

U.S. PRODUCERS' QUESTIONNAIRE

STEEL NAILS FROM INDIA, OMAN, SRI LANKA, THAILAND, AND TURKEY

This questionnaire must be received by the Commission by **July 11, 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 countervailing duty and antidumping investigations concerning steel nails from India, Oman, Sri Lanka, Thailand, and Turkey (Inv. Nos. 701-TA-673-677 and 731-TA-1580-1583 (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 steel nails (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: NAIL)

CERTIFICATION

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

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background.-- This proceeding was instituted in response to a petition filed on December 30, 2021, by Mid Continent Steel & Wire, Inc., Poplar Bluff, Missouri. Countervailing and/or 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 subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2021/steel_nails_india_oman_sri_lanka_thailand_and/pr_eliminary.htm.

Steel nails covered by these investigations are “certain steel nails having a nominal shaft or shank length not exceeding 12 inches. Certain steel nails include, but are not limited to, nails made from round wire and nails that are cut from flat-rolled steel or long-rolled flat steel bars.

Certain steel nails may be of one piece construction or constructed of two or more pieces. Examples of nails constructed of two or more pieces include, but are not limited to, anchors comprised of an anchor body made of zinc or nylon and a steel pin or a steel nail; crimp drive anchors; split-drive anchors, and strike pin anchors. Also included in the scope are anchors of one piece construction.

Certain steel nails may be produced from any type of steel, and may have any type of surface finish, head type, shank, point type and shaft diameter. Finishes include, but are not limited to, coating in vinyl, zinc (galvanized, including but not limited to electroplating or hot dipping one or more times), phosphate, cement, and paint. Certain steel nails may have one or more surface finishes. Head styles include, but are not limited to, flat, projection, cupped, oval, brad, headless, double, countersunk, and sinker. Shank or shaft styles include, but are not limited to, smooth, barbed, screw threaded, ring shank and fluted.

Screw-threaded nails subject to this investigation are driven using direct force and not by turning the nail using a tool that engages with the head. Point styles include, but are not limited to, diamond, needle, chisel, and blunt or no point. Certain steel nails may be sold in bulk, or they may be collated in any manner using any material.

Excluded from the scope are certain steel nails packaged in combination with one or more nonsubject articles, if the total number of nails of all types, in aggregate regardless of size, is less than 25. If packaged in combination with one or more non-subject articles, certain steel nails remain subject merchandise if the total number of nails of all types, in aggregate regardless of size, is equal to or greater than 25, unless otherwise excluded based on the other exclusions below.

Also excluded from the scope are certain steel nails with a nominal shaft or shank length of one inch or less that are a component of an unassembled article, where the total number of nails is sixty (60) or less, and the imported unassembled article falls into one of the following eight groupings: (1) Builders' joinery and carpentry of wood that are classifiable as windows, Frenchwindows and their frames; (2) builders' joinery and carpentry of wood that are classifiable as doors and their frames and thresholds; (3) swivel seats with variable height adjustment; (4) seats that are convertible into beds (with the exception of those classifiable as garden seats or camping equipment); (5) seats of cane, osier, bamboo or similar materials; (6) other seats with wooden frames (with the exception of seats of a kind used for aircraft or motor vehicles); (7) furniture (other than seats) of wood (with the exception of (i) medical, surgical, dental or veterinary furniture; and (ii) barbers' chairs and similar chairs, having rotating as well as both reclining and elevating movements); or (8) furniture (other than seats) of materials other than wood, metal, or plastics (e.g., furniture of cane, osier, bamboo or similar materials). The aforementioned

imported unassembled articles are currently classified under the following Harmonized Tariff Schedule of the United States (HTSUS) subheadings: 4418.10, 4418.20, 9401.30, 9401.40, 9401.51, 9401.59, 9401.61, 9401.69, 9403.30, 9403.40, 9403.50, 9403.60, 9403.81 or 9403.89.

Also excluded from the scope of this investigation are nails suitable for use in powder-actuated hand tools, whether or not threaded, which are currently classified under HTSUS subheadings 7317.00.2000 and 7317.00.3000.

Also excluded from the scope of this investigation are nails suitable for use in gas-actuated hand tools. These nails have a case hardness greater than or equal to 50 on the Rockwell Hardness C scale (HRC), a carbon content greater than or equal to 0.5 percent, a round head, a secondary reduced-diameter raised head section, a centered shank, and a smooth symmetrical point.

Also excluded from the scope of this investigation are corrugated nails. A corrugated nail is made up of a small strip of corrugated steel with sharp points on one side.

Also excluded from the scope of this investigation are thumb tacks, which are currently classified under HTSUS subheading 7317.00.1000.

Also excluded from the scope are decorative or upholstery tacks.

Certain steel nails subject to this investigation are currently classified under HTSUS subheadings 7317.00.5501, 7317.00.5502, 7317.00.5503, 7317.00.5505, 7317.00.5507, 7317.00.5508, 7317.00.5511, 7317.00.5518, 7317.00.5519, 7317.00.5520, 7317.00.5530, 7317.00.5540, 7317.00.5550, 7317.00.5560, 7317.00.5570, 7317.00.5580, 7317.00.5590, 7317.00.6530, 7317.00.6560 and 7317.00.7500. Certain steel nails subject to this investigation also may be classified under HTSUS subheadings 7318.15.5090, 7907.00.6000, 8206.00.0000 or other HTSUS subheadings. While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this investigation 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 steel nails, 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
India	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oman	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sri Lanka	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sri Lanka	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Countervailing 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)

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

I-6. **Related importers/exporters.**-- Does your firm have any related firms, either domestic or foreign, that are engaged in importing steel nails from India, Oman, Sri Lanka, Thailand, or Turkey into the United States or that are engaged in exporting steel nails from India, Oman, Sri Lanka, Thailand, or Turkey to the United States?

☐ No

☐ Yes--List the following information.

Firm name	Country	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Nitin Joshi (202-708-1669, Nitin.Joshi@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 steel nails 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"/>	prolonged shutdowns	
<input type="checkbox"/>	production curtailments	
<input type="checkbox"/>	relocations	
<input type="checkbox"/>	expansions	
<input type="checkbox"/>	acquisitions	
<input type="checkbox"/>	consolidations	
<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, production, employment, and shipments relating to steel nails? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations.

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

- 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 steel nails, and the combined production capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

"Installed overall production capacity" – The level of production that your establishment(s) could have attained, assuming your firm's *optimal* product mix, and based solely on *existing capital investments*, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does not take into account other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity in some industries.

"Practical overall production capacity" – The level of production that your establishment(s) could reasonably have expected to attain, taking into account your firm's *actual* product mix over the period. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate; but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) your firm's existing in place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited your firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production your firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

"Practical "steel nails production capacity" – The level of production of steel nails that your establishment(s) could reasonably have expected to attain. The same assumptions apply to this capacity measure as for practical overall production capacity, but only includes the portion of practical overall production capacity allocated to the production of steel nails based on the actual product mix experienced over the period.

Takes into account	Installed overall production capacity	Practical overall production capacity	Practical steel nails production capacity
Existing capital investments	Yes	Yes	Yes
Product mix	Yes	Yes	Yes
Normal downtime, maintenance, repair and clean-up	No	Yes	Yes
Existing labor force	No	Yes	Yes
Availability of material inputs	No	Yes	Yes
Actual number of shifts and hours operated	No	Yes	Yes
Limited to steel nails	No	No	Yes

“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 short tons)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
Capacity measures:					
Installed overall capacity ¹					
Practical overall capacity ^{1 2}					
Practical steel nails capacity ³					
Production of:					
Steel nails: Collated					
Steel nails: Other than collated					
All in-scope steel nails ³	0	0	0	0	0
Other (i.e., out of scope) products ⁴					
Total production using same machinery or workers	0	0	0	0	0
¹ Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period. ² Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" overall production capacity and "practical" overall production capacity. ³ Data reported for practical steel nails production capacity should be greater than the data reported for production of steel nails in each period, if not revise prior to submission to the Commission. Additionally, if your firm reports the production of no other products on the same machinery and using the same workers as steel nails then "practical overall" and "practical steel nails" capacity measures should be equal to each other. ⁴ Please identify these products: _____.					

- II-3b. **Operating parameters.**--The **practical** overall production capacity reported in II-3a is based on the following operating parameters:

Hours per week	Weeks per year

- II-3c. **Capacity calculations.**--Please describe the methodology used to calculate **installed** and **practical** overall production capacities reported in II-3a, and explain any changes in reported capacities.

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- II-3d. **Practical overall production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's practical overall production capacity over the period reported in question II-3a. If different constraints were binding over different periods reported, please specify when each constraint was limiting your reported practical overall production capacity. If a constraint was not actually binding over the period reported, but was still a constraint to achieving the installed capacity level, indicate at what level it would have been binding.

Constraint <i>(check as many as appropriate)</i>		Description <i>(If checked, please describe the details, timing, and duration of the constraint; leave completely blank if not applicable)</i>
<input type="checkbox"/>	Production bottlenecks	
<input type="checkbox"/>	Existing labor force	
<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 constraints (list the specific constraints in the description field)	

- II-3e. **Reaching installed overall production capacity.**--Please describe and quantify the amount of time it would take and the additional actions that would be needed (e.g., hiring new workers, expanding shifts, procuring larger sources of raw material supply, etc.) for your firm to be able to fully utilize the reported installed overall production capacity reported in II-3a.

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- II-3f. **Excess capacity:** To the extent that your company is reporting excess capacity, please report, with specificity: (1) which machines or equipment (or other elements of production) would need to be brought back into production for your plant to operate at full capacity, and (2) the specific dates on which such machines or equipment were last used by your plant to produce steel nails.

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- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between steel nails 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. **Capacity checklist.**--Please check that the capacity numbers reported in question II-3a follow the Commission's relevant definitions for capacity.

Item	✓ if Yes
Are all three capacity measures reported based on <i>currently installed machinery and equipment</i> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	<input type="checkbox"/>
Are practical overall production capacity and practical steel nails production capacity measures reported based on <i>existing labor force</i> (i.e., the reported capacity level would not require hiring additional production related workers or adding shifts)?	<input type="checkbox"/>
Are practical overall production capacity and practical steel nails production capacity measures based on <i>the actual availability of material inputs</i> ?	<input type="checkbox"/>
Do both practical overall production capacity and practical steel nails production capacity measures account for <i>normal downtime, maintenance, repair and clean-up</i> activities?	<input type="checkbox"/>
Does the difference between practical overall production capacity and practical steel nails production capacity equal the portion of practical overall production capacity that is dedicated to the production of out-of-scope products?	<input type="checkbox"/>

Note: If your firm is not able to certify "yes" to any of the above criteria as it relates to your firm's reported capacity levels, please revise your capacity numbers to be in conformance with the appropriate definition prior to submission to the Commission.

- II-6. **Tolling.**--Since January 1, 2019, has your firm been involved in a toll agreement regarding the production of steel nails?

"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-7. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce steel nails in and/or admit steel nails 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 steel nails into a foreign trade zone (FTZ) for use in distribution of steel nails and/or the production of downstream articles?

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

- II-8. **Shipments and inventory data.**--Report you firm's uses (shipment or storage) of domestically produced steel nails during the specified periods.

"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-8. **Production, shipment, and inventory data.**--Continued

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
Practical steel nails production capacity¹ (quantity) (A)	0	0	0	0	0
Beginning-of-period inventories (quantity) (B)					
Production¹ (quantity) (C)	0	0	0	0	0
U.S. shipments:					
Commercial shipments:					
Quantity (D)					
Value (E)					
Internal consumption:²					
Quantity (F)					
Value ² (G)					
Transfers to related firms:²					
Quantity (H)					
Value ² (I)					
Export shipments:³					
Quantity (J)					
Value (K)					
End-of-period inventories (quantity) (L)					
¹ Data entered in question II-3a for this indicator will populate here. 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-9. **Channels of distribution.** — Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution during the specified periods.

Quantity (in short tons) and value (in \$1,000)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
U.S. shipments:					
to Distributors:					
Quantity (M)					
Value (N)					
to Retailers:					
Quantity (O)					
Value (P)					
to End users:					
Quantity (Q)					
Value (R)					

RECONCILIATION OF CHANNELS. — Please ensure that the quantities and values reported for channels of distribution (i.e., lines M through R) in each time period equal the quantity and value reported for U.S. shipments (i.e., 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: $M + O + Q - D - F - H = \text{zero}$ ("0"), if not revise.	0	0	0	0	0
Value: $N + P + R - E - G - I = \text{zero}$ ("0"), if not revise.	0	0	0	0	0

- II-10. **U.S. shipments by type and finish.** —Please provide the quantity and value of your firm's U.S. shipments (inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of steel nails in 2021 by type and finish.

Quantity (in short tons) and value (in \$1,000)		
Type and finish	Calendar year 2021	
	Quantity	Value
Collated:		
Bright (no finish) nails (S)		
Galvanized nail (T)		
Other nails (U)		
All collated steel nails	0	0
Bulk:		
Bright (no finish) nails (V)		
Galvanized nails (W)		
Other nails (X)		
All uncollated steel nails	0	0
All steel nails	0	0

RECONCILIATION OF U.S. SHIPMENTS BY TYPE AND FINISH.—Please ensure that the total quantity and value reported for U.S. shipments by type and finish equals the quantity and value reported for U.S. shipments (i.e., lines D through I) 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.

Item	Calendar year 2021
Quantity: S + T + U + V + W + X – D – F – H = zero ("0"), if not revise.	0
Value: S + T + U + V + W + X – E – G – I = zero ("0"), if not revise.	0

- II-11. **U.S. shipments by month.**—Report your firm's U.S. shipments (inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of steel nails in the specified periods below.

Month	U.S. shipments quantity (in short tons)
2021.—	
January (Y)	
February (Z)	
March (AA)	
April (AB)	
May (AC)	
June (AD)	
July (AE)	
August (AF)	
September (AG)	
October (AH)	
November (AI)	
December (AJ)	
2022.—	
January (AK)	
February (AL)	
March (AM)	
April (AN)	
May (AO)	
June (AP)	

RECONCILIATION. — Please ensure that the sum of the quantities reported for 2021 (lines Y through AJ), Jan.-March 2021 (lines Y through AA), and Jan.-March 2022 (lines AK through AM) for monthly U.S. shipments equal the quantities reported for U.S. shipments (i.e., lines D, F, H) for 2021 and Jan.-March 2022 in question II-7. 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 item	Calendar year 2021	Jan-March 2021	Jan-March 2022
Quantity: Data in this question (see note above)— D – F – H = zero ("0"), if not revise.	0	0	0

- II-12. **Employment data.**--Report your firm's employment-related data related to the production of steel nails 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 steel nails 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 short tons)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
Purchases from U.S. importers¹ of steel nails from—					
India					
Oman					
Sri Lanka					
Thailand					
Turkey					
Subject sources	0	0	0	0	0
All other sources					
Purchases from domestic producers²					
Purchases from other sources³					
Total purchases	0	0	0	0	0
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 steel nails from Indian, Oman, Sri Lanka, Thailand and Turkey at any time since January 1, 2019, report those purchases by the individual importer of record and subject source.

Purchases of subject imports

Quantity (<i>in short tons</i>)						
Importer of record	Subject source	Calendar year			January-March	
		2019	2020	2021	2021	2022
Subject sources		0	0	0	0	0

II-15. Purchases of imports from subject sources.—Continued.

***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 steel nails?

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

- II-17. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Zahra Bekkal (202-205-2684, Zahra.Bekkal@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:

Note.--Please provide all financial data in part III on a calendar year basis.

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include steel nails:
- _____
2. Does your firm prepare profit/loss statements for steel nails:
☐ 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 steel nails, as well as specific statements and worksheets) used to compile these data.

- III-3. **Cost accounting system.**--Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

- III-4. **Allocation basis.**--Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

--

- III-5. **Product listing.**--Please list the products your firm produced in the facilities in which your firm produced steel nails and provide the share of net sales accounted for by these products in your firm's most recent calendar year.

Products	Share of sales
Bulk steel nails	%
Collated steel nails	%
	%
	%
	%

- III-6. **Inputs from related suppliers.**--Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of steel nails 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-8.
<input type="checkbox"/>	<input type="checkbox"/>

- III-7a. **Inputs from related suppliers detailed.**--Please identify the inputs used in the production of steel nails 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 on the basis of your most recently completed calendar year. 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-7b. **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 steel nails) 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-8. **Steel scrap: steel nails producers.**—Does your firm generate any revenues from the sales of any steel scrap produced during the course of producing steel nails:

☐ Yes ☐ No

If your answer is "yes", report the revenues associated with the sale or transfer of steel scrap for your firm's three most recently completed calendar years, and for the specified interim periods.

Note: the data provided below will appear in question III-9a as a reduction to COGS

Value (in \$1,000)					
Item	Calendar year			January-March	
	2019	2020	2021	2021	2022
Steel scrap sales revenue ¹					
¹ Please describe how your firm classifies these steel scrap revenues in the normal course of business (e.g., included in net sales values, as a reduction to COGS, included in "all other income")._____					

III-9a. **Operations on steel nails.**--Report the revenue and related cost information requested below on the steel nails 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. Provide data for your firm's three most recently completed calendar years, and for the specified interim periods.

Quantity (in short tons) 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					
Raw materials					
Direct labor					
Other factory costs					
Less: Steel scrap revenue	0	0	0	0	0
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) 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.

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

- III-9b. **Financial data reconciliation.**--The calculable line items from question III-9a (i.e., total net sales quantities and values, total COGS, gross profit (or loss), operating profit (or loss), and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?

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

Input	Share of total raw material costs (percent)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Wire		<input type="checkbox"/>	<input type="checkbox"/>
Wire rod		<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs ¹		<input type="checkbox"/>	<input type="checkbox"/>
Total (should sum to 100 percent)	0.0		
¹ Please indicate any other notable "other" raw materials not expressly identified above and provide the share of the total raw material costs that they account for: ____.			

- III-9d. **Raw materials.**—Has wire and wire rod as a share of total raw materials changed between 2019 and 2021 and during the interim periods:

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

- 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 question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (*in \$1,000*), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

Item	Calendar year			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 question III-9a.

--

III-12a. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of steel nails. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for steel nails 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. Provide data as of the end of your firm's three most recently completed calendar years.

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 steel nails. Provide data for your firm's three most recently completed calendar years, and for the specified interim periods.

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-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-8 (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-8 (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-8 (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 steel nails from India, Oman, Sri Lanka, Thailand, and Turkey?

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 steel nails from India, Oman, Sri Lanka, Thailand, and Turkey?

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 steel nails from India, Oman, Sri Lanka, Thailand, and Turkey?

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, 2019 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 steel nails as reported in III-9a? In your response, please include the duration and timing of any 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.

--

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Craig Thomsen (202-205-3226, craig.thomsen@usitc.gov).

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

Name	
Title	
Email	
Telephone	

PRICE DATA

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2019 of the following products produced by your firm.

Product 1.— Nominal 3" x 0.131" (10.25 gauge), bright smooth shank, 20-22 degree plastic-strip collated nails sold to distributors

Product 2.— Nominal 3" x 0.120" (11 gauge), bright smooth shank, 20-22 degree plastic-strip collated nails sold to distributors

Product 3.— Nominal 2" x 0.099" (12.5 gauge), bright screw (threaded), 15 degree wire coil collated nails sold to distributors

Product 4.— Nominal 3" x 0.131" (10.25 gauge), stainless steel, ring shank, 20-22 degree plastic-strip collated and uncollated nails sold to distributors

Product 5.— Nominal 3" x 0.131" (10.25 gauge), bright smooth shank, 20-22 degree plastic-strip collated nails sold to retailers

Product 6.— Nominal 1-1/4" x 0.120" smooth shank galvanized wire welded roofing coil nails sold to retailers

Product 7.— Nominal 2" x 0.113" (11.5 gauge), bright drive screw (threaded) shank, machine grade bulk nails sold to end users

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 tables 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 quantity data in **short tons (product 7) or 1,000 nails (all other products)**

Report all value data in **actual dollars** (not 1,000s).

Period of shipment	Product 1 (1,000 nails)		Product 2 (1,000 nails)		Product 3 (1,000 nails)		Product 4 (1,000 nails)	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2019:								
Jan.-Mar.								
Apr.-Jun.								
Jul.-Sept.								
Oct.-Dec.								
2020:								
Jan.-Mar.								
Apr.-Jun.								
Jul.-Sept.								
Oct.-Dec.								
2021:								
Jan.-Mar.								
Apr.-Jun.								
Jul.-Sept.								
Oct.-Dec.								
2022:								
Jan.-Mar.								

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-2b. Price data--Continued

Report quantity data in **short tons (product 7) or 1,000 nails (all other products)**

Report all value data in **actual dollars** (not 1,000s).

Period of shipment	Product 5 (1,000 nails)		Product 6 (1,000 nails)		Product 7 (short tons)	
	Quantity	Value	Quantity	Value	Quantity	Value
2019:						
Jan.-Mar.						
Apr.-Jun.						
Jul.-Sept.						
Oct.-Dec.						
2020:						
Jan.-Mar.						
Apr.-Jun.						
Jul.-Sept.						
Oct.-Dec.						
2021:						
Jan.-Mar.						
Apr.-Jun.						
Jul.-Sept.						
Oct.-Dec.						
2022:						
Jan.-Mar.						

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 5:

Product 6:

Product 7:

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 1,000 nails or short tons?	<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. **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

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

- IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of steel nails (*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 steel nails 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 steel nails 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 steel nails (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: _____.				

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 steel nails?

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 steel nails 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 steel nails 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 steel nails that is accounted for by U.S. inland transportation costs? _____ percent

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

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

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

☐ 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 steel nails?		
		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 steel nails 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 steel nails 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 steel nails market subject to business cycles and/or other conditions of competition distinctive to steel nails? 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 steel nails since January 1, 2019?

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

IV-17. Supply constraints.—

- (a) How frequently has your firm refused, declined, or been unable to supply steel nails in the following time periods? (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 or requested quantities, extending etc.)?

Period	Frequently	Occasionally	Infrequently	Never	If any answer besides “never,” please describe, including the reason, timing, and duration of the constraint.
2017 - 2018	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2019 1 st half	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2019 2 nd half	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2020 1 st half	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2020 2 nd half	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2021 1 st half	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2021 2 nd half	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2022 year-to-date	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Role of the section 232 measures.**—Did the measures (e.g. tariffs, quotas, etc.) on imported steel/aluminum products under section 232, or changes in the measures (such as the level, coverage, or nature of the measures), have an impact on the steel nails market in the United States, including any effects on steel nails' cost, price, supply, and/or demand, since January 1, 2019?

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.

--

- IV-19. **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 steel nails market in the United States, including any effects on steel nails' cost, price, supply, and/or demand, since January 1, 2019?

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.

--

- IV-20. **Raw materials.**--How have steel nails 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 steel nails.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-21. **Interchangeability.**—Is steel nails 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	India	Oman	Sri Lanka	Thailand	Turkey	Other countries
United States						
India						
Oman						
Sri Lanka						
Thailand						
Turkey						

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

IV-22. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between steel nails 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

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

[illegible]

- IV-23. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for steel nails since January 1, 2019. Indicate the share of the quantity of your firm's U.S. shipments of steel nails that each of these customers accounted for in 2021. Please include your largest customer that is a distributor, retailer, and end user in the rows D, R, and EU, respectively, if they not among your top 10 purchasers.

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

IV-22. Competition from imports.--

- (a) **Lost revenue.**--Since January 1, 2019: To avoid losing sales to competitors selling steel nails from India, Oman, Sri Lanka, Thailand, and/or Turkey, 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 steel nails to imports of this product from India, Oman, Sri Lanka, Thailand, and/or Turkey?

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

- IV-23. **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://usitc.gov/investigations/701731/2022/steel_nails_india_oman_sri_lanka_thailand_and/final.htm

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

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

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

- **E-mail.**—E-mail the MS Word questionnaire to Nitin.Joshi@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 (202-205-1802). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7).