

U.S. PRODUCERS' QUESTIONNAIRE

EMULSION STYRENE-BUTADIENE RUBBER FROM CZECHIA, ITALY, AND RUSSIA

This questionnaire must be received by the Commission by **June 6, 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 duty investigations concerning emulsion styrene-butadiene rubber ("ESBR") from Czechia, Italy, and Russia (Inv. Nos. 731-TA-1575-1577 (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 ESBR (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: **ESBR**)

CERTIFICATION

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

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background. —This proceeding was instituted in response to petitions filed effective November 15, 2021, by Lion Elastomers LLC, Port Neches, Texas. 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/emulsion_styrene_butadiene_rubber_czechia_italy/final.htm.

ESBR covered by these investigations is cold-polymerized emulsion styrene-butadiene rubber (ESBR). The scope of the investigations includes, but is not limited to, ESBR in primary forms, bales, granules, crumbs, pellets, powders, plates, sheets, strip, etc. ESBR consists of non-pigmented rubbers and oil-extended non-pigmented rubbers, both of which contain at least one percent of organic acids from the emulsion polymerization process.

ESBR is produced and sold in accordance with a generally accepted set of product specifications issued by the International Institute of Synthetic Rubber Producers (IISRP). The scope of the investigations covers grades of ESBR included in the IISRP 1500 and 1700 series of synthetic rubbers. The 1500 grades are light in color and are often described as “Clear” or “White Rubber.” The 1700 grades are oil-extended and thus darker in color, and are often called “Brown Rubber.”

Specifically excluded from the scope of these investigations are products which are manufactured by blending ESBR with other polymers, high styrene resin master batch, carbon black master batch (i.e., IISRP 1600 series and 1800 series) and latex (an intermediate product).

ESBR is currently imported under statistical reporting numbers 4002.19.0015 and 4002.19.0019 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

Reporting of information. —If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

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

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

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

D-GRIDS tool. —The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage (https://www.usitc.gov/trade_remedy/question.htm) 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 ESBR, 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
<input type="checkbox"/>	<input type="checkbox"/>

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

Country	Investigation type	Support	Oppose	Take no position
Czechia	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Italy	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Russia	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-5. **Ownership.** —Is your firm owned, in whole or in part, by any other firm?

☐ No

☐ Yes—List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

I-6. **Related importers/exporters.** —Does your firm have any related firms, either domestic or foreign, that are engaged in importing ESBR from Czechia, Italy, and/or Russia into the United States or that are engaged in exporting ESBR from Czechia, Italy, and/or Russia to the United States?

☐ No

☐ Yes—List the following information.

Firm name	Country	Affiliation

[illegible]

PART II.—TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Charles Cummings (202-708-1666, Charles.Cummings@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 ESBR 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>
<input type="checkbox"/>	Plant openings	
<input type="checkbox"/>	Plant closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or production curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Force majeure	
<input type="checkbox"/>	Other (e.g., technology)	

- II-2b. **COVID-19 pandemic.** —Since January 1, 2020, has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, production, employment, and shipments relating to ESBR? In your response, please discuss the duration and timing of these impacts as they relate to your firm's operations.

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

- 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 ESBR in the future?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-2d. **Natural disasters and similar disruptions.** —Have natural disasters and/or other similar disruptions (e.g., fires, explosions) since January 1, 2019, led to any shutdowns, stoppages, or curtailments in the functioning of your facilities, or your suppliers' facilities, so as to affect your firm's supply chain arrangements, production, and/or shipments?

No	Yes	If yes, describe these changes including a separate discussion of the (a) supply chain impact and (b) production and shipments impact. Include in this discussion an indication of the timing and duration or the impacts and whether and how your firm adapted to these impacts.
<input type="checkbox"/>	<input type="checkbox"/>	

II-3a. **Production using same machinery.**—Please report your firm's production of products using the same equipment, machinery, or employees as used to produce ESBR, 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			January-March	
	2019	2020	2021	2021	2022
Overall production capacity¹					
Production of:					
ESBR ²	0	0	0	0	0
Out-of-scope production. — Carbon black master batch (CBMB)					
High styrene resin master batch (HSRMB)					
Hot polymerized ESBR					
Solution styrene-butadiene rubber (SSBR)					
Other products ³					
Subtotal, out-of-scope production	0	0	0	0	0
Total production using same machinery or workers	0	0	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 ESBR will populate here once reported in question II-7.
³ 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 or production capacity.

Constraint (Check as many as appropriate)		Description (If checked, please describe the details, timing, and duration of the constraint(s); leave completely blank if not applicable/ not checked) If your firm checks multiple constraints, please specify to what degree each constraint was binding and in which periods each checked constraint was setting the effective limit to your firm's reported production capacity.
<input type="checkbox"/>	Processing bottleneck(s)	
<input type="checkbox"/>	Supply of labor force/skills	
<input type="checkbox"/>	Supply of material inputs	
<input type="checkbox"/>	Fuel or energy	
<input type="checkbox"/>	Storage capacity	
<input type="checkbox"/>	Logistics/transportation	
<input type="checkbox"/>	Other	

II-4. **Product shifting.**—

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

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

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

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

“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.
<input type="checkbox"/>	<input type="checkbox"/>	

II-6. **Foreign trade zones.** —

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

“Foreign trade zone” is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

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

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

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

- II-7. **Production, shipment, and inventory data.** —Report your firm's production capacity, production, shipments, and inventories related to the production of ESBR 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.

"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			January-March	
	2019	2020	2021	2021	2022
Average production capacity¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) (C)					
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			January-March	
	2019	2020	2021	2021	2022
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	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. **U.S. shipments by channels of distribution and product type.** — Report the quantity and value of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution and product type.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
U.S. shipments of:					
1500 series ESBR					
to Distributors					
Quantity (M)					
Value (N)					
to Tire manufacturers					
Quantity (O)					
Value (P)					
to Other end users ¹					
Quantity (Q)					
Value (R)					
1700 series ESBR					
to Distributors					
Quantity (S)					
Value (T)					
to Tire manufacturers					
Quantity (U)					
Value (V)					
to Other end users ²					
Quantity (W)					
Value (X)					
¹ Please identify the types of other end users to whom these shipments were made: _____.					
² Please identify the types of other end users to whom these shipments were made: _____.					

RECONCILIATION OF U.S. SHIPMENTS BY CHANNELS OF DISTRIBUTION AND PRODUCT TYPE. — Please ensure that the quantities and values reported for U.S. shipments by channels of distribution and product type (i.e., lines M through X) in each time period equal the quantities and values reported for U.S. shipments in II-7 (i.e., lines 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			January-March	
	2019	2020	2021	2021	2022
Quantity: M + O + Q + S + U + W – D – F – H = zero ("0"), if not revise.	0	0	0	0	0
Value: N + P + R + T + V + X – E – G – I = zero ("0"), if not revise.	0	0	0	0	0

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

Item	Calendar year 2021
	Share of the quantity (percent)
U.S. shipments in:	
Bales	
All other forms (i.e., granules, crumbs, pellets, powders, plates, sheets, and/or strips)	
Total (should sum to 100.0%)	0.0

- II-10. **U.S. shipments by production process.** —Report the quantity of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by production process in 2021.

Item	Calendar year 2021
	Quantity (in 1,000 pounds)
U.S. shipments:	
Aromatic extracts (e.g., TDAE, RAE) (Y)	
Bound styrene (Z)	
Alphamethyl styrene (AA)	
Aromatic oils (AB)	
Other ¹ (AC)	
¹ Please specify the production processes: _____.	

RECONCILIATION OF U.S. SHIPMENTS BY PRODUCTION PROCESS. —Please ensure that the quantities reported for U.S. shipments by production process (i.e., lines Y through AC) in 2021 equal the quantities reported for U.S. shipments in II-7 (i.e., lines D, F, and H) in 2021. If the calculated field below returns a value other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year
	2021
Quantity: Y + Z + AA+ AB + AC – D – F – H = zero ("0"), if not revise.	0

- II-11. **Monthly U.S. shipments.** — Report the quantities of your firm's monthly U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of ESBR from January 2019 through March 2022.

Month of shipment	Calendar year			
	2019	2020	2021	2022
	Quantity (in 1,000 pounds)			
January (AD)				
February (AE)				
March (AF)				
April (AG)				
May (AH)				
June (AI)				
July (AJ)				
August (AK)				
September (AL)				
October (AM)				
November (AN)				
December (AO)				
Total	0	0	0	0

RECONCILIATION OF MONTHLY U.S. SHIPMENTS. — The data reported for the monthly U.S. shipments in a year (i.e., lines AD through AO) should be equal to the U.S. shipments reported in II-7 (i.e., lines D, F, and H) for that same year and/or time period (i.e., January-March 2021 and January-March 2022). If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year			January-March	
	2019	2020	2021	2021	2022
AD + AE + AF + AG + AH + AI + AJ + AK + AL + AM + AN + AO – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

- II-12. **Employment data.** —Report your firm's employment-related data related to the production of ESBR and provide an explanation for any trends in these data.

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

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to March periods, calculate similarly and divide by 3.

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

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

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

Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
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 ESBR 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.
<input type="checkbox"/>	<input type="checkbox"/>	

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

(Quantity in 1,000 pounds)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
Purchases from U.S. importers¹ of ESBR from—					
Czechia					
Italy					
Russia					
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. **Purchases of imports from subject sources.** —If your firm reported purchases from U.S. importers of ESBR from Czechia, Italy, or Russia at any time since January 1, 2019, report those purchases by the individual importer of record and subject source.

Purchases of subject imports

Quantity (in 1,000 pounds)						
Importer of record	Subject source	Calendar year			January-March	
		2019	2020	2021	2021	2022

RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES. —Please ensure that the quantities reported for your firm's purchases of imports from subject sources reported in this question (i.e., "total purchases of imports from subject sources") in each time period equal the quantity reported for your firm's purchases from subject sources in each time period in the previous question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-March	
	2019	2020	2021	2021	2022
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0	0	0

- II-16. **Imports.** —Since January 1, 2019, has your firm imported ESBR?

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

- II-17. **Captive production use.** —Please report the quantity of your firm's internal consumption and/or transfers to related firms for the uses identified below. These data should reconcile with the quantities reported in question II-7 (lines F and H).

Quantity (in 1,000 pounds)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
Internal consumption or transfers to related firms. — Sold as is, i.e., as ESBR (merchandise was diverted back into the market for ESBR)					
Processed into downstream products ¹					
¹ Please identify these products: _____					

RECONCILIATION OF CAPTIVE PRODUCTION USE. —The sum of the data reported above should be equal to the sum of the data reported in lines F and H of question II-7 for all periods.

Reconciliation	Calendar year			January-March	
	2019	2020	2021	2021	2022
Internal consumption and transfers to related parties (lines F and H in II-7) reconciliation.	0	0	0	0	0
These data should reconcile with the quantities reported in question II-7 (lines F and H). If not, please revise.					

- II-18. **ESBR share contribution to downstream products.** —If your firm reported that your firm's ESBR was used in the production of downstream products as reported in question II-16, please provide the following data on the share that ESBR and other inputs account for the production of these downstream products.

Material inputs used in downstream products production	Share of <u>value/costs</u> (percent)	Share of the <u>quantity</u> (percent)
ESBR		
All other material inputs		
Total (should sum to 100.0%)	0.0	0.0

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

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PART III. —FINANCIAL INFORMATION

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

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

Name	
Title	
Email	
Telephone	

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

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

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

2. Does your firm prepare profit/loss statements for ESBR:
☐ 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 ESBR, 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.).

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- 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.

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- III-5. **Product listing.**— Please list the products your firm produced in the facilities in which your firm produced ESBR and provide the share of net sales accounted for by these products in 2021.

Products	Share of sales
ESBR	%
	%
	%
	%
	%

- III-6. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of ESBR 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.
<input type="checkbox"/>	<input type="checkbox"/>

- III-7. **Inputs from related suppliers detailed.**—Please identify the inputs used in the production of ESBR 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
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 ESBR) 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.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-9a. **Operations on ESBR (TOTAL MARKET).**—Report the revenue and related cost information requested below on the ESBR 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			January-March	
	2019	2020	2021	2021	2022
Net sales quantities: ²					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
Net sales values: ²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS): ³					
Butadiene					
Styrene					
Other raw materials					
Total raw material costs	0	0	0	0	0
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative expenses					
Operating income (loss)	0	0	0	0	0
Other expenses and income:					
Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	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.

- III-9b. **Operations on ESBR – U.S. commercial sales and exports only (OPEN MARKET).**—Report the revenue and related cost information requested below on the ESBR operations of your firm's U.S. establishment(s).¹ Include both domestic and export commercial sales of ESBR, but do not report resales of purchased ESBR. 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			January-March	
	2019	2020	2021	2021	2022
Net sales quantities: ²					
Commercial sales from III-9a	0	0	0	0	0
Net sales values: ²					
Commercial sales from III-9a	0	0	0	0	0
Cost of goods sold (COGS): ³					
Butadiene					
Styrene					
Other raw materials					
Total raw material costs	0	0	0	0	0
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative expenses					
Operating income (loss)	0	0	0	0	0
Other expenses and income:					
Interest expense					
All other expense items					
All other income items					
Net income or (loss) before income taxes	0	0	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.

- III-9c. **Financial data reconciliation.**—The calculable line items from question III-9a (i.e., total net sales quantities and values, total raw material costs, 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?

		<p>If no—If the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.</p> <p>Also, check signs accorded to the post operating income line items. The two expense line items should report positive numbers (i.e., expenses are positive, and incomes or reversals are negative in these lines – instances of the latter should be rare in these lines). The income line item should also, in most instances, be a positive number (i.e., income is positive, and expenses or reversals are negative in this line).</p> <p>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.</p>
Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	

- III-9d. **Raw material changes.**—What is the average number of days that occur between when your firm procures its primary raw materials (e.g., butadiene and styrene, or their upstream inputs) used in the production of ESBR and when those raw material costs get reflected in the cost of goods reported in III-9a or III-9b? ____ days. Please describe if this average differs significantly based on time period or specific raw material: ____.

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

Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
	Value (\$1,000)				
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

Nonrecurring item: In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a 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 questions III-9a/III-9b.

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

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

Value (in \$1,000)			
Item	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 ESBR.

Value (in \$1,000)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
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-9b, 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.
<input type="checkbox"/>	<input type="checkbox"/>	

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 year			January-March	
	2019	2020	2021	2021	2022
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	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	0	0

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

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

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

III-15. **Effects of imports on investment.**—Since January 1, 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 ESBR from Czechia, Italy, and Russia?

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

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

- III-16. **Effects of imports on growth and development.**—Since January 1, 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 ESBR from Czechia, Italy, and Russia?

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

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

- III-17. **Anticipated effects of imports.** —Does your firm anticipate any negative effects due to imports of ESBR from Czechia, Italy, and Russia?

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

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

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

- 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.

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PART IV.—PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Pamela Davis (202-205-2218, pamela.davis@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.— IISRP 1502 grade of ESBR in all forms

Product 2.— IISRP 1507 grade of ESBR in all forms

Product 3.— IISRP 1712 grade of ESBR in all forms

Product 4.— IISRP 1783 grade of ESBR in all forms

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-March 2022, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	Yes. —Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	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 of pounds) and **actual dollars** (not 1,000s).

(Quantity in pounds, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	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								
2022:								
January-March								

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:

Product 4:

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

IV-2d. **Quarterly conversion prices.**—Report the average quarterly conversion prices charged for all in-scope ESBR products since January 1, 2019 and provide an explanation for any trends.

Period of sales	Conversion price (dollars per pound)
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	
2022:	
January-March	
Explanation of trends:	

IV-2e. **Conversion price negotiations.**—

Does your firm negotiate conversion prices with customers?	Yes – Please answer quarterly or annually	No – Please continue to IV-2f
	<input type="checkbox"/>	<input type="checkbox"/>

If yes, are such conversion prices negotiated quarterly or annually?	Quarterly	Annually
	<input type="checkbox"/>	<input type="checkbox"/>

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

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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 ESBR (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

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

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

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

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

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

IV-6. **Contract versus spot.**—Approximately what share of your firm's sales of its U.S.-produced ESBR 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 ESBR (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

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

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 ESBR?

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 ESBR 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 ESBR since January 1, 2019 (check all that apply)?

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

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

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

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

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

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

IV-14. **Demand trends.**—Indicate how demand within the United States and outside of the United States (if known) for ESBR 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	Fluctuate with no clear trend	Explanation and factors
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

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

IV-16. Conditions of competition. —

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

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

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

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

IV-17. Supply constraints. —

- (a) Has your firm refused, declined, or been unable to supply ESBR at any time between January 1, 2019, and November 15, 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, etc.)?

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

- (b) Has your firm experienced any supply constraints since the petition was filed on November 15, 2021?

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

IV-18. **Raw materials.**—

(a) How have ESBR 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 ESBR.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) Has your firm had difficulties with sourcing or been unable to source raw materials used in the production of ESBR since January 1, 2019?

No	Yes	If yes, please identify the material(s) and describe, including the timing and duration of the difficulties or inability to source ESBR raw materials.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-19. **Source Interchangeability.**—Is ESBR 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* interchangeableF = the products are *frequently* interchangeableS = the products are *sometimes* interchangeableN = the products are *never* interchangeableO = *no familiarity* with products from a specified country-pair

Country-pair	Czechia	Italy	Russia	Other countries
United States				
Czechia				
Italy				
Russia				
For any country-pair producing ESBR 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. **Product Interchangeability.**— Are the different types of ESBR interchangeable (i.e., can they be physically used in the same applications)?

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

A = the products from a specified process 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 process-pair

Process-pair	Bound styrene	Alphamethyl styrene	Aromatic oils	Other
Aromatic extracts (e.g. TDAE, RAE)				
Bound styrene				
Alphamethyl styrene				
Aromatic oils				

For any production processes, please describe:

For any process-pair for which ESBR which is *sometimes* or *never* interchangeable, please identify the process-pair and explain the factors that limit or preclude interchangeable use:

IV-21. **Factors other than price.**—Are differences other than price (e.g., quality, availability, reliability of supply, transportation network, product range, technical support, *etc.*) between ESBR 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	Czechia	Italy	Russia	Other countries
United States				
Czechia				
Italy				
Russia				

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

IV-22. **Customer identification.**—List the names and contact information for your firm's 10 largest U.S. customers for ESBR since January 1, 2019. Indicate the share of the quantity of your firm's U.S. shipments of ESBR 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 ESBR from Czechia, Italy, or Russia, did your firm:

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

- (b) **Lost sales.**—Since January 1, 2019: Did your firm lose sales of ESBR to imports of this product from Czechia, Italy, or Russia?

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

- 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.

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/emulsion_styrene_butadiene_rubber_czechia_italy/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: ESBR

- **E-mail.** —E-mail the MS Word questionnaire to Charles.Cummings@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).