

U.S. PURCHASERS' 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 possession (19 U.S.C. § 1333(a)). Further information on this questionnaire can be obtained from Cindy Cohen (202-205-3230, cindy.cohen@usitc.gov).

Name of firm _____
Address _____
City _____ State _____ Zip Code _____
Website _____

Has your firm purchased, or imported for its own use, SAP (as defined on next page) from any source (domestic or foreign) 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 submitting 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.

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.

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

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.

I-1a. **Establishments covered.**--Provide the name and address of your U.S. establishment(s) covered by this questionnaire, if different from that listed on the cover page. **Firms operating more than one establishment should combine the data for all establishments into a single response.**

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

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I-1b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

I-1c. **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-2. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

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

Firm name	Country	Extent of ownership (percent)

I-3. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which import SAP into the United States or which export SAP to the United States?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

I-4. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which produce SAP?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

PART II.--PURCHASES

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

Name	
Title	
Email	
Telephone	

II-1. **Purchases and imports.**--Report separately your firm's domestic purchases and imports of SAP.

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

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

	2019	2020	2021	January-June 2022
Item	Quantity (in metric tons, dry weight)			
Purchases of SAP produced in—				
United States				
South Korea				
All other countries ¹				
Sources unknown ²				
Total purchases	0	0	0	0
Imports of SAP from—				
South Korea				
All other countries ¹				
Total imports ³	0	0	0	0
¹ Please identify these countries: ² Please indicate the firm(s) from which you purchased this merchandise: ³ If your firm imported SAP at any time since January 1, 2019, please also complete and return a U.S. importers' questionnaire in this proceeding.				

- II-2. **Changes in purchasing patterns.**--Please indicate how the shares of your firm's purchases of SAP from different sources have changed since January 1, 2019.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
South Korea	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sources unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- II-3. **Purchasing subject imports rather than domestic products.**—

- (a) Since January 2019, did your firm import and/or purchase imports of SAP from South Korea instead of purchasing U.S.-produced SAP?

Source	Yes (also respond to parts (b) and (c))	No (If "No", skip to next question)
South Korea	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If you responded "Yes" to part (a), was the imported product priced lower than the domestic product?

Source	Yes	No	If yes, please indicate the years or time periods in which the imported product was priced lower than the domestic product.
South Korea	<input type="checkbox"/>	<input type="checkbox"/>	

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

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2019 (in metric tons, dry weight)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
South Korea	<input type="checkbox"/>		<input type="checkbox"/>	
If the quantity reported above exceeds the total quantity reported in II-1, please explain.				

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

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

Source	Yes (also respond to question part (b))	No (If “No”, skip to next question)	Don’t know
South Korea	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If your firm responded “yes”, please provide an estimate of the reduction in U.S. producers’ prices and any additional explanations.

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

- II-5. **Country knowledge.**--Please indicate the countries of origin with which your firm has experience or information in the SAP market.

United States	South Korea	Other countries	Other countries (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- II-6. **Supplier identification.**--Please list your firm's **FIVE** largest suppliers for SAP since January 1, 2019. Also, provide the share of the quantity of your firm's total purchases of SAP that each of these suppliers accounted for in 2021.

No.	Supplier's name	City and state	Share of quantity of 2021 purchases
1			%
2			%
3			%
4			%
5			%
If the shares provided by each supplier varied from January 2019 to June 2022, please describe.			

II-7. Price and contract negotiations.—

(a) Has your firm purchased SAP via annual or longer-term contracts since January 1, 2019?

No	Yes- answer b and c
<input type="checkbox"/>	<input type="checkbox"/>

(b) Fill out the following information for each contract.

Supplier 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

(c) 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 changed occurred, and the reasons for the change.
<input type="checkbox"/>	<input type="checkbox"/>	

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

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PART III.--MARKET CHARACTERISTICS AND PURCHASING PRACTICES

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

End user (hygiene)	End user (other)	Distributor	Other	Describe other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-2. **End uses.**--List the top 3 products your firm makes using SAP and estimate the percent of your total production cost that is accounted for by SAP and by other inputs (such as labor, energy, and other raw materials).

Product(s) your firm produces	Share of total cost in each of the product(s) your firm produces accounted for by				Total (should sum to 100.0% across)
	SAP		Other inputs		
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %

III-3. **Demand for end-use products.--**

- (a) Has the demand for your firm's final products incorporating SAP changed since January 1, 2019?

Increased	No change	Decreased	Fluctuated
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Has this had any effect on your firm's demand for SAP?

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

- (c) Have changes in demand for final products incorporating SAP varies since January 1, 2019 based on the grade of SAP utilized in the final product?

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

III-4. **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"/>	

III-5. **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"/>	

III-6. **Country preferences.**--Do you or your customers ever specifically order SAP from one country in particular over other possible sources of supply?

No	Yes	If yes, identify the countries and explain any preferences.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-7. **Importance of purchasing domestic product.**--Please fill out the table below, estimating the percentage of your firm's total 2021 purchases of SAP that required SAP produced in the United States.

	Estimated percentage of your firm's total 2021 purchases of SAP
Purchases that did not require domestic product	%
Purchases that were required by law or regulation to be domestic product (e.g., government purchases under "Buy American" provisions)	%
Purchases that were not required by law or regulation, but were required by your customers to be domestic product	%
Purchases that were required to be domestic product for other reasons (explain: _____)	%
Total (should sum to 100.0%)	0.0 %
If your answer is different for other periods (<i>i.e.</i> , 2019, 2020, or January-June 2022), please explain.	

- III-8. **Conditions of competition.**--

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

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) Have there been any changes in the business cycles or conditions of competition for SAP since January 1, 2019?

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

- III-9. **Decisions based on producer and country-of-origin.**--How often does your firm, and if known, do your customers, make purchasing decisions involving SAP based on its producer or country of origin?

Item	Always	Usually	Sometimes	Never	If at least sometimes, explain.
Decision based on producer					
Your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Your customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Decision based on country of origin					
Your firm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Your customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- III-10. **Availability of supply.**--Has the availability of SAP in the U.S. market changed since January 1, 2019?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Subject imports	<input type="checkbox"/>	<input type="checkbox"/>	
Nonsubject imports	<input type="checkbox"/>	<input type="checkbox"/>	

III-11. Supply constraints.—

- (a) Has any firm refused, declined, or been unable to supply your firm with SAP 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, etc.)?

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

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

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

III-12. Availability of specific product types.—Are certain grades/types/sizes of SAP only available from certain country sources?

No	Yes	If yes, please identify the countries and the grade/type/size.
<input type="checkbox"/>	<input type="checkbox"/>	

III-13. Purchasing frequency.--

- (a) How frequently does your firm make purchases of SAP (check one)?

Daily	Weekly	Monthly	Quarterly	Annually	Other	If other, specify
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- (b) Has this purchasing frequency changed since January 1, 2019?

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

III-14. **Raw material prices.**—

(a) Is your firm familiar with the prices for raw materials used in the production of SAP?

No	Yes – please answer (b)
<input type="checkbox"/>	<input type="checkbox"/>

(b) Has information on raw material prices affected your firm's negotiations or contracts to purchase SAP since 2019?

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

III-15. **Number of suppliers contacted.**--How many suppliers of SAP does your firm generally contact before making a purchase? Between ____ and ____ firms

III-16. **Supplier negotiations.**--Do your firm's purchases of SAP usually involve negotiations between supplier and purchaser?

No	Yes	If yes, explain the factors your firm generally negotiates and note whether your firm quotes competing prices during negotiations.
<input type="checkbox"/>	<input type="checkbox"/>	

III-17. **Change in suppliers.**--Has your firm changed suppliers since January 1, 2019?

No	Yes	If yes, please list the supplier(s), whether the firm was added or dropped, and the reasons for the change.
<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **New suppliers.**--Are you aware of any new suppliers, either foreign or domestic, that have entered the market since January 1, 2019?

No	Yes	If yes, please identify the firms.
<input type="checkbox"/>	<input type="checkbox"/>	

III-19. **Supplier qualification.**--Do you require your suppliers to be or to become certified or qualified to sell SAP to your firm?

If yes, provide the following information.

- The number of days to qualify a new supplier.
- A general description of the certification or qualification process. Also, a brief description of the factors that you consider when qualifying a new supplier (e.g., quality of product, reliability of supplier, etc.).

No	Yes	Number of days	Process and factors
<input type="checkbox"/>	<input type="checkbox"/>		

III-20. **Failure to certify.**--Since January 1, 2019, have any domestic or foreign producers failed in their attempts to certify or qualify their SAP with your firm or have any producers lost their approved status?

No	Yes	If yes, please identify these firms, the countries where they are located, and the reasons why they failed the certification/qualification.
<input type="checkbox"/>	<input type="checkbox"/>	

III-21. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase SAP (examples include availability, extension of credit, contracts, price, quality, range of supplier's product line, traditional supplier, etc.).

1.	
2.	
3.	
Please list any other factors that are very important in your purchase decisions: _____.	

- III-22. **Purchasing factors.**--Please rate the importance of the following factors in your firm's purchasing decisions for SAP.

Factor	Very important	Somewhat important	Not important
Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discounts offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minimum quantity requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Packaging	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product consistency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality meets industry standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality meets your firm's specifications and standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability of supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical support/service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
U.S. transportation costs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- III-23. **Quality characteristics.**--What characteristics does your firm consider when evaluating the quality of SAP?

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- III-24. **Minimum quality.**--How often does SAP from the following countries meet minimum quality specifications for your uses or your customers' uses?

Source	Always	Usually	Sometimes	Rarely or never	Don't know
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- III-25. **Frequency of decisions based on price.**--How often does your firm purchase the SAP that is offered at the lowest price?

Always	Usually	Sometimes	Never
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- III-26. **Price leaders.**--A price leader is defined as (1) one or more firms that initiate a price change, either upward or downward, that is followed by other firms, or (2) one or more firms that have a significant impact on prices. *A price leader is not necessarily the lowest-priced supplier.*

Please list the names of any firms you considered price leaders in the SAP market since January 1, 2019.

Firm(s)	Describe how the firm(s) exhibited price leadership

- III-27. **Interchangeability between grades and sources.**—

- (a) Can your firm substitute between different grades of SAP in the production of downstream products? Describe the factors and time involved in changing grades, including whether your firm considers different grades during contract negotiations.

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- (b) Can your firm substitute between the same grade of SAP produced by different suppliers in the production of downstream products? Describe any factors and time involved in changing suppliers for the same SAP grade, including how interchangeability is considered during contract negotiations.

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PART IV.—PRODUCT COMPARISONS

- IV-1. **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 which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:		

- IV-2. **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 purchases 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		
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 purchases of SAP, identify the country-pair and relevant factors and report the advantages or disadvantages imparted by such factors:		

IV-3. **Factor country comparisons.**--For the factors listed below, please rate how SAP produced in each country you identified in your response to the first question in Part IV compares with SAP produced in each of the other countries you identified.

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

Factor	Product from <u>United States</u> compared to product from <u>South Korea</u>			Product from <u>United States</u> compared to product from <u>Nonsubject countries</u>			Product from <u>South Korea</u> compared to product from <u>Nonsubject countries</u>		
	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discounts offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minimum quantity requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Packaging	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment terms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Price ¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product consistency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality meets industry standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality meets your firm's specifications and standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability of supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical support/service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
U.S. transportation costs ¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹ A rating of "superior" on price and U.S. transportation costs indicates that the first country generally has lower prices/U.S. transportation costs than the second country.

PART V.—ADDITIONAL INFORMATION

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

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

Hours	Dollars

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

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

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

https://www.usitc.gov/investigations/701731/2021/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 cindy.cohen@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 purchase this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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