in question II-7 in each year?	☐
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 NBR (*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
☐	☐	☐	☐	

- 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
☐	☐	☐	☐	

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

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

- IV-6. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced NBR in 2021 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 2021 sales	%	%	%	%	0.0 %

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced NBR (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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	☐	☐	☐
	<i>No</i>	☐	☐	☐
Fixed quantity and/or price	<i>Quantity</i>	☐	☐	☐
	<i>Price</i>	☐	☐	☐
	<i>Both</i>	☐	☐	☐
Indexed to raw material costs ¹	<i>Yes</i>	☐	☐	☐
	<i>No</i>	☐	☐	☐
Not applicable		☐	☐	☐
¹ 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 NBR?

Source	Share of 2021 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (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 NBR 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	%
Total (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 NBR since January 1, 2019 (check all that apply)?

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

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

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

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

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

☐ 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 NBR?		
		No	Yes	Explanation
1.		☐	☐	
2.		☐	☐	
3.		☐	☐	

IV-14. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for NBR has changed since January 1, 2019. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuated higher	Fluctuated lower	Explanation and factors
Within the United States	☐	☐	☐	☐	☐	
Outside the United States	☐	☐	☐	☐	☐	

IV-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of NBR since January 1, 2019?

No	Yes	If yes, please describe and quantify if possible.
☐	☐	

IV-16. **Conditions of competition.**--

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

Check all that apply.	Please describe.
☐ No	Skip to next question.
☐ Yes-Business cycles (e.g. seasonal business)	
☐ Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for NBR since January 1, 2019?

No	Yes	If yes, describe.
☐	☐	

- IV-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply NBR at any time between January 1, 2019 and June 30, 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, impact from changes in operations listed in II-2a, declaring a force majeure, etc.)?

No	Yes	If yes, please describe, including the reason, timing, and duration of the constraint.
☐	☐	

(b) Has your firm experienced any supply constraints since the petition was filed on June 30, 2021?

No	Yes	If yes, please describe, including the reason, timing, and duration of the constraint.
☐	☐	

- IV-18. **Raw materials.**--How have NBR raw material prices changed since January 1, 2019?

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 NBR.
☐	☐	☐	☐	

IV-19. **Interchangeability.**—Is NBR 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	France	Mexico	South Korea	Other countries
United States				
France				
Mexico				
South Korea				
For any country-pair producing NBR 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-20. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between NBR 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	France	Mexico	South Korea	Other countries
United States				
France				
Mexico				
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 NBR, identify the country-pair and relevant factors and report the advantages or disadvantages imparted by such factors:				

IV-21. Interchangeability among types of NBR.—

(a) Can the following types of NBR (based on their acrylonitrile (ACN) content) be used interchangeability by your firm or your firm's customers in the same end use applications?

Benchmark product	Comparison product	Always	Frequently	Sometimes	Never
ACN: ≥31% and ≤35%	ACN: ≥26% and <31% or ≥35% and ≤41%	☐	☐	☐	☐
ACN: ≥31% and ≤35%	ACN: <26% or ACN >41%	☐	☐	☐	☐
ACN: ≥26% and <31% or ≥35% and <41%	ACN: <26% or ACN >41%	☐	☐	☐	☐

For any product-pair which is sometimes or never able to be used interchangeably in your firm's or your customer's end use applications, please explain the factors that limit or preclude interchangeable use.

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(b) Can NBR made using batch processing be substituted with NBR made using continuous production?

No	Yes	If yes, please describe and quantify if possible.
☐	☐	

IV-22. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for NBR since January 1, 2019. Indicate the share of the quantity of your firm's U.S. shipments of NBR that each of these customers accounted for in 2021.

	Customer's name	City	State	Share of 2021 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

IV-23. Competition from imports.--

- (a) **Lost revenue.**--Since January 1, 2019: To avoid losing sales to competitors selling NBR from France, Mexico, or South Korea, did your firm:

Item	No	Yes
Reduce prices	☐	☐
Roll back announced price increases	☐	☐

- (b) **Lost sales.**--Since January 1, 2019: Did your firm lose sales of NBR to imports of this product from France, Mexico, or South Korea?

No	Yes
☐	☐

- 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.

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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://usitc.gov/investigations/701731/2021/acrylonitrile_butadiene_rubber_france_South_Korea_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: NRUB

- **E-mail.**—E-mail the MS Word questionnaire to Kristina.Lara@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).