# **U.S. PURCHASERS' QUESTIONNAIRE**

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

This questionnaire must be received by the Commission by <u>April 1, 2022</u>

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 it antidumping investigations concerning NBR from France, Mexico, and/or 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 possession (19 U.S.C. § 1333(a)). Further information on this questionnaire can be obtained from Craig Thomsen (202-205-3226, craig.thomsen@usitc.gov).

Name of firm

City		Stat	te	_ Zip Code _			.
Website							
Has your firm January 1, 20	-	(as defined on next page) f	from <u>any</u> sou	urce (domesti	c or foreign) at	any time sinc	2
☐ NO	(Sign the certific	ation below and promptly ret	turn <b>only</b> this	page of the qu	estionnaire to th	ne Commission)	
YES	(Complete all pa	irts of the questionnaire, and	return the en	tire questionna	aire to the Comm	nission)	
		pbox.usitc.gov/oinv/. (Pl					
that the infor	mation herein s	supplied in response to t	his question	nnaire is cor	nplete and co	rrect to the	best of my
ge and belief and the second this certification provided in the second the se	nd understand to ation I also grade this questionna ame or similar nowledge that is pring or maintains relating to to S. government experies and the second amendment of the s	hat the information subm nt consent for the Comm iire and throughout this p	nitted is subj nission, and proceeding in response to (i) by the Co or a related and opera ersonnel, so	iect to audit its employe n any other i o this reques ommission, i proceeding, o tions of the	and verification es and contract mport-injury po et for informat ts employees a or (b) in intern Commission i	n by the Com ct personnel, roceedings co tion and throi and Offices, a al investigation	mission. By to use the nducted by aghout this nd contract ons, audits, er 5 U.S.C.
e and belief ag this certification provided in its indicated in the state of the st	nd understand to ation I also grade this questionna same or similar nowledge that a popen grade the toping or maintains relating to the sign appropriate	hat the information subm nt consent for the Comm ire and throughout this p nerchandise. information submitted in ne disclosed to and used: ining the records of this of the programs, personnel, employees and contract pe	nitted is subj nission, and proceeding in response to (i) by the Co or a related and opera ersonnel, so	iect to audit its employe n any other i o this reques ommission, i proceeding, o tions of the	and verification es and contract mport-injury po et for informat ts employees a or (b) in intern Commission i	n by the Com ct personnel, roceedings co tion and throi and Offices, a al investigation	mission. By to use the nducted by aghout this nd contract ons, audits, er 5 U.S.C.

#### 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

<u>Acrylonitrile-butadiene rubber ("NBR")</u> 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.

<u>HNBR</u>.—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.

<u>NIBR</u>.—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.

<u>Purchaser</u>.--Any firm engaged, either directly or through a parent company or subsidiary, in purchasing NBR from another firm that produces, imports, or otherwise distributes NBR.

**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.

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

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

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

-1a.	<u>Establishments covered.</u> Provide the name and address of your U.S. establishment(s) covered by this questionnaire, if different from that listed on the cover page. Firms operating more than one establishment should combine the data for all establishments into a single response.					
		•	e <u>purchase</u> of NBR, including auxiliary physically separate from) such facilities.			
-1b.	Stock symbol information stock exchange and tradin		n is publicly traded, please specify the			
-1c.		firm or parent firm is represective the name of the law firm	sented by external counsel in relation to mand the lead attorney(s).			
	Law firm:					
	Lead attorney(s):					
2.		owned, in whole or in part, b st the following information	y any other firm?  I, relating to the ultimate parent/owner.			
	Firm name	Country	Extent of ownership (percent)			

"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.

I-3.	Related importers/exportersDoes your firm have any related firms, either domestic or foreign, which import NBR into the United States or which export NBR to the United States?  No YesList the following information.					
	Firm name	Country	Affiliation			
I-4.	Related producersDoes produce NBR?	your firm have any related fir	rms, either domestic or foreign, which			
	☐ No ☐ YesLis	st the following information.				
	Firm name	Country	Affiliation			

#### **PART II.--PURCHASES**

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

Name	
Title	
Email	
Telephone	

II-1. <u>Purchases and imports.--</u>Report <u>separately</u> your firm's domestic purchases and imports of NBR.

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

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

	2019	2020	2021		
ltem	Quantity (in 1,000 pounds)				
Purchases of NBR produced in—					
United States					
France					
Mexico					
South Korea					
Japan					
All other countries <sup>1</sup>					
Sources unknown <sup>2</sup>					
Total purchases	0	0	0		
Imports of NBR from—					
France					
South Korea					
Mexico					
Japan					
All other countries <sup>1</sup>					
Total imports <sup>3</sup>	0	0	0		
<sup>1</sup> Please identify these countries:					
<sup>2</sup> Please indicate the firm(s) from which y					
<sup>3</sup> If your firm imported NBR at any time s importers' questionnaire in this proceeding.		olease also complete	and return a U.S.		

II-2. Changes in purchasing patternsPlease indicate how the shares of your firm's purchases of NBR from different sources have changed since January 1, 2019.							
Source of purchases	Did not		Increased	Constant	Fluctuated	Explanation for trend	
United States							
France							
Mexico							
South Korea							
Japan							
All other countri	ies						
Sources unknov	vn 🗌						
(a)	Mexico, each sub	and/or South K Dject country.	Yes	d of purcha	sing U.Spro	mports of NBR from France, duced NBR? Respond for  No all countries, skip to next	
	France	(also respond	also respond to parts (b) and (c))			question)	
	Mexico				П		
Sc	outh Korea		 				
(b) If you responded "Yes" to part (a), was the imported product priced lower than the domestic product?					ct priced lower than the		
	Source		Yes			No	
	France						
	Mexico						
South Kore							

II-3.	Continued.

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

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2019 (in 1,000 pounds)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
France				
Mexico				
South Korea				

# II-4. U.S. producers and import competition.—

(a) Since January 1, 2019, in connection with a sale or offer to sell NBR to your firm, did U.S. producers reduce their prices of domestically produced NBR in order to compete with lower-priced imports of NBR from the subject countries? Respond for each subject country.

Source	Yes (also respond to question part (b))	No (If "No" for all countries, skip to next question)	Don't know
France			
Mexico			
South Korea			

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

Source	Estimated reduction in U.S. prices (percent)	Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors
France	%	
Mexico	%	
South Korea	%	

II-5. Purchases and imports use by sector.--Report the share of your firm's purchases and/or imports of NBR by their end use sector (If your firm is a reseller/distributor, indicate to what industry/sector you eventually sold those purchases or imports; if your firm is a custom mixer, likewise indicate to what industry/sector your firm eventually sold those processed NBR products; if your firm is a rubber parts manufacturer but not the ultimate end user of those parts, what industry/sector your firm sold those rubber parts to; and finally, if your firm is both the rubber parts manufacturer and the producer of the final customer good, i.e., your firm is also the ultimate end user of the rubber parts, report based on what sector your firm is in).

Share of quantity (percent)						
Calendar year						
Sector of ultimate end use	2019	2020	2021			
Automotive sector						
Oil and gas sector						
Industrial equipment and machinery sector						
Other sector:						
Unknown sector(s)						
Total (sum should to 100.0 percent)	0.0	0.0	0.0			
If shipped to rubber parts manufacturers, list the product types produced by those firms:						

II-6. <u>Country knowledge.</u>--Please indicate the countries of origin with which your firm has experience or information in the NBR market.

United States	France	Mexico	South Korea	Japan	Other countries	Other countries (specify)

II-7. <u>Supplier identification.</u>--Please list your firm's <u>FIVE</u> largest suppliers for NBR since January 1, 2019. Also, provide the share of the quantity of your firm's total purchases of NBR that each of these suppliers accounted for in 2021.

No.	Supplier's name	City and state	Share of quantity of 2021 purchases
1			%
2			%
3			%
4			%
5			%

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

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

End user (Auto)	End user (Oil/Gas)	End user (Machinery/ Industrial Equipment)	End user (Other)	Custom mixer	Distributor	Other
Describe "(	Other":					

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

III-2. <u>Competition for sales.</u>--Does your firm compete for sales to customers with the manufacturers or importers from which your firm purchases NBR?

No	Yes	If yes, please describe.

III-3.	<b>Types of customers</b> What a	re the major types o	of consumers to which	your firm sells NBR?

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

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

	Share of total cost in each of the product(s) your firm produces accounted for by				<b>Total</b> (should
Product(s) your firm produces	NBR		Other inputs		sum to 100.0% across)
	%	+	%	=	0.0 %
	%	+	%	Ш	0.0 %
	%	+	%	П	0.0 %

	<u>Demand fo</u>	r end-use	products					
		s the dema 2019?	and for your	firm's final រុ	products	inco	rporating NBR c	hanged since January
	1	ncreased	No chan	ge Dec	reased	F	luctuated highe	r Fluctuated lower
	(b) Ha	s this had	any effect on	your firm's	demand	for	NBR?	
		No	Yes				Explain	
			End use in	which this	<b> </b>	lave	-	price of this substitute price for NBR?
	Substitute		substitut	e is used	No	Yes		Explanation
1.								
						$\Box$		
2.						Ш		
3.								
3.	States (if k	nown) for	NBR has char that have affe	nged since Ja	anuary 1	, 201 in de <b>ted</b>	l9. Explain any t	ide of the United rends and describe Explanation and facto

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III-8.	Country preferencesDo you or your customers ever specifically order NBR from one country
	in particular over other possible sources of supply?

No	Yes	If yes, identify the countries, the type(s) of NBR involved, and explain the reason(s) for any preferences.

III-9. <u>Importance of purchasing domestic product.</u>--Please fill out the table below, estimating the percentage of your firm's total 2021 purchases of NBR that required NBR produced in the United States.

	Estimated percentage of your firm's total 2021 purchases of NBR
Purchases that did not require domestic product	%
Purchases that were required by law or regulation to be domestic product (e.g., government purchases under "Buy American" provisions)	%
Purchases that were not required by law or regulation, but were required by your customers to be domestic product	%
Purchases that were required to be domestic product for other reasons	
(explain:)	%
Total (should sum to 100.0%)	0.0 %

III-10.	<u>Conditions of competition</u>

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

Check a	all that apply.		Please describe.					
	No		Skip to next question.					
	Yes-Business seasonal busi							
	Yes-Other dis conditions of							
(b)	b) Have there been any changes in the business cycles or conditions of competition for NBR since January 1, 2019?							
No	Yes	If ves. describ	e.					

	 1. 705, 000011201	

III-11. <u>Decisions based on producer and country-of-origin.</u>--How often does your firm, and if known, do your customers, make purchasing decisions involving NBR based on its producer or country of origin?

Item	Always	Usually	Sometimes	Never	If at least sometimes, explain.				
Decision based on producer									
Your firm									
Your customers									
	Decision based on country of origin								
Your firm									
Your customers									

Avai	lability in marke		No	Voc	Please explain, noting the countries and reasons for the
115-	produced		No	res	changes.
	ect import	·			
	subject im				
3. <u>Supp</u> (a)	January "contro custom	y firm ref y 1, 2019 olled orde ners, deliv	and Juer entreering	ine 3 y," d less t	ned, or been unable to supply your firm with NBR between 0, 2021 (examples include placing customers on allocation or eclining to accept new customers or renew existing than the quantity promised, being unable to meet timely eclaring a force majeure, etc.)?
	No				e describe, including the supplier, supplier location, reason, the duration of the constraint.
(b)		y firm exp	perien	ced a	ny supply constraints since the petition was filed on June 30,
(b)	Has an 2021?	If	yes, <sub>I</sub>	oleas	ny supply constraints since the petition was filed on June 30, e describe, including the supplier, supplier location, reason, duration of the constraint.

III-15.	<u>Purchas</u>	ing freq	uency								
	(a)	How frequently does your firm make purchases of NBR (check one)?									
		Daily	Weekl	y Monthly	Quarterly	Annually	Other	If other, specify			
	(b)	Has this	las this purchasing frequency changed since January 1, 2019?								
		No	No Yes If yes, please describe.								
III-16.	Raw material prices.—										
	(c) Is your firm familiar with the prices for raw materials used in the production of NBR?										
		N	0	Yes – please answer (b)							
			]		]						
		(d) Has information on raw material prices affected your firm's negotiations or contracts to purchase NBR since 2019?									
		No	Yes E	xplain							
III-17.				<u>ntacted</u> How se? Between _			oes your t	firm generally contact			
III-18.		r negotia and pur		•	purchases of	NBR usually	involve r	negotiations between			
	No	Yes	1 -	s, explain the fa firm quotes co	-	_		tes and note whether ns.			

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III-19.	<u>Change i</u>	n supplie	<u>rs</u> Has yo	our firm changed suppliers since January 1, 2019?						
	No	Yes		ease list the supplier(s), whether the firm was added or dropeasons for the change.	pped,					
III-20.	<u>New suppliers.</u> Are you aware of any new suppliers, either foreign or domestic, that have entered the market since January 1, 2019?									
	No	Yes	If yes, ple	ease identify the firms.						
III-21.	<ul> <li>Supplier certification/qualification Do you require your suppliers to be or to become certified or qualified to sell NBR to your firm?</li> <li>If yes, provide the following information.         <ul> <li>The number of days to certify/qualify a new supplier.</li> <li>A general description of the certification or qualification process. Also, a brief description of the factors that you consider when qualifying a new supplier (e.g., quality of product, reliability of supplier, etc.).</li> </ul> </li> </ul>									
	No	Yes	Number of days	Please note a brief description of the process and factors/requirements involved, and whether validation of supplier can be conducted internally or requires testing by users (if your firm is not the end user).						
III-22.	in their a	Failure to certify/qualifySince January 1, 2019, have any domestic or foreign producers failed in their attempts with your firm to certify/qualify their NBR, or otherwise fail to meet pertinent specifications, or, if already certified/qualified, have any producers lost their approved status?								
	No	Yes		ease identify these firms, the countries where they are locate easons why they failed the certification/qualification.	ted,					

Technical support/service

U.S. transportation costs

1.			
2.			
3.			
Please list any other factors that are	very important in	your purchase de	cisions:
Purchasing factorsPlease rate the in purchasing decisions for NBR.  Factor	Very important	Somewhat important	Not
Availability			
Certification/Qualification			
Delivery terms			
Delivery time			
Discounts offered			
Minimum quantity requirements			
Meet customer specifications			
Packaging			
Payment terms			
Price			
Price lock for > 30 days			
Product consistency			
Product range			
Quality meets industry standards			
Quality exceeds industry standards			
Reliability of supply			

III-25.	Quality chara quality of NBF		-Wha	t characterist	ics does your	firm consider	when evaluati	ng the	
III-26.	Minimum qua					ving countries	meet minimun	n quality	
	Soi	urce		Always	Usually	Sometimes	Rarely or never	Don't know	
	United States								
	Mexico								
	South Korea								
	Mexico Japan								
	Other:								
III-27.		Frequency of decisions based on priceHow often does your firm purchase the NBR that is offered at the lowest price?							
	Alway	/S		Usually	Som	Sometimes			
III-28.	Price leadersA price leader is defined as (1) one or more firms that initiate a price change, either upward or downward, that is followed by other firms, or (2) one or more firms that have a significant impact on prices. A price leader is not necessarily the lowest-priced supplier.  Please list the names of any firms you considered price leaders in the NBR market since January 1, 2019.								
	Firm(s)	Describ	e hov	w the firm(s)	exhibited prid	ce leadership			

#### PART IV.—PRODUCT COMPARISONS

IV-1. <u>Interchangeability.--</u>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 0 in the table below:

- A = the products from a specified country-pair are *always* interchangeable
- F = the products are *frequently* interchangeable
- S = the products are *sometimes* interchangeable
- N = the products are *never* interchangeable
- 0 = *no familiarity* with products from a specified country-pair

Country-pair	France	Mexico	South Korea	Other countries
United States				
France				
Mexico				
South Korea				

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

IV-2. <u>Factors other than price</u>.--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 purchases of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	France	Mexico	South Korea	Other countries
United States				
France				
Mexico				
South Korea				

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

IV-4. Int	erchangeabilit	y among t	ypes of	NBR.—
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(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?

		,	τ	τ	,				
Benchmark produc	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% o >=35% and <41%	ACN: r <26% or ACN >41%								
For any product-pair which is <u>sometimes</u> or <u>never</u> 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.									
preclude interchangeable use.									
(b) Can NBR made production?	using batch processing I	be substituted	l with NBR ma	ade using cont	inuous				
No Yes	If yes, please describe	and quantify	if possible.						

IV-5. <u>Factor country comparisons.</u>--For the factors listed below, please rate how NBR produced in each country you identified in your response to the first question in Part IV compares with NBR produced in each of the other countries you identified.

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

	Product from <u>United States</u> compared to product from <u>France</u>			Product from <u>United States</u> compared to product from <u>Mexico</u>				<u>Un</u> compa	oduct fron hited Sta hred to p from buth Kor	tes product
Factor	Superior	Comparable	Inferior	Superior	Comparable	Inferior		Superior	Comparable	Inferior
Availability										
Certification/Qualification										
Delivery terms										
Delivery time										
Discounts offered										
Meet customer specifications										
Minimum quantity requirements										
Packaging										
Payment terms										
Price <sup>1</sup>										
Price lock for > 30 days										
Product consistency										
Product range										
Quality meets industry standards										
Quality exceeds industry standards										
Reliability of supply										
Technical support/service										
U.S. transportation costs <sup>1</sup>										

prices/U.S. transportation costs than the second country.

# IV-5. **Continued.**

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

	Product from United States compared to product from nonsubject countries				Product from France compared to product from Mexico				Product from France compared to product from South Korea			
Factor	Superior	Comparable	Inferior		Superior	Comparable	Inferior		Superior	Comparable	Inferior	
Availability												
Certification/Qualification												
Delivery terms												
Delivery time												
Discounts offered												
Meet customer specifications												
Minimum quantity requirements												
Packaging												
Payment terms												
Price <sup>1</sup>												
Price lock for > 30 days												
Product consistency												
Product range												
Quality meets industry standards												
Quality exceeds industry standards												
Reliability of supply												
Technical support/service												
U.S. transportation costs <sup>1</sup>												
<sup>1</sup> A rating of 'superior" on price and U.S. transportation costs indicates that the first country generally has lower prices/U.S. transportation costs than the second country.												

#### IV-5. **Continued.**

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

	Product from France compared to product from nonsubject countries			Sor cor pro	duct fr uth Koi npared duct fr Mexico	<u>rea</u> I to om	Product from South Korea compared to product from nonsubject countries			
Factor	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior	
Availability										
Availability										
Certification/Qualification										
Delivery terms										
Delivery time										
Discounts offered										
Meet customer specifications										
Packaging										
Payment terms										
Price <sup>1</sup>										
Price lock for > 30 days										
Product consistency										
Product range										
Quality meets industry standards										
Quality exceeds industry standards										
Reliability of supply										
Technical support/service										
U.S. transportation costs <sup>1</sup>										

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

#### PART V.—ADDITIONAL INFORMATION

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

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

Hours	Dollars

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

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

# **HOW TO FILE YOUR QUESTIONNAIRE RESPONSE**

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://www.usitc.gov/investigations/701731/2022/acrylonitrile\_butadiene\_rubber\_france\_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.

• <u>Upload via Secure Drop Box</u>.—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> Pin: NRUB

• E-mail.—E-mail the MS Word questionnaire to craig.thomsen@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** <u>does not </u>**purchase this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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