

## U.S. IMPORTERS' QUESTIONNAIRE

### CHLORINATED ISOCYANURATES FROM CHINA AND SPAIN

This questionnaire must be received by the Commission by **July 8, 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 review of the antidumping duty orders concerning chlorinated isocyanurates ("chlorinated isos") from China and Spain (Inv. Nos. 731-TA-1082-1083 (Third Review)). 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 imported chlorinated isos (as defined on the next page) *from any country* at any time since January 1, 2016?

☐ **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 Commission **Drop Box** by clicking on the following link:

<https://dropbox.usitc.gov/oinv/>. (PIN: **ISOS**)

#### 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 investigations or reviews 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.***--On June 24, 2005, the Department of Commerce ("Commerce") issued antidumping duty orders on imports of chlorinated isos from China and Spain. On October 1, 2021, the Commission instituted a review pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the order will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the order. Questionnaires and other information pertinent to this proceeding are available at [https://usitc.gov/investigations/701731/2021/chlorinated\\_isocyanurates\\_china\\_and\\_spain/third\\_review\\_full.htm](https://usitc.gov/investigations/701731/2021/chlorinated_isocyanurates_china_and_spain/third_review_full.htm).

***Chlorinated isos*** covered by these investigations are derivatives of cyanuric acid, described as chlorinated s-triazine triones. There are three primary chemical compositions of chlorinated isos: (1) trichloroisocyanuric acid ( $\text{Cl}_3(\text{NCO})_3$ ); (2) sodium dichloroisocyanurate (dehydrate) ( $\text{NaCl}_2(\text{NCO})_3(2\text{H}_2\text{O})$ ); and (3) sodium dichloroisocyanurate (anhydrous) ( $\text{NaCl}_2(\text{NCO})_3$ ). The AD Orders cover all chlorinated isos.

Chlorinated isos are currently imported under statistical reporting numbers 2933.69.6015, 2933.69.6021, and 2933.69.6050 of the Harmonized Tariff Schedule of the United States (HTSUS).<sup>1</sup> Chlorinated isos may also be imported under HTS subheadings 3808.59.40, 3808.59.50, and 3808.94.50. 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, purchaser and/or foreign producer 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

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<sup>1</sup> The tariff classification 2933.69.6015 covers sodium dichloroisocyanurates (anhydrous and dehydrate forms) and trichloroisocyanuric acid. The tariff classifications 2933.69.6021 and 2933.69.6050 represent basket categories that include chlorinated isos and other compounds including unfused triazine rings.

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.

**Valid number error messages.**--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Keysha Martinez (202-205-2136, [Keysha.Martinez@usitc.gov](mailto:Keysha.Martinez@usitc.gov)).

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

I-1. **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 40 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-2a. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire.

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

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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. **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-4. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing chlorinated isos into the United States or that are engaged in exporting chlorinated isos to the United States?

**“Related firm”** –A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-5. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of chlorinated isos?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-6. **Importing operations.**--Please indicate the nature of your firm's importing operations on chlorinated isos. More than one answer may be applicable.

Importer of record	Takes title to the imported product(s)	Consignee of the imported products(s)	Customs broker or freight forwarder
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-7. **Consignees.**--If your firm is an importer of record of chlorinated isos but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

- I-8. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters chlorinated isos into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports chlorinated isos under the TIB (temporary importation under bond) program.

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

**“Bonded warehouse”** is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

**“Temporary Importation under Bond (“TIB”) program”** is a procedure whereby, imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule (HTS).

Item	No	Yes
Foreign trade zones	<input type="checkbox"/>	<input type="checkbox"/>
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>
Temporary importation under bond	<input type="checkbox"/>	<input type="checkbox"/>

- I-9. **Other trade actions.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

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

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

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

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

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of chlorinated isos since January 1, 2016.

<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"/>	Office/warehouse openings	
<input type="checkbox"/>	Office/warehouse closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or importation curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Other (e.g., technology)	



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

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

- II -2c. **Anticipated changes in operations.**—Does your firm anticipate any changes in in the character of its operations or organization relating to the importation of chlorinated isos in the future?

<b>No</b>	<b>Yes</b>	<b>If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

- II-3. **Arranged imports.**--Has your firm imported or arranged for the importation of chlorinated isos for delivery after **March 31, 2022**?

**"Arranged imports"** are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

☐ No ☐ Yes—Fill out the table below.

Quantity ( <i>in short tons</i> )				
Period/Source	Apr-Jun 2022	Jul-Sept 2022	Oct-Dec 2022	Jan-Mar 2023
China				
Spain				
All other sources				

- II-4. **TABLETING of imported chlorinated isos.**—Since January 1, 2016, has your firm tableted chlorinated isos it has imported using its own tableting equipment in the United States?

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

- II-5. **Tolling.**--Since January 1, 2016, has your firm been involved in a toll agreement regarding the tableting of chlorinated isos imported by your firm?

**“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.

<b>No</b>	<b>Yes</b>	<b>If yes--Please describe the toll arrangement(s) and name the firm(s) involved.</b>
<input type="checkbox"/>	<input type="checkbox"/>	
		<b>If your firm was the toller in this relationship and operated tableting machinery in the United States--<u>COMPLETE AND RETURN A U.S. PRODUCERS' QUESTIONNAIRE</u></b>

- II-6. **Reasons for importing if producer.**--If your firm also produces chlorinated isos in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

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**Definitions**

***“Imports”*** –Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty).

***“Import quantities”*** –Quantities reported should be net of returns.

***“Import values”*** –Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

***“U.S. commercial 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 (e.g., for use in tableting operations conducted in the United States, or in an end use application). 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-7a. **U.S. imports from China.**--Report your firm's imports and your firm's shipments and inventories of chlorinated isos imported from China during the specified periods.

## China

Quantity ( <i>in short tons</i> ), value ( <i>in \$1,000</i> )					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
<b>Beginning-of-period inventories</b> ( <i>quantity</i> ) (A)					
<b>Imports:</b> <sup>1</sup> <i>Quantity</i> (B)					
<i>Value</i> (C)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> <i>Quantity</i> (D)					
<i>Value</i> (E)					
<b>Internal consumption:</b> <sup>2</sup> <i>Quantity</i> (F)					
<i>Value</i> <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>2</sup> <i>Quantity</i> (H)					
<i>Value</i> <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>3</sup> <i>Quantity</i> (J)					
<i>Value</i> (K)					
<b>End-of-period inventories</b> ( <i>quantity</i> ) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

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

II-7a. **U.S. imports from China.**—Continued

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.**—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 A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely 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
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-7b. **Channels of distribution : CHINA**— Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of chlorinated isos imports from China by channel of distribution in the specified period.

## China

Quantity (in short tons)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
<b>Channels of distribution:</b>					
U.S. shipments-- to distributors (M)					
to repackers/tableters (N)					
to retailers (O)					
to industrial markets (P)					

**RECONCILIATION OF CHANNELS.**—Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, O, and P) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, and H) 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
M + N + O + P – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

- II-7c. **Historical U.S. imports: CHINA.** --Report the quantity and value your firm's imports of chlorinated isos imported from China during the specified periods.

## China

Quantity (in short tons), value (in \$1,000)			
Item	2016	2017	2018
<b>U.S. imports:</b>			
Quantity			
Value			

- II-7d. **U.S. shipments by type: CHINA.** --Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by product type in 2021.

*Note.*—U.S. imports of granular/powder chlorinated isos that are tableted in the United States should be classified as a U.S. shipment (internal consumption) of granular/powder chlorinated isos.

## China

Quantity (in short tons), value (in \$1,000)	
Item	Calendar year
	2021
<b>U.S. shipments of--</b>	
Granular/powder chlorinated isos:	
Quantity (Q)	
Value (R)	
Tableted chlorinated isos:	
Quantity (S)	
Value (T)	

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.** --Please ensure that the quantities and values reported for U.S. shipments by type (i.e., lines Q through T) in 2021 equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in 2021. 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
	2021
<b>Quantity:</b> $Q + S - D - F - H = \text{zero ("0")}$ , if not revise.	0
<b>Value:</b> $R + T - E - G - I = \text{zero ("0")}$ , if not revise.	0

II-8a. **Chlorinated isos imports from Spain.**--Report your firm's imports and your firm's shipments and inventories of chlorinated isos imported from Spain during the specified periods.

## Spain

Quantity (in short tons), value (in \$1,000)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Quantity (B)					
Value (C)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>3</sup> Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

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

II-8a. **Chlorinated isos imports from Spain.**—Continued

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.**—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 A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely 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
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-8b. **Channels of distribution: SPAIN**— Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of chlorinated isos imports from Spain by channel of distribution in the specified period.

## Spain

Quantity (in short tons)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
<b>Channels of distribution:</b>					
U.S. shipments-- to distributors (M)					
to repackers/tableters (N)					
to retailers (O)					
to industrial markets (P)					

**RECONCILIATION OF CHANNELS.**—Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, O, and P) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, and H) 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
M + N + O + P – D – F – H = zero ("0"), if not revise.	0	0	0	0	0



- II-8c. **Historical U.S. imports of chlorinated isos: SPAIN.** --Report the quantity and value your firm's imports of chlorinated isos imported from Spain during the specified periods.

## Spain

Quantity (in short tons), value (in \$1,000)			
Item	2016	2017	2018
<b>U.S. imports:</b>			
Quantity			
Value			

- II-8d. **U.S. shipments by type: SPAIN.** --Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Spain by product type in 2021.

*Note.*—U.S. imports of granular/powder chlorinated isos that are tableted in the United States should be classified as a U.S. shipment (internal consumption) of granular/powder chlorinated isos.

## Spain

Quantity (in short tons), value (in \$1,000)	
Item	Calendar year
	2021
<b>U.S. shipments of--</b>	
Granular/powder chlorinated isos:	
Quantity (Q)	
Value (R)	
Tableted chlorinated isos:	
Quantity (S)	
Value (T)	

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.** --Please ensure that the quantities and values reported for U.S. shipments by type (i.e., lines Q through T) in 2021 equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in 2021. 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
	2021
<b>Quantity:</b> $Q + S - D - F - H = \text{zero ("0")}$ , if not revise.	0
<b>Value:</b> $R + T - E - G - I = \text{zero ("0")}$ , if not revise.	0

- II-9a. **Chlorinated isos imports from All other sources.**--Report your firm's imports and your firm's shipments and inventories of chlorinated isos imported from all other sources (i.e., sources other than China or Spain) during the specified periods.

## All other sources

(List sources: \_\_\_\_\_)

Quantity (in short tons), value (in \$1,000)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Quantity (B)					
Value (C)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (D)					
Value (E)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:</b> <sup>3</sup> Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

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

II-9a. **Chlorinated isos imports from all other sources.**—Continued

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.**—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 A), plus imports (i.e., line B), 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 actually reflect your firm's records; and also provide any likely 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
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-9b. **Channels of distribution: ALL OTHER SOURCES**— Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of chlorinated isos imports from all other sources by channel of distribution in the specified period.

## All other sources

Quantity (in short tons)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
<b>Channels of distribution:</b>					
U.S. shipments-- to distributors (M)					
to repackers/tableters (N)					
to retailers (O)					
to industrial markets (P)					

**RECONCILIATION OF CHANNELS.**—Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, O, and P) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, and H) 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
M + N + O + P – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

- II-9c. **Historical U.S. imports of chlorinated isos: ALL OTHER SOURCES.** --Report the quantity and value your firm's imports of chlorinated isos imported from all other sources during the specified periods.

## All other sources

Quantity (in short tons), value (in \$1,000)			
Item	2016	2017	2018
<b>U.S. imports:</b>			
Quantity			
Value			

- II-9d. **U.S. shipments by type: ALL OTHER SOURCES.** --Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by product type in 2021.

*Note.*—U.S. imports of granular/powder chlorinated isos that are tableted in the United States should be classified as a U.S. shipment (internal consumption) of granular/powder chlorinated isos.

## All other sources

Quantity (in short tons), value (in \$1,000)	
Item	Calendar year
	2021
<b>U.S. shipments of--</b>	
Granular/powder chlorinated isos:	
Quantity (Q)	
Value (R)	
Tableted chlorinated isos:	
Quantity (S)	
Value (T)	

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.** --Please ensure that the quantities and values reported for U.S. shipments by type (i.e., lines Q through T) in 2021 equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in 2021. 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
	2021
<b>Quantity:</b> $Q + S - D - F - H = \text{zero ("0")}$ , if not revise.	0
<b>Value:</b> $R + T - E - G - I = \text{zero ("0")}$ , if not revise.	0

**For questions II-10 and II-11, if your firm's response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.**

- II-10. **Effect of order(s).**--Describe the significance of the existing antidumping duty orders covering imports of chlorinated isos from China and/or Spain in terms of its effect on your firm's imports, U.S. shipments of imports, and inventories. You may wish to compare your firm's operations before and after the imposition of the order(s).

--

- II-11. **Likely impact of revocation.** --Would your firm anticipate any changes in the character of its operations or organization, including its imports, U.S. shipments of imports, or inventories of chlorinated isos in the future if the antidumping duty orders on chlorinated isos from China and/or Spain were to be revoked?

<b>No</b>	<b>Yes</b>	<b>If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

- II-12. **Transfers to related firms.**--If your firm reported transfers to related firms in any of the data tables in Part II, 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) and whether the transfers were priced at market value or by a non-market formula.

--

- II-13. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

**PART III.--PRICING AND MARKET FACTORS**

Further information on this part of the questionnaire can be obtained from Kamron Daugherty (202-205-3168, [Kamron.Daugherty@usitc.gov](mailto:Kamron.Daugherty@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	

**PRICE DATA**

- III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers of the following products your firm imported from China and/or Spain:

**Product 1.**--Granular trichloroisocyanuric acid with approximately 90 percent available chlorine content (similar to ACL®90 or CDB®), sold in bulk packages equal to or greater than 1,000 pounds and less than or equal to 2,205 pounds.

**Product 2.**--Granular sodium dichloroisocyanuric (dihydrate) with approximately 56 percent available chlorine content (similar to ACL®56 or CDB®56), sold in bulk packages equal to or greater than 1,000 pounds and less than or equal to 2,205 pounds, sold for repackaging for pool treatment use.

**Product 3.**-- 3-inch or comparable trichlor tablets, with tablet volume of 6 to 8 ounces, in 35-55 pound containers for tableting conducted outside of the United States.

**Product 4.**-- Blended 3-inch or comparable tablets, with tablet volume of 6 to 8 ounces, with approximately 85 to 90 percent available chlorine content, in 24-26 pound containers for tableting conducted outside of the United States.

**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).**

- (a) During January 2019-March 2022, did your firm import from China and/or Spain and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

III-2b. **Price data (China).**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from China and sold by your firm.

## China

**Report data in actual pounds (not short tons) 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
<b>2019:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2020:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:

III-2c. **Price data (Spain).**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from Spain and sold by your firm.

## Spain

**Report data in actual pounds (not short tons) 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
<b>2019:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2020:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:



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

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000) and 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:	

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

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

--

III-3. This question requests quarterly quantity and landed-duty paid value data for your firm's imports of the products defined above (p. 11) for internal consumption or repackaging from China, and Spain since January 1, 2019.

During January 2019–March 2022, did your firm import any of the products listed on page 28 from China and/or Spain for internal consumption or repackaging?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following table(s) as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question III-4.

III-3a. **Imports for internal use, repackaging, or retail sale: China.**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from China and used by your own firm or repackaged (including into tablet form).

Please note that values should be landed, duty-paid (LDP) and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

## China

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

(Quantity in pounds, value in dollars)								
Period of importation	Product 1		Product 2		Product 3		Product 4	
	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value
<b>2019:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2020:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								

<sup>1</sup> LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). See "Import values" definition in Part II (Trade and Related Information – Definitions).

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

**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:

III-3b. **Imports for internal use, repackaging, or retail sale: Spain.**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from Spain and used by your own firm or repackaged (including into tablet form).

Please note that values should be landed, duty-paid (LDP) and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

## Spain

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

(Quantity in pounds, value in dollars)								
Period of importation	Product 1		Product 2		Product 3		Product 4	
	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value
<b>2019:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2020:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								

<sup>1</sup> LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). See "Import values" definition in Part II (Trade and Related Information – Definitions).

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

**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:

**The following questions ask about the costs/benefits (not included in the LDP values reported above) that factor into your firm's decision to import chlorinated isos rather than purchase from a U.S. producer or importer of chlorinated isos.**

**III-3c. Additional costs for your firm's imports of chlorinated isos for your firm's internal use or repackaging.—**

- i. Did your firm incur any additional costs by importing chlorinated isos rather than purchasing from a U.S. producer or importer (e.g., logistical or supply chain management costs, warehousing/inventory carrying costs, insurance or other risk management fees, demurrage fees, indirect and overseas costs)?

☐ No                      ☐ Yes—Please answer parts ii, iii, and iv.

- ii. Please provide an estimate of the total additional cost incurred (as a percentage compared to LDP value) when importing chlorinated isos rather than purchasing from a U.S. producer or importer. (Report only the portion that is related to your firm's importing activities, either directly or indirectly, and not already included in the LDP value. Do NOT include any costs that also would be incurred if your firm purchased the product from a U.S. producer or importer.) \_\_\_\_\_ percent compared to LDP value.

- iii. Please identify and explain the specific additional costs incurred by your firm and estimate each cost (in percent) compared to the cost of importing. (Only report costs and the portion of each cost that was related to your firm's importing activities for chlorinated isos, either directly or indirectly, and that are not already included in the LDP value. Do NOT report costs that your firm would incur when purchasing chlorinated isos from a U.S. producer or importer.)

<b>Costs</b>	<b>Estimated percentage compared to LDP value (percent)</b>	<b>Explanation</b>
	%	
	%	
	%	
	%	

- iv. Briefly describe how your firm's additional costs (beyond the purchase price) by importing chlorinated isos directly compare with the additional costs your firm incurs when purchasing from a U.S. producer or U.S. importer.

III-3d. **Decision basis.**—To which source(s) does your firm compare costs in determining whether or not to import chlorinated isos? Check all that apply.

U.S. importers	U.S. producers	Neither U.S. importers nor U.S. producers
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-3e. **Benefits of importing chlorinated isos.**

- i. Briefly identify the benefits of importing chlorinated isos instead of purchasing chlorinated isos from a U.S. importer or from a U.S. producer.

--

- ii. Is it your firm's experience that the chlorinated isos your firm imported from China and/or Spain are priced lower than they would be if your firm purchased from a U.S. importer or U.S. producer?

Imports are priced lower when	No	Yes (If yes to either, please answer parts iii and iv.)
Not including the additional costs above	<input type="checkbox"/>	<input type="checkbox"/>
Including the additional costs above	<input type="checkbox"/>	<input type="checkbox"/>

- iii. Please estimate your firm's savings by importing chlorinated isos instead of purchasing from a U.S. producer or U.S. importer since January 1, 2019 (as a percent of the purchase price from the U.S. importer or U.S. producer). For your estimate, compare the price of purchasing from a U.S. importer or U.S. producer to the cost of direct imports (including the additional costs described above in III-3b).

Factors	Estimated savings (percent of purchase price from U.S. importer/producer)
U.S. producer	%
U.S. importer	%

- iv. What methods or experience did you base the estimates in III-3eiii (i.e. based on previous transactions with U.S. producers and/or U.S. importers, market research, etc.) Check all that apply.

Reported estimates in III-3eiii based on	✓ if Yes
Previous company transactions	<input type="checkbox"/>
Market research	<input type="checkbox"/>
Other – Please explain	<input type="checkbox"/>

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of these data, as Commission staff may contact your firm regarding questions. 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.*

III-4. **Price setting.**--How does your firm determine the prices that it charges for sales of chlorinated isos (*check all that apply*)?

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

III-5. **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"/>	

III-6. **Pricing terms.**--On what basis are your firm's prices of imported chlorinated isos from China and/or Spain usually quoted? (*check one*)

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

- III-7. **Contract versus spot.**--Approximately what share of your firm's sales of chlorinated isos imported from China and/or Spain in 2021 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

	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 your 2021 sales	%	%	%	%	0.0 %

- III-8. **Contract provisions.**— Please fill out the table regarding your firm's typical sales contracts for chlorinated isos imported from China and/or Spain (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

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



- III-9. **Lead times.**--What is your firm's share of sales of chlorinated isos imported from China and/or Spain 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 chlorinated isos?

Source	Share of 2021 sales	Lead time (average number of days)
From inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

- III-10. **Shipping information.**--

- (a) Who generally arranges the transportation to your firm's customers' locations?  
☐ Your firm   ☐ Purchaser *(check one)*
- (b) When your firm sells chlorinated isos imported from China and/or Spain, from where is it shipped?  
☐ Point of importation   ☐ Storage facility *(check one)*
- (c) Indicate the approximate percentage of your sales of chlorinated isos imported from China and/or Spain that are delivered the following distances from your firm's U.S. point of shipment.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total</b> (should sum to 100.0%)	0.0 %

- III-11. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold chlorinated isos imported from subject countries since January 1, 2016 (check all that apply)?

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

- III-12. **Inland transportation costs.**—What is the approximate percentage of the cost of chlorinated isos imported from China and/or Spain that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent.

- III-13. **End uses.**--Have there been any changes in the end uses of chlorinated isos since January 1, 2016? Do you anticipate any future changes?

Changes in end uses	No	Yes	Explain
Changes since January 1, 2016	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

- III-14. **Substitutes.**--Have there been any changes in the number or types of products that can be substituted for chlorinated isos since January 1, 2016? Do you anticipate any future changes?

Changes in substitutes	No	Yes	Explain
Changes since January 1, 2016	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

- III-15. **Availability of supply.**--Has the availability of chlorinated isos in the U.S. market changed since January 1, 2016? Do you anticipate any future changes?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
<b>Changes since January 1, 2016:</b>			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from China and/or Spain	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Anticipated changes:</b>			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from China and/or Spain	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

- III-16. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for chlorinated isos has changed since January 1, 2016, and how you anticipate demand will change in the future. Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
<b>Demand since January 1, 2016</b>					
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"/>	
<b>Anticipated future demand</b>					
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"/>	

III-17. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of chlorinated isos since January 1, 2016? Do you anticipate any future changes?

<b>Changes in product range, product mix, or marketing</b>	<b>No</b>	<b>Yes</b>	<b>Explain</b>
Changes since January 1, 2016	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Conditions of competition.**--

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

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

(b) If yes, have there been any changes in the business cycles or conditions of competition for chlorinated isos since January 1, 2016?

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

III-19. **Supply constraints.**--Has your firm refused, declined, or been unable to supply chlorinated isos since January 1, 2016 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

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

III-20. **Raw materials.**-- Indicate how chlorinated isos raw material prices have changed since January 1, 2016, and how you expect they will change in the future.

Raw materials prices	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 chlorinated isos.
Changes since January 1, 2016	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-21. **Impact of section 301 tariffs.**—Did the imposition of tariffs on Chinese origin products under section 301 have an impact on the chlorinated isos market in the United States

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

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how the imposition of tariffs under section 301 affected each factor of the chlorinated isos market in the United States.
Supply of U.S.-produced chlorinated isos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of chlorinated isos imported from China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of chlorinated isos imported from other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for chlorinated isos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall U.S. demand for chlorinated isos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for chlorinated isos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-22. **Price comparisons.**--Please compare market prices of chlorinated isos in U.S. and non-U.S. markets if known. Provide information as to time periods and regions for any price comparisons.

--

III-23. **Market studies.**--Please provide as a separate attachment to this request any studies, surveys, etc. that you are aware of that quantify and/or otherwise discuss chlorinated isos supply (including production capacity and capacity utilization) and demand in (1) the United States, (2) each of the other major producing/consuming countries, including China and/or Spain, and (3) the world as a whole. Of particular interest is such data from 2016 to the present and forecasts for the future.

III-24. **Interchangeability.**--Is chlorinated isos produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	Spain	Other countries
United States			
China			
Spain			
For any country-pair producing chlorinated isos that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:			

- III-25. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between chlorinated isos 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	China	Spain	Other countries
United States			
China			
Spain			

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

- III-26. **Role of section 301 tariffs.**-- Did the tariffs on Chinese-origin products under section 301, or changes in these tariffs, have an impact on the chlorinated isos market in the United States, including any effects on chlorinated isos cost, price, supply, and/or demand, since January 1, 2016?

Yes	No	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If yes, please describe the impact on cost, price, supply, and/or demand, and include the timing of such impacts.

--

- III-27. **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.

--

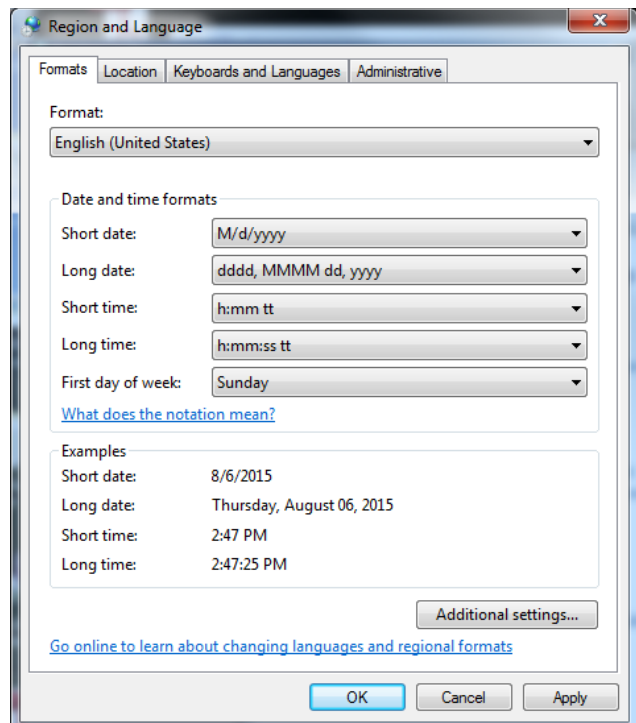
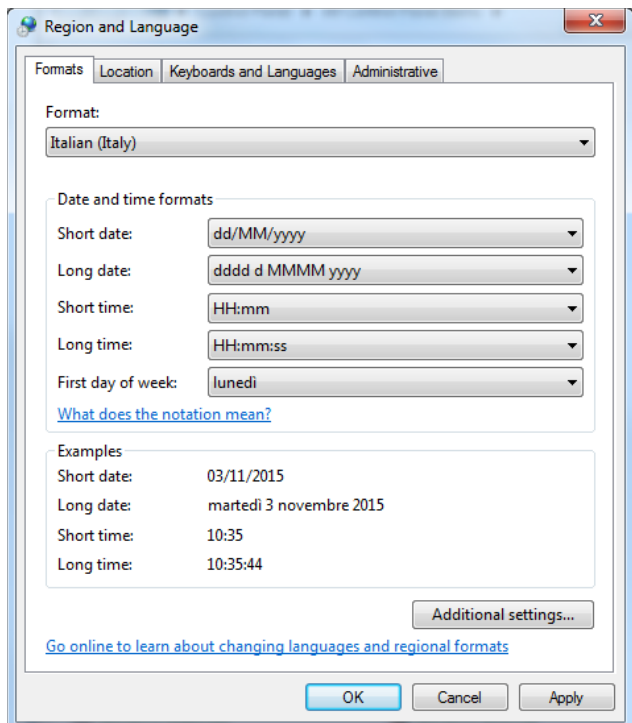
**Correcting Valid number error messages.**--If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. This issues stem from your computer number formatting setting (e.g., not the MS Word document itself, but the computer from which you are opening up the document). In the United States commas (,) delineate multiples of 1000 and periods (.) delineate fractions less than one. Many EU countries use the reverse where multiples of 1000 are delineated with periods (.) and fractions less than one are delineated with commas (,). The U.S. International Trade Commission's questionnaires are set-up in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU number formatting, we believe this may cause this issue.

The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

To temporarily change your computer's number settings to U.S. settings, please do the following (for Microsoft Windows Operating system):

- START
- Control Panel
- Region and Language (under Clock, Language, and Region category)
- Format tab
- Change the Format from your existing one (e.g. "Italian (Italy)") to "English (United States)" (see screen shots below)

When you do this the number "twelve million dollars and thirty-five cents" would change from \$12.000.000,35 (Italy format) to \$12,000,000.35 (U.S. format), and then there will be no conflict with the questionnaire. When you finish reporting the data then you can close the questionnaire and switch back to Italy settings.





## HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at:

[https://usitc.gov/investigations/701731/2021/chlorinated\\_isocyanurates\\_china\\_and\\_spain/third\\_review\\_full.htm](https://usitc.gov/investigations/701731/2021/chlorinated_isocyanurates_china_and_spain/third_review_full.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:** ISOS

- **E-mail.**—E-mail the MS Word questionnaire to [Keysha.Martinez@usitc.gov](mailto:Keysha.Martinez@usitc.gov); include a scanned copy of the signed certification page (page 1). *Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure drop-box system and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm’s nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.*

**If your firm does not import 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 (202-205-1802). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.