

U.S. IMPORTERS' QUESTIONNAIRE

CERTAIN FREIGHT RAIL COUPLERS AND PARTS THEREOF FROM CHINA AND MEXICO

This questionnaire must be received by the Commission by **October 12, 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 and countervailing duty investigations concerning certain freight rail couplers and parts thereof ("freight rail couplers") from China and Mexico (Inv. Nos. 701-TA-682 and 731-TA-1592-1593 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

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

Has your firm imported freight rail couplers (as defined on next page) from any country 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: **RAIL**)

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 September 28, 2022, by McConway & Torley LLC, Pittsburgh, Pennsylvania, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC. Antidumping and countervailing duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2022/certain_freight_rail_coupler_systems_and/preliminary.htm.

Freight rail couplers covered by these investigations are certain freight railcar couplers (also known as "fits" or "assemblies") and parts thereof. Freight railcar couplers are composed of two main parts, namely knuckles and coupler bodies but may also include other items (e.g., coupler locks, lock lift assemblies, knuckle pins, knuckle throwers, and rotors). The parts covered by the investigation include: (1) E coupler bodies; (2) E/F coupler bodies; (3) F coupler bodies; (4) E knuckles; (5) F knuckles; as set forth by the Association of American Railroads (AAR). The freight rail coupler parts are included within the scope of the investigation when imported individually.

Subject freight railcar couplers and parts are included within the scope whether finished or unfinished, whether imported individually or with other subject or nonsubject parts, whether assembled or unassembled, whether mounted or unmounted, or if joined with nonsubject merchandise, such as other nonsubject parts or a completed railcar. Finishing includes, but is not limited to, arc washing, welding, grinding, shot blasting, heat treatment, machining, and assembly of various parts. When a subject coupler or subject parts are mounted on or to other nonsubject merchandise, such as a railcar, only the coupler or subject parts are covered by the scope.

The finished products covered by the scope of this investigation meet or exceed the AAR specifications of M-211, "Foundry and Product Approval Requirements for the Manufacture of Couplers, Coupler Yokes, Knuckles, Follower Blocks, and Coupler Parts" and/or AAR M-215 "Coupling Systems," or other equivalent domestic or international standards (including any revisions to the standard(s)).

The country of origin for subject couplers and parts thereof, whether fully assembled, unfinished or finished, or attached to a railcar, is the country where the subject coupler parts were cast or forged. Subject merchandise includes coupler parts as defined above that have been further processed or further assembled, including those coupler parts attached to a railcar in third countries. Further processing includes, but is not limited to, arc washing, welding, grinding, shot blasting, heat treatment, painting, coating, priming, machining, and assembly of various parts. The inclusion, attachment, joining, or assembly of nonsubject parts with subject parts or couplers either in the country of manufacture of the in-scope product or in a third country does not remove the subject parts or couplers from the scope.

Freight rail couplers are provided for in HTS subheading 8607.30.10. Unfinished subject merchandise (that does not have the essential character of a finished coupler) may also be reported under HTSUS statistical reporting number 7326.90.8688. Subject merchandise attached to finished railcars may be imported under HTSUS statistical reporting numbers 8606.10.0000, 8606.30.0000, 8606.91.0000, 8606.92.0000, 8606.99.0130, 8606.99.0160, or under heading 9803.00.50 if imported as an Instrument of International Traffic. Subject merchandise may also be imported under HTSUS subheading 7325.99.50.

The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

Importer.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing freight rail couplers (as defined above) into the United States from a foreign manufacturer or through its selling agent.

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.

Valid number error messages.--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Ahdia Bavari (202-205-3191, ahdia.bavari@usitc.gov).

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

- I-1. **OMB statistics.**--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 40 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

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

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

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- I-2b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

- I-2c. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

- I-3. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

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

Firm name	Country	Extent of ownership (percent)

“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-4. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing freight rail couplers from China and/or Mexico into the United States or that are engaged in exporting freight rail couplers from China and/or Mexico to the United States?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

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

☐ No ☐ Yes--List the following information.

[illegible]

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

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

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

Firm name	Address	Contact person and phone number

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

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

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

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

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

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

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Ahdia Bavari (202-205-3191, ahdia.bavari@usitc.gov). **Supply all data requested on a calendar-year basis.**

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

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of freight rail couplers since January 1, 2019.

<i>(check as many as appropriate)</i>		<i>(If checked, please describe the nature, date(s), and significance of any such reported changes as well as the business reasons for them; leave completely blank if not applicable)</i>
<input type="checkbox"/>	Office/warehouse openings	
<input type="checkbox"/>	Office/warehouse closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or importation curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Other (e.g., technology)	

- II-2b. **COVID-19 pandemic.**—Since January 1, 2020, has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, importation, employment, and shipments relating to freight rail couplers? 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) importation and shipment impact, and (c) employment impact of the COVID-19 pandemic.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-2c. **AD/CVD investigation on freight rail coupler systems from China: Provisional duties.**— Did the application of provisional AD/CVD duties as a result of the affirmative preliminary determination in Inv. Nos. 701-TA-670 and 731 TA-1570 and suspension of liquidation of goods subject to the Department of Commerce's preliminary antidumping and countervailing duty margins result in changes in your firm's supply chain arrangements, importation, employment, and shipments relating to freight rail couplers? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations, and how these duties are accounted for in Part II of this questionnaire.

No	Yes	If yes, describe these changes and describe how these duties are accounted for in Part II of this questionnaire.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of freight rail couplers for delivery after June 30, 2022?

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

No	Yes	If yes, fill out the table below.
<input type="checkbox"/>	<input type="checkbox"/>	

Source	Period			
	Jul-Sept 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023
	Quantity (in 1,000 pounds)			
China				
Mexico				
All other sources				

- II-3b. **Imports in the 12-month period preceding the petition.**--Has your firm imported freight rail couplers from any source between September 1, 2021 and August 31, 2022? (i.e., the last four months in 2021 and first eight months in 2022 combined)

No	Yes	If yes, report the quantity of such import below by source.
<input type="checkbox"/>	<input type="checkbox"/>	

Quantity (in 1,000 pounds)	
Source	September 2021 to August 2022
China	
Mexico	
All other sources	

- II-4. **Reasons for importing if producer.**--If your firm also produces freight rail couplers in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

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Definitions

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

"Import quantities" –Quantities reported should be net of returns.

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

"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.

"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-5a. **U.S. imports from China.**—Report your firm's imports and your firm's shipments and inventories of freight rail couplers imported from China by your firm during the specified periods. **Reminder:** Please ensure the data reported conforms to the scope of these investigations as listed on pg. 2 (e.g., covers in-scope freight rail couplers and parts thereof only, and does not include any out-of-scope freight rail coupler system parts). Please report the data based on the country of origin of the coupler fit/assembly and/or components, **not** the railcar or out-of-scope system parts to which they may have been attached.

China

Quantity (in 1,000 pounds), value (in \$1,000)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
Beginning-of-period inventories (quantity) (A)					
Imports:¹					
Standalone coupler fits or parts:					
Quantity (B)					
Value (C)					
Attached to new railcars or other out-of-scope system parts:²					
Quantity (D)					
Value (E)					
U.S. shipments:					
Commercial shipments:					
Quantity (F)					
Value (G)					
Internal consumption:³					
Quantity (H)					
Value ² (I)					
Transfers to related firms:³					
Quantity (J)					
Value ² (K)					
Export shipments:⁴					
Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					

¹ Please identify the foreign producers, if known: _____.

² Describe the out-of-scope products to which the freight rail coupler is attached at the time of importation: _____.

³ 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.

⁴ Identify your firm's principal export markets: _____.

II-5a. U.S. imports from China.--Continued

***RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.**--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.*

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-5b. Channels of distribution: China.--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution during the specified periods.

China

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
	Quantity (in 1,000 pounds)				
Channels of distribution:					
U.S. shipments:					
To the OEM market (O)					
To the replacement market (P)					

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

- II-5c. **U.S. shipments by product type: China.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by product type during the specified periods.

China

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
U.S. shipments:					
<u>Freight rail coupler fit:</u>					
Quantity in 1,000 pounds (Q)					
Value in \$1,000 (R)					
<u>Freight rail coupler components:</u>					
Knuckles					
Quantity in 1,000 pounds (S)					
Value in \$1,000 (T)					
Coupler bodies					
Quantity in 1,000 pounds (U)					
Value in \$1,000 (V)					

RECONCILIATION OF US SHIPMENTS.—Please ensure that the quantities (in 1,000 pounds) and values reported for U.S. shipments in this question (i.e., lines Q through V) in each time period equal the quantity and values reported for U.S. shipments in part "a" of this question (i.e., lines F through J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
Quantity: $Q + S + U - F - H - J = \text{zero ("0")}$, if not revise	0	0	0	0	0
Value: $R + T + V - G - I - K = \text{zero, ("0")}$, if not revise.	0	0	0	0	0

II-6a. **U.S. imports from Mexico.**—Report your firm's imports and your firm's shipments and inventories of freight rail couplers imported from Mexico by your firm during the specified periods.

Reminder: Please ensure the data reported conforms to the scope of these investigations as listed on pg. 2 (e.g., covers in-scope freight rail couplers and parts thereof only, and does not include any out-of-scope freight rail coupler system parts). Please report the data based on the country of origin of the coupler fit/assembly and/or components, **not** the railcar or out-of-scope system parts to which they may have been attached.

Mexico

Quantity (in 1,000 pounds), value (in \$1,000)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
Beginning-of-period inventories (quantity) (A)					
Imports:¹					
Standalone coupler fits or parts:					
Quantity (B)					
Value (C)					
Attached to new railcars or other out-of-scope system parts:²					
Quantity (D)					
Value (E)					
U.S. shipments:					
Commercial shipments:					
Quantity (F)					
Value (G)					
Internal consumption:³					
Quantity (H)					
Value ² (I)					
Transfers to related firms:³					
Quantity (J)					
Value ² (K)					
Export shipments:⁴					
Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					

¹ Please identify the foreign producers, if known: _____.

² Describe the out-of-scope products to which the freight rail coupler is attached at the time of importation: _____.

³ 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.

⁴ Identify your firm's principal export markets: _____.

II-6a. **U.S. imports from Mexico.—Continued**

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
$A + B + D - F - H - J - L - N =$ should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

- II-6b. **Channels of distribution: Mexico.**--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Mexico by channel of distribution during the specified periods.

Mexico

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
Quantity (in 1,000 pounds)					
Channels of distribution:					
U.S. shipments:					
To the OEM market (O)					
To the replacement market (P)					

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

- II-6c. **U.S. shipments by product type: Mexico.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Mexico by product type during the specified periods.

Mexico

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
U.S. shipments:					
<u>Freight rail coupler fit:</u>					
Quantity in 1,000 pounds (Q)					
Value in \$1,000 (R)					
<u>Freight rail coupler components:</u>					
Knuckles					
Quantity in 1,000 pounds (S)					
Value in \$1,000 (T)					
Coupler bodies					
Quantity in 1,000 pounds (U)					
Value in \$1,000 (V)					

RECONCILIATION OF US SHIPMENTS.—Please ensure that the quantities (in 1,000 pounds) and values reported for U.S. shipments in this question (i.e., lines Q through V) in each time period equal the quantity and values reported for U.S. shipments in part "a" of this question (i.e., lines F through J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
Quantity: $Q + S + U - F - H - J = \text{zero ("0")}$, if not revise	0	0	0	0	0
Value: $R + T + V - G - I - K = \text{zero, ("0")}$, if not revise.	0	0	0	0	0

- II-7a. **U.S. imports from All other sources.**—Report your firm's imports and your firm's shipments and inventories of freight rail couplers imported from all other sources by your firm during the specified periods. **Reminder:** Please ensure the data reported conforms to the scope of these investigations as listed on pg. 2 (e.g., covers in-scope freight rail couplers and parts thereof only, and does not include any out-of-scope freight rail coupler system parts). Please report the data based on the country of origin of the coupler fit/assembly and/or components, **not** the railcar or out-of-scope system parts to which they may have been attached.

All other sources

Quantity (in 1,000 pounds), value (in \$1,000)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
Beginning-of-period inventories (quantity) (A)					
Imports:¹					
Standalone coupler fits or parts:					
Quantity (B)					
Value (C)					
Attached to new railcars or					
other out-of-scope system					
parts:²					
Quantity (D)					
Value (E)					
U.S. shipments:					
Commercial shipments:					
Quantity (F)					
Value (G)					
Internal consumption:³					
Quantity (H)					
Value ² (I)					
Transfers to related firms:³					
Quantity (J)					
Value ² (K)					
Export shipments:⁴					
Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					

¹ Please identify the foreign producers, if known: _____.

² Describe the out-of-scope products to which the freight rail coupler is attached at the time of importation: _____.

³ 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.

⁴ Identify your firm's principal export markets: _____.

II-7a. **U.S. imports from All other sources.**—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.—Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-7b. **Channels of distribution: All other sources.**—Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution during the specified periods.

All other sources

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
	Quantity (in 1,000 pounds)				
Channels of distribution:					
U.S. shipments:					
To the OEM market (O)					
To the replacement market (P)					

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

- II-7c. **U.S. shipments by product type: All other sources.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by product type during the specified periods.

All other sources

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
U.S. shipments:					
<u>Freight rail coupler fit:</u>					
Quantity in 1,000 pounds (Q)					
Value in \$1,000 (R)					
<u>Freight rail coupler components:</u>					
Knuckles					
Quantity in 1,000 pounds (S)					
Value in \$1,000 (T)					
Coupler bodies					
Quantity in 1,000 pounds (U)					
Value in \$1,000 (V)					

RECONCILIATION OF US SHIPMENTS.—Please ensure that the quantities (in 1,000 pounds) and values reported for U.S. shipments in this question (i.e., lines Q through V) in each time period equal the quantity and values reported for U.S. shipments in part "a" of this question (i.e., lines F through J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
Quantity: $Q + S + U - F - H - J = \text{zero ("0")}$, if not revise	0	0	0	0	0
Value: $R + T + V - G - I - K = \text{zero, ("0")}$, if not revise.	0	0	0	0	0

- II-8. **Semi-finished product analysis.**--Please answer the following questions regarding the differences and similarities in unfinished product(s) and finished product(s) in this proceeding as defined below:

“Finished product(s)” = “Coupler fit/assembly” – A coupler fit/assembly is usually comprised of at least two components, namely, knuckles and coupler bodies but may also include other items (e.g., coupler locks, lock lift assemblies, knuckle pins, knuckle throwers, and rotors).

“Unfinished product(s)”= “Freight rail coupler component” – An in-scope component of a freight rail coupler (e.g., knuckles and/or coupler bodies) shipped as an individual component or series of components comprising less than a finished coupler.

- (a) Are there uses for the unfinished product(s) other than for the production of the finished product(s)?

No	Yes	If yes--Please describe these uses.
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) Is the market for unfinished product(s) separate and distinct from the market for finished product(s)?

No	Yes	If yes--Please describe how they are separate and distinct.
<input type="checkbox"/>	<input type="checkbox"/>	

- (c) Are there differences in the physical characteristics and functions of the unfinished product(s) and finished products(s)?

No	Yes	If yes--Please describe these differences.
<input type="checkbox"/>	<input type="checkbox"/>	

- (d) Is there a significant difference in the cost or value between unfinished product(s) and finished product(s)?

No	Yes	If yes--Please describe these differences.
<input type="checkbox"/>	<input type="checkbox"/>	

- (e) Would you describe the processes used to transform the unfinished product(s) into the finished product(s) as significant and particularly labor or capital intensive?

No	Yes	If yes--Please describe the labor or capital intensively of the conversion process.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-9. **Transfers to related firms.**--If your firm reported transfers to related firms in any of the data tables in part II, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary) and whether the transfers were priced at market value or by a non-market formula.

--

- II-10. **Other explanations.**--If your firm would like to further explain a response to a question in Part II 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.

--

PART III.--PRICING AND MARKET FACTORS

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

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

Name	
Title	
Email	
Telephone	

PRICE DATA

- III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2019 of the following products your firm imported from China and/or Mexico.

Product 1.-- SE60, Grade E steel coupler (also known as an "assembly" or a "fit"), double shelves, 21.5" shank length, produced to AAR M-211 and/or AAR M-215 specifications.

Product 2.--E50 coupler knuckle, grade E steel, produced to AAR M-211 and/or AAR M-215 specifications.¹

Product 3.--SBE60 coupler body, grade E steel, produced to AAR M-211 and/or AAR M-215 specifications.²

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).

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

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

¹ Pricing product 2 is an individual knuckle sold separately from a coupler "assembly" or "fit". Do not report or include knuckles sold as part of a coupler "assembly" or "fit".

² Pricing product 3 is an individual coupler body sold separately from a coupler "assembly" or "fit". Do not report or include coupler bodies sold as part of a coupler "assembly" or "fit".

III-2a. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm.

China

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

(Quantity in pounds, value in dollars)						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
2019:						
January-March						
April-June						
July-September						
October-December						
2020:						
January-March						
April-June						
July-September						
October-December						
2021:						
January-March						
April-June						
July-September						
October-December						
2022:						
January-March						
April-June						

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

² Pricing product definitions are provided on the first page of Part III.

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

Product 1:

Product 2:

Product 3:

III-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² imported from Mexico and sold by your firm.

Mexico

Report data in **pounds** and **actual dollars** (not 1,000s).

(Quantity in pounds, value in dollars)						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
2019:						
January-March						
April-June						
July-September						
October-December						
2020:						
January-March						
April-June						
July-September						
October-December						
2021:						
January-March						
April-June						
July-September						
October-December						
2022:						
January-March						
April-June						

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

² Pricing product definitions are provided on the first page of Part III.

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

Product 1:

Product 2:

Product 3:

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

Are the price data reported above:	✓ if Yes
In actual dollars (not \$1,000) for value data?	<input type="checkbox"/>
In actual pounds (not 1,000s of pounds) for quantity data?	<input type="checkbox"/>
Exclude merchandise sold attached to out-of-scope downstream merchandise (e.g., already attached to a railcar)	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include inland transport transportation costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have discounts, rebates, and returns been deducted from gross sales in the quarter in which the sale occurred?	<input type="checkbox"/>
Quantities do not exceed commercial shipments reported in part II in each year?	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

III-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.

III-3. **Price setting.**--How does your firm determine the prices that it charges for sales of freight rail couplers (*check all that apply*)?

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

III-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"/>	

III-5. **Pricing terms.**--On what basis are your firm's prices of imported freight rail couplers from China and/or Mexico usually quoted (*check one*)?

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

III-6. **Contract versus spot.**-- Approximately what shares of your firm's sales of its U.S.-produced freight rail couplers in 2021 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

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 %

III-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for freight rail couplers imported from China and/or Mexico (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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
¹ Please identify the indexes used: _____.				

III-8. **Lead times.**-- What is your firm's share of sales of freight rail couplers imported from China and/or Mexico 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 freight rail couplers?

Source	Share of 2021 sales	Lead time (Average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

III-9. **Shipping information.**--

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

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

- III-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold freight rail couplers imported from subject countries since January 1, 2019 (check all that apply)?

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

- III-11. **Inland transportation costs.**—What is the approximate percentage of the cost of freight rail couplers imported from China and/or Mexico that is accounted for by U.S. inland transportation costs? _____ percent.

III-12. **End uses.**--List the end uses of the freight rail couplers that your firm imports. For each end-use product, what percentage of the total cost is accounted for by freight rail couplers and other inputs?

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

III-13. **Substitutes.**--Can other products be substituted for freight rail couplers?

☐ 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 freight rail couplers?		
		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-14. **Demand trends.**-- Indicate how demand within the United States and outside of the United States (if known) for freight rail couplers has changed since January 1, 2019. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- III-15. **Product changes.**--Have there been any significant changes in the product range, product mix or marketing of freight rail couplers since January 1, 2019?

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

- III-16. **Conditions of competition.**—Is the freight rail couplers market subject to business cycles and/or other conditions of competition distinctive to freight rail couplers?

Check all that apply.	Please describe, including any changes since January 1, 2019.
<input type="checkbox"/> No	Skip to the next question.
<input type="checkbox"/> Yes-Business cycles (e.g., seasonal business)	
<input type="checkbox"/> Yes-Other distinctive conditions of competition	

- III-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply freight rail couplers at any time since January 1, 2019 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

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

III-18. **Raw materials.**--

(a) How have freight rail couplers raw material costs changed since January 1, 2019?

Factor	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 freight rail couplers.
Cost of raw materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) How did the imposition of tariffs under section 232 on imported steel/aluminum products impact raw material costs for freight rail couplers?

Factor	Overall increase	No change	Overall decrease	Fluctuate with no clear trend
Cost of raw materials after section 232 tariffs imposed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(c) How did the imposition of tariffs under section 232 on imported steel/aluminum products impact your firm's sales price for freight rail couplers?

Factor	Overall Increase	No change	Overall Decrease	Fluctuate with no clear trend	Explanation
Prices for freight rail couplers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-19. **Role of section 301 tariffs.**-- Did the tariffs on Chinese-origin products under section 301, or changes in these tariffs, have an impact on the freight rail couplers market in the United States, including any effects on freight rail couplers cost, price, supply, and/or demand, since January 1, 2019?

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

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

--

III-20. **Interchangeability.**--Are freight rail couplers produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	Mexico	Other countries
United States			
China			
Mexico			
For any country-pair producing freight rail couplers that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of freight rail couplers produced in the countries:			

III-21. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between freight rail couplers produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	Mexico	Other countries
United States			
China			
Mexico			
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 freight rail couplers, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:			

III-22. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for freight rail couplers since January 1, 2019. Indicate the share of the quantity of your firm's U.S. shipments of freight rail couplers that each of these customers accounted for in 2021.

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

III-23. **Other explanations.**--If your firm would like to further explain a response to a question in Part III 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.

PART IV.-- COMPARABILITY OF FREIGHT RAIL COUPLERS AND OTHER FREIGHT RAIL COUPLER SYSTEM COMPONENTS

IV-1. **Comparability of in-scope freight rail couplers and out-of-scope freight rail coupler system components.**--For each of the following indicate whether listed products are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.

"In-scope freight rail couplers" – Domestically-produced freight rail couplers that correspond to the scope of this investigation as described on pg. 2 of this questionnaire (*e.g.*, coupler fits/assemblies, knuckles, coupler bodies).

"Out-of-scope freight rail coupler system components" – Domestically-produced components of a full freight rail coupler system that are not covered under the scope of these investigations (*e.g.*, follower blocks, yokes, etc.)

F: fully comparable or the same, *i.e.*, have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

O: no familiarity with products.

(a) **Physical Characteristics and End Uses.**--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u><i>physical characteristics and uses</i></u> :
In-scope freight rail couplers vs out-of-scope freight rail coupler system components		

(b) **Interchangeability.**--The ability to substitute the products in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u><i>interchangeability</i></u> :
In-scope freight rail couplers vs out-of-scope freight rail coupler system components		

- (c) **Channels of distribution**--Channels of distribution/market situation through which the products are sold (i.e., sold direct to end users, through wholesaler/distributors, etc.).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>channels of distribution</u> :
In-scope freight rail couplers vs out-of-scope freight rail coupler system components		

- (d) **Manufacturing facilities, production processes, and production employees**--Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>manufacturing facilities, production processes, and production employees</u> :
In-scope freight rail couplers vs out-of-scope freight rail coupler system components		

- (e) **Customer and producer perceptions**--Perceptions as to the differences and/or similarities in the market (e.g., sales/marketing practices).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>customer and product perceptions</u> :
In-scope freight rail couplers vs out-of-scope freight rail coupler system components		

- (f) **Price**--Whether prices are comparable or differ between the products.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>price</u> :
In-scope freight rail couplers vs out-of-scope freight rail coupler system components		

- IV-2. **Expansion of the domestic like product.**— The merchandise currently under investigation in these investigations is freight rail coupler fits/assemblies and parts thereof. If you believe the Commission should (or should not) expand its analysis to include freight rail car coupler systems and components thereof as defined in the prior investigation (*Freight Rail Coupler Systems and Components from China*, Inv. Nos. 701-TA-670 and 731 TA-1570 (Final), product description available https://www.usitc.gov/sites/default/files/publications/701_731/pub5331.pdf, pp. I-6-7), please explain your position below. Be sure to address the six factors listed in question IV-1 (physical characteristics and end uses; interchangeability; channels of distribution; manufacturing facilities, production processes, and production employees; customer and producer perceptions; and, price) in your response.

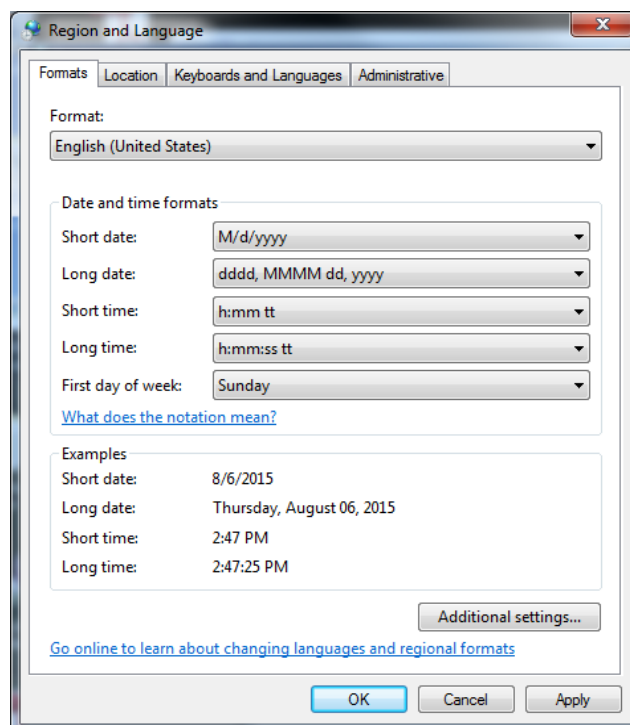
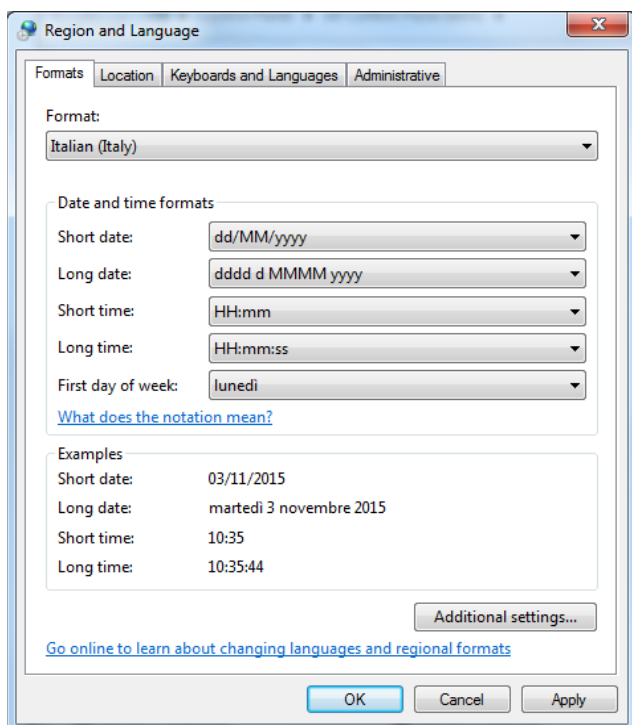
Correcting valid number error messages.--If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (i.e., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in the numeric form fields.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

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

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

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

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



HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

https://www.usitc.gov/investigations/701731/2022/certain_freight_rail_coupler_systems_and/preliminary.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:** **RAIL**

- **E-mail.**—E-mail the MS Word questionnaire to ahdia.bavari@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 did not import this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

Parties to this proceeding.—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission’s Secretary (202-205-1802). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7).