

## U.S. PRODUCERS' QUESTIONNAIRE

### SUPERABSORBENT POLYMERS FROM SOUTH KOREA

This questionnaire must be received by the Commission by **August 3, 2022**.  
*See last page for filing instructions.*

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping investigation concerning superabsorbent polymers ("SAP") from South Korea (Inv. No. 731-TA-1574 (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 SAP (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: **POLY**)

#### 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 November 2, 2021, by the Ad Hoc Coalition of American SAP Producers, whose members include BASF Corporation, Florham Park, New Jersey; Evonik Superabsorber LLC, Greensboro, North Carolina; and Nippon Shokubai America Industries, Inc., Pasadena, Texas. Antidumping duties may be assessed on the subject imports as a result of this proceeding if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of dumping. Questionnaires and other information pertinent to this proceeding are available at

[https://www.usitc.gov/investigations/701731/2021/superabsorbent\\_polymers\\_korea/final.htm](https://www.usitc.gov/investigations/701731/2021/superabsorbent_polymers_korea/final.htm).

**SAP** covered by this investigation is superabsorbent polymers (SAP), which is cross-linked sodium polyacrylate most commonly conforming to Chemical Abstracts Service (CAS) registry number 9003-04-7, where at least 90 percent of the dry matter, by weight on a nominal basis, corrected for moisture content, is comprised of a polymer with a chemical formula of  $(C_3H_3O_2Na_xH_{1-x})_n$ , where  $x$  is within a range of 0.00-1.00 and there is no limit to  $n$ . The subject merchandise also includes merchandise with a chemical formula of  $\{(C_2H_3) COONa_yH_{(1-y)}\}_n$ , where  $y$  is within a range of 0.00-1.00 and there is no limit to  $n$ . The subject merchandise includes SAP which is fully neutralized as well as SAP that is not fully neutralized.

The subject merchandise may also conform to CAS numbers 25549-84-2, 77751-27-0, 9065-11-6, 9033-79-8, 164715-58-6, 445299-36-5, 912842-45-6, 561012-86-0, 561012-85-9, or 9003-01-4.

All forms and sizes of SAP, regardless of packaging type, including but not limited to granules, pellets, powder, fibers, flakes, liquid, or gel are within the scope of this investigation. The scope also includes SAP whether or not it incorporates additives for anticaking, anti-odor, anti-yellowing, or similar functions.

The scope also includes SAP that is combined, commingled, or mixed with other products after final sieving. For such combined products, only the SAP component is covered by the scope of this investigation. SAP that has been combined with other products is included within the scope, regardless of whether the combining occurs in third countries. A combination is excluded from this investigation if the total SAP component of the combination (regardless of the source or sources) comprises less than 50 percent of the combination, on a nominal dry weight basis.

SAP is classified under the Harmonized Tariff Schedule of the United States (HTSUS) subheading 3906.90.50. SAP may also be imported into the United States under HTSUS subheading 3906.10.00. Although the HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes, the written description of the merchandise is dispositive.

**Definitions.**

**"SAP-7."**--Proprietary SAP Generation 7 ("SAP-7") SAP-7 is designed for use in baby diapers and features an effective capacity ("EFC") of more than 25.0 g/g and a T20 rating of less than 170 seconds. SAP-7 excludes the product that meets the more stringent test parameters defined as SAP-8.

**"SAP-8."**-- Proprietary grade of SAP is designed to be used without wood pulp in baby diapers and features EFC of more than 25.5 g/g and a T20 rating of less than 145 seconds.

**"Next-LK1."**-- Proprietary Next-LK1 features a guaranteed absorbency under load value tested at 0.9 psi and vortex with less than 50 seconds. LK1 excludes the product that meets the more stringent test parameters defined as Next-LK2.

**"Next-LK2."**--Proprietary Next-LK2 features a guaranteed absorbency under load value tested at 0.9 psi and vortex with less than 35 seconds.

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

Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
<sup>1</sup> 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?

<b>No</b>	<b>Yes</b>
<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
South Korea	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

☐ No                      ☐ Yes--List the following information, relating to the ultimate parent/owner.

<b>Firm name</b>	<b>Country</b>	<b>Extent of ownership (percent)</b>

***"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 SAP from South Korea into the United States or that are engaged in exporting SAP from South Korea to the United States?

☐ No                      ☐ Yes--List the following information.

<b>Firm name</b>	<b>Country</b>	<b>Affiliation</b>

I-7. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of SAP?

☐ No      ☐ Yes--List the following information.

[illegible]

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

Further information on this part of the questionnaire can be obtained from **Celia Feldpausch (202-205-2387, [celia.feldpausch@usitc.gov](mailto:celia.feldpausch@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 SAP 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 blank if not applicable)</i>
<input type="checkbox"/>	plant openings	
<input type="checkbox"/>	plant closings	
<input type="checkbox"/>	relocations	
<input type="checkbox"/>	expansions	
<input type="checkbox"/>	acquisitions	
<input type="checkbox"/>	consolidations	
<input type="checkbox"/>	prolonged shutdowns or production curtailments	
<input type="checkbox"/>	revised labor agreements	
<input type="checkbox"/>	weather related events	
<input type="checkbox"/>	other (e.g., technology, modifications to existing production lines)	

- 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 SAP? 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 SAP, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

**"Overall production capacity" or "capacity"** – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-7. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-7 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

**"Production"** – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

Quantity (in metric tons)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Overall production capacity<sup>1</sup></b>					
<b>Production of:</b>					
SAP <sup>2</sup>	0	0	0	0	0
Other products <sup>3</sup>					
Total production using same machinery or workers	0	0	0	0	0
<sup>1</sup> Data reported for capacity (first line) should be greater than data reported for total production (last line). <sup>2</sup> Data entered for production of SAP will populate here once reported in question II-7. <sup>3</sup> Please identify these products: _____.					

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

Hours per week	Weeks per year

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

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- II-3d. **Production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's production capacity. If your firm experienced any constraints since January 1, 2019, please describe the timing and duration of those constraints.

--

- II-3e. **Production and supply constraints.**--Please describe any supply constraints (including the timing) and their impact on your firm's capacity and ability to produce any particular grade of SAP (SAP-7 and SAP-8).

Grade	Able to produce (capacity)	Actually produced (production)	Constraints that set limit(s) on your firm's ability to product the specified grade. If your firm was able to produce the grade and did not actually produce the specified grade please explain why. If your firm experienced any constraints by grade since January 1, 2019, please describe the timing and duration of those constraints.
SAP 7			
SAP 8			
Next LK1			
Next LK2			
All other grades of SAP			

II-3f. **Qualification for customer-specific SAP products.**—Did your firm qualify to make any of the following products?

<b>Grade</b>	<b>No</b>	<b>Yes</b>	<b>If Yes—Describe the qualification process, from initial discussions to the first shipment, the steps required by the purchaser, and the total cost for qualifying.</b>
SAP 7			
SAP 8			
Next LK1			
Next LK2			
All other grades of SAP			

II-3g. **Production method.**--Please report the type of polymerization method that your firm uses to produce SAP (i.e., belt polymerization or kneading polymerization).

<b>Grade</b>	<b>Belt polymerization</b>	<b>Kneading polymerization</b>	<b>Other</b>	<b>If "other", describe.</b>
SAP 7				
SAP 8				
Next LK1				
Next LK2				
Other grades				

II-4. **Product shifting.**—

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

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

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

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

**“Toll agreement”**—Agreement between two firms whereby the first firm furnishes the raw materials and the second firm uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	If yes—Please describe the toll arrangement(s) and name the firm(s) involved.
<input type="checkbox"/>	<input type="checkbox"/>	

II-6. **Foreign trade zones.**—

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

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

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

***"Average production capacity" or "capacity"*** – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

***"Production"*** – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

***"Commercial U.S. shipments"*** –Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

***"Internal consumption"*** – Product consumed internally by your firm. Such transactions are valued at fair market value.

***"Transfers to related firms"*** –Shipments made to related firms. Such transactions are valued at fair market value.

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

***"Export shipments"*** –Shipments to destinations outside the United States, including shipments to related firms.

***"Inventories"***— Finished goods inventory, not raw materials or work-in-progress.

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

II-7. **Production, shipment, and inventory data.**—*Continued*

Quantity (in metric tons, dry weight) and value (in \$1,000)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Average production capacity<sup>1</sup> (quantity)</b> (A)					
<b>Beginning-of-period inventories</b> (quantity) (B)					
<b>Production:</b>					
SAP 7					
SAP 8					
Next-LK1					
Next-LK2					
All other grades of SAP					
<b>Production, all grades (C)</b>					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (D)					
Value (E)					
<b>Internal consumption:<sup>2</sup></b>					
Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:<sup>2</sup></b>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:<sup>3</sup></b>					
Quantity (J)					
Value (K)					
<b>End-of-period inventories (quantity) (L)</b>					
<p><sup>1</sup> The production capacity reported is based on operating ____ hours per week, ____ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity ____.</p> <p><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.</p> <p><sup>3</sup> Identify your firm's principal export markets: _____.</p>					

II-7. **Production, shipment, and inventory data.—Continued**

**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-June	
	2019	2020	2021	2021	2022
B + C + 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-8. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
	<b>Quantity (in metric tons, dry weight)</b>				
<b>Channels of distribution:</b>					
<b>U.S. shipments:</b>					
To distributors (M)					
to Hygiene-related end users (N)					
to Non-hygiene-related end users (O)					

***RECONCILIATION OF CHANNELS.**-- Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, and O) in each time period equal the quantity reported for U.S. shipments (i.e., lines E, G, I, and K) 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 item	Calendar year			January-June	
	2019	2020	2021	2021	2022
M + N + O – F – H – J= zero ("0"), if not revise.	0	0	0	0	0

II-9. **U.S. shipments by product grade.** --Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by SAP grade for 2019-21 and January-June 2021 and January-June 2022.

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
	<b>Quantity (in metric tons, dry weight) and value (in \$1,000)</b>				
<b>U.S. shipments by SAP grade:</b>					
SAP-7:					
Quantity (P)					
Value (Q)					
SAP-8:					
Quantity (R)					
Value (S)					
Next-LK1:					
Quantity (T)					
Value (U)					
Next-LK2:					
Quantity (V)					
Value (W)					
All other SAP grades or products: <sup>1</sup>					
Quantity (X)					
Value (Y)					
<sup>1</sup> Please identify the other products: _____.					

**RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE.** --Please ensure that the quantities and values reported for U.S. shipment by product type (i.e., lines P through Y) in 2019-21 and January-June 2021 and January-June 2022 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			January-June	
	2019	2020	2021	2021	2022
Quantity: P + R + T + V + X – D – F – H = zero ("0"), if not revise.	0	0	0	0	0
Value: Q + S + U + W + Y – E – G – I = zero ("0"), if not revise.	0	0	0	0	0

- II-10. **Employment data.**--Report your firm's employment-related data related to the production of SAP 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 June 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-June	
	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-11. **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-12. **Purchases.**--Has your firm purchased SAP 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.

<b>No</b>	<b>Yes</b>	<b>If yes--Report such purchases in the table below and explain the reasons for your firms' purchases.</b>
<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

<b>(Quantity in metric tons, dry weight)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-June</b>	
	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2021</b>	<b>2022</b>
<b>Purchases from U.S. importers<sup>1</sup> of SAP from—</b> South Korea					
All other sources					
<b>Purchases from domestic producers<sup>2</sup></b>					
<b>Purchases from other sources<sup>3</sup></b>					
<sup>1</sup> 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: _____. <sup>2</sup> Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. <sup>3</sup> Please list the name of the firm(s) from which your firm purchased this product: _____.					

II-13. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of SAP from South Korea at any time since January 1, 2019, report those purchases by the individual importer of record and subject source.

## Purchases of subject imports

[illegible]

II-13. **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-June	
	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-14. **Imports.**--Since January 1, 2019, has your firm imported SAP?

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

II-15. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

--

**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Jennifer Catalano (202-205-2056, [Jennifer.Catalano@usitc.gov](mailto:Jennifer.Catalano@usitc.gov)) or Charles Yost (202-708-1445, [Charles.yost1@usitc.gov](mailto:Charles.yost1@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 report 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 SAP:
- \_\_\_\_\_
2. Does your firm prepare profit/loss statements for SAP:  
☐ 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 SAP, 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 SAP and provide the share of net sales accounted for by these products in your firm's most recent fiscal year.

Products	Share of sales
SAP-7	%
SAP-8	
LK1	
LK2	
All other SAP	
All SAP	%
	%
	%
	%

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

<b>Yes--Continue to question III-7</b>	<b>No—Skip to question III-9a.</b>
<input type="checkbox"/>	<input type="checkbox"/>

- III-7. **Inputs from related suppliers detailed.**--Please identify the inputs used in the production of SAP 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
<b>Input valuation as recorded in the firm's accounting books and records</b>		

- III-8. **Inputs purchased from related suppliers.**--Please confirm that the inputs purchased from related suppliers, as identified in III-7, are reported in III-9a (financial results on SAP) in a manner consistent with your firm's accounting books and records.

<b>Yes</b>	<b>No</b>	<b>If no--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

- III-9a. **Operations on SAP.**--Report the revenue and related cost information requested below on the SAP operations of your firm's U.S. establishment(s).<sup>1</sup> 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 metric tons, dry weight) and value (in \$1,000)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Net sales quantities:</b> <sup>2</sup>					
Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
<b>Net sales values:</b> <sup>2</sup>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
<b>Cost of goods sold (COGS):</b> <sup>3</sup>					
Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>Selling, general, and administrative (SG&amp;A) expenses</b>					
<b>Operating income (loss)</b>	0	0	0	0	0
<b>Other expenses and income:</b>					
Interest expense					
All other expense items					
All other income items					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0
<b>Depreciation/amortization included above</b>					
<sup>1</sup> Include only sales (whether <u>domestic or export</u> ) and costs related to your <u>U.S. manufacturing operations</u> . <sup>2</sup> 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. <sup>3</sup> COGS (whether for domestic or export sales) should include <u>costs associated with CS, IC, and Transfers</u> .					

*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><b>If no</b>--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
Acrylic acid		<input type="checkbox"/>	<input type="checkbox"/>
Sodium hydroxide (caustic soda)		<input type="checkbox"/>	<input type="checkbox"/>
Initiators; crosslinking agents; and neutralizing agents <sup>1</sup>		<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs <sup>2</sup>		<input type="checkbox"/>	<input type="checkbox"/>
Total (should sum to 100 percent) <sup>3</sup>	0.0		

<sup>1</sup> Provide the share of the total raw material costs above that initiators, crosslinking agents, and neutralizing agents together account for and, identify the initiator(s) used by your firm to produce SAP: \_\_\_\_\_; Identify the crosslinking agents used by your firm to produce SAP: \_\_\_\_\_; Identify the neutralizing agents used by your firm to produce SAP: \_\_\_\_\_

<sup>2</sup> 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: \_\_\_\_\_.

<sup>3</sup> Have the shares of components of raw materials materially changed during 2019-21? If yes, please provide a brief description of the changes: \_\_\_\_\_

III-9d. **Indexing of sales of SA polymers against raw materials.** —Does your firm index sales prices to raw material costs (e.g., propylene and/or caustic soda and/or acrylic acid)?

Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	If yes, please provide responses to the questions that follow.
Please provide a brief explanation of your firm's pricing formula also in question IV-7(b). Describe here the relationship between indexing to raw materials and sales prices to customers, particularly whether contracts with customers differ in their base price and indexes and any lag between changes in raw material costs and sales prices.		
If the purchase prices paid by your firm for raw materials during the period differed in a meaningful way from index prices, please indicate when any price divergence occurred and provide detailed explanations of the cause or causes of any divergencies.		
Please explain how the practice of indexing prices to raw material costs affected your firm's profitability.		

III-9e. **Hedging of raw material costs.**—Does your firm hedge its raw material costs (the costs of acquiring its raw materials such as, propylene and/or acrylic acid and/or caustic soda, as appropriate) used in the production of SA polymers?

Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	If yes, please respond to the questions below.
Please specify which raw material costs are hedged.		
Please explain how the practice of hedging raw material costs affected your firm's profitability.		
Please also address whether these hedging practices yielded the intended financial results.		

III-9f. **Impact of weather-related events.**—Did weather related events (e.g., Winter Storm Uri, hurricane activity) affect your firm's operations and profitability during 2019-21?

Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	If yes--please respond to the questions below.
Specify which actions your firm took in response to weather-related events (e.g., declared force majeure for certain time periods, ceased production, put customers on allocation, etc).		
Specify how your firm's response to weather related events affected its sales and costs.		

- 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-June	
	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 SAP. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for SAP 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 SAP. 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-June	
	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-7 (including export shipments) as long as they are reported on the same calendar year basis.

*RECONCILIATION OF TRADE VS FINANCIAL DATA.*—Please ensure that the quantities and values reported for total shipments in Part II equal the quantities and values reported for total net sales in Part III of this questionnaire in each time period. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Quantity:</b> Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
<b>Value:</b> Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

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

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

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 SAP from South Korea?

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

<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 SAP from South Korea?

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

<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 SAP from South Korea?

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

- III-18. **Effects on financial performance of COVID-19.**— Since January 1, 2020, has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus affected the financial performance of your firm's operations on SAP 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 Cindy Cohen (202-205-3230, cindy.cohen@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 and **sold pursuant to a contract/agreement of one year or more in duration, in sales volumes of at least 500 kg:**

**Product 1.**-- Permeable and fast SAP for thin or ultra-thin hygiene products, including the following parameters:

- vortex speed of 45 seconds or less;
- gel bed permeability ("GBP") of 30 or greater; and
- centrifuge retention capacity ("CRC") within a range of 27 to 33 g/g.

**Product 2.**-- Balanced absorption under pressure ("AAP") SAP for balanced to thin hygiene products, including the following parameters:

- AAP 0.7 psi within a range of 18 to 24 g/g;
- GBP of less than 10; and
- CRC within a range of 34 to 42 g/g.

**Product 3.**-- Permeable and Pressure-resistant SAP for thin or ultra-thin hygiene products, including the following parameters:

- AAP under 0.7 psi ("AAP") within a range of 19 to 30 g/g; and
- CRC within a range of 26 to 33 g/g.

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

IV-2b. **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm.

Report data in **metric tons, dry weight** and **actual dollars** (not 1,000s).

Period of shipment	Product 1		Product 2		Product 3	
	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						
April-June						

<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 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. In addition, please list the specific grades and the names of the customers to whom you sold each of these products.

Product 1:

Product 2:

Product 3:

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:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000) and metric tons, dry weight?	<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"/>
Limited to contracts/agreements of one year or more in duration?	<input type="checkbox"/>
Limited to sales in volumes of at least 500kg?	<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 SAP (*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"/>	

- 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 SAP 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 SAP 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.**—

- (a) Please fill out the table regarding your firm's typical sales contracts for U.S.-produced SAP (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	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"/>

- (b) Please provide a brief explanation of your firm's pricing formula(s), which should include a specific description of how propylene, caustic acid, and acrylic acid index prices are included in the formula(s). Also indicate how often prices are updated for changes in the index, and any lag between changes in the index and changes in SAP price.

--

IV-7. **Contract provisions.**—Continued

(c) Please list the following information your firm's five largest SAP contracts with U.S. customers.

Customer name	Start/end dates	SAP grade(s)	How prices determined (i.e., fixed, indexed to raw materials)	Formula and/or index for determining price	Frequency of updates to contract/index price

(d) Since January 1, 2019, have prices changed during any of these contracts, aside from raw material indexed formula price changes specified in the contract?

No	Yes	If yes, please explain, noting the specific contract, when the price change occurred, and the reasons for the change.
<input type="checkbox"/>	<input type="checkbox"/>	

(e) Describe any contract negotiations for sales of SAP your firm has engaged in since January 1, 2019.

--

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 SAP?

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

Geographic area	✓ if applicable
<b>Northeast.</b> --CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
<b>Midwest.</b> --IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
<b>Southeast.</b> --AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
<b>Central Southwest.</b> --AR, LA, OK, and TX.	<input type="checkbox"/>
<b>Mountains.</b> --AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
<b>Pacific Coast.</b> --CA, OR, and WA.	<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"/>

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

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

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

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

☐ 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 SAP?		
		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 SAP has changed since January 1, 2019. Explain any trends and describe the principal factors that have affected these changes in demand, including any differences in the demand for different grades of SAP.

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 SAP 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 SAP market subject to business cycles and/or other conditions of competition distinctive to SAP? If yes, describe.

<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 SAP since January 1, 2019?

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

**IV-17. Supply constraints.—**

- (a) Has your firm refused, declined, or been unable to supply SAP at any time between January 1, 2019 and November 2, 2021 (examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

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

- (b) Has your firm experienced any supply constraints since the petition was filed on November 2, 2021?

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

IV-18. **Raw materials.**--How have SAP 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 SAP.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-19. **Interchangeability.**--Is SAP 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:

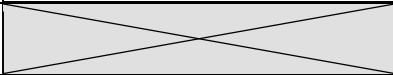
A = the products from a specified country-pair are *always* interchangeable

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	South Korea	Other countries
United States		
South Korea		
For any country-pair producing SAP that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:		

IV-20. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between SAP 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:

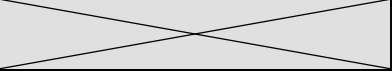
A = such differences are *always* significant

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	South Korea	Other countries
United States		
South Korea		
<p>For any country-pair for which factors other than price are <i>always</i> or <i>frequently</i> a significant factor in your firm's sales of SAP, identify the country-pair and relevant factors and report the advantages or disadvantages imparted by such factors:</p>		

IV-21. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for SAP since January 1, 2019. Indicate the share of the quantity of your firm's U.S. shipments of SAP that each of these customers accounted for in 2021.

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

**IV-22. Competition from imports.--**

- (a) **Lost revenue.**--Since January 1, 2019: To avoid losing sales to competitors selling SAP from South Korea, 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 SAP to imports of this product from South Korea?

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.

## HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

[https://www.usitc.gov/investigations/701731/2021/superabsorbent\\_polymers\\_korea/final.htm](https://www.usitc.gov/investigations/701731/2021/superabsorbent_polymers_korea/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:** **POLY**

- **E-mail.**—E-mail the MS Word questionnaire to [celia.feldpausch@usitc.gov](mailto:celia.feldpausch@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).