

**U.S. PRODUCERS' QUESTIONNAIRE**  
**EMULSION STYRENE-BUTADIENE RUBBER**  
**FROM BRAZIL, MEXICO, POLAND, AND SOUTH KOREA**

This questionnaire must be received by the Commission by **March 17, 2023**  
*See last page for filing instructions.*

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its review of the antidumping duty orders concerning emulsion styrene-butadiene rubber ("ESBR") from Brazil, Mexico, Poland, and South Korea (Inv. Nos. 731-TA-1334-1337 (Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

<b>Name of firm</b> _____		
<b>Address</b> _____		
<b>City</b> _____	<b>State</b> _____	<b>Zip Code</b> _____
<b>Website</b> _____		
Has your firm produced ESBR (as defined on the next page) at any time since January 1, 2017?		
<input type="checkbox"/> <b>NO</b>	(Sign the certification below and promptly return only this page of the questionnaire to the Commission)	
<input type="checkbox"/> <b>YES</b>	(Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)	
<b>Return questionnaire via the Commission Drop Box by clicking on the following link:</b> <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> (PIN: <b>ESBR</b> )		

**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 or reviews conducted by the Commission on the same or similar merchandise.*

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

<i>Name of Authorized Official</i>	<i>Title of Authorized Official</i>	<i>Date</i>
<i>Signature</i>	<i>Phone</i>	<i>Email address</i>

**PART I.—GENERAL INFORMATION**

**Background.**-- On September 12, 2017, the Department of Commerce ("Commerce") issued antidumping duty orders on imports of ESBR from Brazil, Mexico, Poland, and South Korea. On August 1, 2022, the Commission instituted reviews pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the orders will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the orders. Questionnaires and other information pertinent to this proceeding are available at <https://ids.usitc.gov/case/4440/investigation/8258>.

**ESBR** covered by the reviews is cold-polymerized emulsion styrene-butadiene rubber. The scope of the reviews includes, but is not limited to, ESBR in primary forms, bales, granules, crumbs, pellets, powders, plates, sheets, strip, etc. ESBR consists of non-pigmented rubbers and oil-extended non-pigmented rubbers, both of which contain at least one percent of organic acids from the emulsion polymerization process.

ESBR is produced and sold in accordance with a generally accepted set of product specifications issued by the International Institute of Synthetic Rubber Producers (IISRP). The scope of the reviews covers grades of ESBR included in the IISRP 1500 and 1700 series of synthetic rubbers. The 1500 grades are light in color and are often described as "Clear" or "White Rubber." The 1700 grades are oil-extended and thus darker in color, and are often called "Brown Rubber."

Specifically excluded from the scope of these reviews are products which are manufactured by blending ESBR with other polymers, high styrene resin master batch, carbon black master batch (i.e., IISRP 1600 series and 1800 series) and latex (an intermediate product).

ESBR is currently imported under statistical reporting numbers 4002.19.0015 and 4002.19.0019 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

**Reporting of information.**--If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates. If your firm is completing more than one questionnaire in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions in the questionnaires.

**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 of your files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

**Release of information.**--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

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

I-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 50 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

- I-2a. **Establishments covered.**--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

***“Establishment”***--Each facility of a firm involved in the production of ESBR, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments Covered <sup>1</sup>	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
<sup>1</sup> Additional discussion on establishments consolidated in this questionnaire: _____			

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

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

Law firm:	
Lead attorney(s):	

- I-3. **Position regarding continuation of orders.**--Does your firm support or oppose continuation of the following antidumping duty orders currently in place for ESBR?

Country	Order type	Support	Oppose	Take no position
Brazil	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mexico	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poland	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-4. **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-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing ESBR into the United States or that are engaged in exporting ESBR to the United States?

☐ No      ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of ESBR?

☐ No      ☐ Yes--List the following information.

[illegible]

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

Further information on this part of the questionnaire can be obtained from Tyler Berard (202-205-3354, [Tyler.Berard@usitc.gov](mailto:Tyler.Berard@usitc.gov)). **Supply all data requested on a calendar-year basis.**

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

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of ESBR since January 1, 2017.

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

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

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

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

<b>No</b>	<b>Yes</b>	<b>If yes, supply details as to the time, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

- II-2d. **Natural disasters and similar disruptions.** —Have natural disasters and/or other similar disruptions (*e.g.*, fires, explosions) since January 1, 2017, led to any shutdowns, stoppages, or curtailments in the functioning of your facilities, or your suppliers' facilities, so as to affect your firm's supply chain arrangements, production, and/or shipments?

<b>No</b>	<b>Yes</b>	<b>If yes, describe these changes including a separate discussion of the (a) supply chain impact and (b) production and shipments impact. Include in this discussion an indication of the timing and duration or the impacts and whether and how your firm adapted to these impacts.</b>
<input type="checkbox"/>	<input type="checkbox"/>	



- II-3a. **Production using same machinery.**--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce ESBR, and the combined production capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

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

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

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

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

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

II-3a. Production using same machinery.—Continued

Quantity (in 1,000 pounds)						
Item	Calendar year					
	2017	2018	2019	2020	2021	2022
<b>Capacity measures:</b>						
<b>Installed overall</b> production capacity <sup>1</sup>						
<b>Practical overall</b> production capacity <sup>1 2</sup>						
<b>Practical ESBR</b> production capacity <sup>3 4</sup>	0	0	0	0	0	0
<b>Production of:</b>						
ESBR <sup>3 4</sup>	0	0	0	0	0	0
Other out-of-scope products:						
Carbon black master batch (CBMB)						
Solution styrene-butadiene rubber (SSBR)						
Hot polymerized ESBR						
Other products <sup>5</sup>						
Subtotal, all out-of-scope products	0	0	0	0	0	0
Total production using same machinery or workers	0	0	0	0	0	0

<sup>1</sup> Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period.

<sup>2</sup> Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" overall production capacity and "practical" overall production capacity.

<sup>3</sup> Practical ESBR capacity and production will be auto-populated in table once reported in question II-6.

<sup>4</sup> Data reported for practical ESBR production capacity should be greater than the data reported for production of ESBR in each period, if not revise prior to submission to the Commission. Additionally, if your firm reports the production of no other products on the same machinery and using the same workers as ESBR then "practical overall" and "practical ESBR" capacity measures should be equal to each other.

<sup>5</sup> Please identify these products: \_\_\_\_\_.

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

Hours per week	Weeks per year

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

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

Constraint (check as many as appropriate)		Description (If checked, please describe the details, timing, and duration of the constraint; leave completely blank if not applicable)
<input type="checkbox"/>	Production bottlenecks	
<input type="checkbox"/>	Existing labor force	
<input type="checkbox"/>	Supply of material inputs	
<input type="checkbox"/>	Fuel or energy	
<input type="checkbox"/>	Storage capacity	
<input type="checkbox"/>	Logistics/transportation	
<input type="checkbox"/>	Other constraints (list the specific constraints in the description field)	

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

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

- II-3g. **Actual impact of structural, or temporary, practical production constraints.**—Please describe the actual impact of the structural, or temporary, practical production constraints described above in II-3d with respect to your ability to timely or further supply downstream customers with additional volumes of ESBR (e.g., actual impact on supply continuity to customers).

- II-3h. **On-site storage capabilities.**--Please describe your on-site storage capabilities with respect to storing, and drawing upon, on-site inventory of: (a) the main monomer inputs used to produce ESBR (i.e., butadiene, styrene) and (b) finished goods which can be used to supply downstream customers.

(a) Main monomer inputs (i.e., butadiene, styrene)

(b) Finished goods

- II-3i. **On-time delivery rate.**—What was the approximate percentage of your shipments which were delivered on-time in 2022 (i.e., within 5 business days of the initial scheduled delivery date)? \_\_\_\_\_ percent.

**II-4. Product shifting.—**

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

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

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

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- II-5. Capacity checklist.—**Please check that the capacity numbers reported in question II-3a follow the Commission's relevant definitions for capacity.

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

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

- II-6. **Production, shipments, and inventory data.**--Report you firm's uses (shipment or storage) of domestically produced ESBR during the specified periods.

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

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

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

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

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

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

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

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

Quantity ( <i>in 1,000 pounds</i> ) and value ( <i>in \$1,000</i> )						
Item	Calendar year					
	2017	2018	2019	2020	2021	2022
<b>Practical ESBR production capacity</b> ( <i>Quantity</i> ) (A)						
<b>Beginning-of-period inventories</b> ( <i>Quantity</i> ) (B)						
<b>Production</b> (C)						
<b>U.S. shipments:</b>						
<b>Commercial shipments:</b>						
<i>Quantity</i> (D)						
<i>Value</i> (E)						
<b>Internal consumption:</b> <sup>1</sup>						
<i>Quantity</i> (F)						
<i>Value</i> (G)						
<b>Transfers to related firms:</b> <sup>1</sup>						
<i>Quantity</i> (H)						
<i>Value</i> (I)						
<b>Export shipments:</b> <sup>2</sup>						
<i>Quantity</i> (J)						
<i>Value</i> (K)						
<b>End-of-period inventories:</b>						
<i>Quantity</i> (L)						

<sup>1</sup> Report you firm's practical ESBR capacity consistent with the definitions and instructions provided in question II-3 above.

<sup>2</sup> Identify your firm's principal export markets: \_\_\_\_\_.

II-6. **Production, shipment, and inventory data.**--Continued

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

Item	Calendar year					
	2017	2018	2019	2020	2021	2022
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.						

II-7. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

Quantity (in 1,000 pounds)						
Item	Calendar year					
	2017	2018	2019	2020	2021	2022
<b>Channels of distribution:</b>						
<b>U.S. shipments:</b>						
To distributors (M)						
To tire manufacturers (N)						
To other end users (O)						

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, and O) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year					
	2017	2018	2019	2020	2021	2022
M + N + O – D – F – H = zero ("0"), if not revise.	0	0	0	0	0	0



- II-8a. **U.S. shipments by product type.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by product type in calendar year 2022.

Quantity (in 1,000 pounds)	
Item	Calendar year
	2022
<b>U.S. shipments of:</b>	
1500-series ESBR (P)	
1700-series ESBR (Q)	
All in-scope series ESBR	0

***RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE.**--Please ensure that the quantity reported for U.S. shipments by product type (i.e., lines P and Q) equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in 2022. 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
	2022
$P + Q - D - F - H = \text{zero ("0")}$ , if not revise.	0

- II-8b. **U.S. shipments by product type.**—Please indicate all grades of ESBR included in your firm's U.S. shipments in calendar year 2022 (check all that apply):

**1500-series ESBR**

- ☐ 1500  
☐ 1502  
☐ 1507  
☐ 1509  
☐ Other: \_\_\_\_.

**1700-series ESBR**

- ☐ 1712  
☐ 1721  
☐ 1723  
☐ 1732  
☐ 1739  
☐ 1745  
☐ 1763  
☐ 1769  
☐ 1778  
☐ 1783  
☐ 1789  
☐ 1793  
☐ 1799  
☐ Other: \_\_\_\_.

- II-9a. **Captive production use.** — Please report the quantity of your firm's internal consumption and/or transfers to related firms for the uses identified below. These data should reconcile with the quantity reported in question II-6 (lines F and H).

Quantity (in 1,000 pounds)						
Item	Calendar year					
	2017	2018	2019	2020	2021	2022
Internal consumption and/or transfers to related firms.— Sold as is, i.e., as ESBR (merchandise was diverted back into the market for ESBR)						
Processed into downstream products <sup>1</sup>						
<sup>1</sup> Please identify these products: _____.						

**RECONCILIATION OF CAPTIVE PRODUCTION USE.** — The sum of the data reported above should be equal to the sum of the data reported in lines F and H of question II-6 for all periods.

Reconciliation	Calendar year					
	2017	2018	2019	2020	2021	2022
Internal consumption and/or transfers to related firms (lines F and H in question II-6) reconciliation.	0	0	0	0	0	0
These data should reconcile with the quantities reported in question II-7 (lines F and H). If not, please revise.						

- II-9b. **ESBR share contribution to downstream products.** — If your firm reported that your firm's ESBR was used in the production of downstream products, please provide the following data on the share that ESBR and other inputs account for in the production of these downstream products. When providing the share of value/costs estimates below, do not include conversion costs (e.g., labor, factory overhead).

Material inputs used in downstream production	Share of <u>value/costs</u> (percent)	Share of the <u>weight</u> (percent)
ESBR		
All other material inputs		
<b>Total</b> (should sum to 100.0%)	0.0	0.0

- II-10. **Employment data.**--Report your firm's employment-related data related to the production of ESBR and provide an explanation for any trends in these data.

**"Production and Related Workers" (PRWs)** includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12.

**"Hours worked"** includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

**"Wages paid"** --Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar year					
	2017	2018	2019	2020	2021	2022
<b>Employment data:</b> Average number of PRWs ( <i>number</i> )						
Hours worked by PRWs ( <i>1,000 hours</i> )						
Wages paid to PRWs ( <i>\$1,000</i> )						

Explanation of trends:

- II-11. **Transfers to related firms.**--If your firm reported transfers to related firms in question II-6, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

**“Import”**—A transaction to buy from a foreign supplier where your firm is the importer of record.

No	Yes	If yes-- Report such purchases in the table below and explain the reasons for your firms' purchases:
<input type="checkbox"/>	<input type="checkbox"/>	

*Note:* If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below

Quantity (in 1,000 pounds)						
Item	Calendar year					
	2017	2018	2019	2020	2021	2022
<b>Purchases from U.S. importers<sup>1</sup> of ESRB from—</b>						
Brazil						
Mexico						
Poland						
South Korea						
Subject sources	0	0	0	0	0	0
All other sources						
<b>Purchases from domestic producers<sup>2</sup></b>						
<b>Purchases from other sources<sup>3</sup></b>						
All sources	0	0	0	0	0	0

<sup>1</sup> Please list the name of the importer(s) from which your firm purchased this product. If your firm's import suppliers differ by source, please identify the source for each listed supplier: \_\_\_\_.

<sup>2</sup> Please list the name of the U.S. producer(s) from which your firm purchased this product: \_\_\_\_.

<sup>3</sup> Please list the name of the firm(s) from which your firm purchased this product: \_\_\_\_.

- II-13. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of ESBR from Brazil, Mexico, Poland, and/or South Korea at any time since January 1, 2017, report those purchases by the individual importer of record and subject source.

## Purchases of subject imports

Quantity (in 1,000 pounds)							
Importer of record	Subject source	Calendar year					
		2017	2018	2019	2020	2021	2022
Total purchases from subject sources		0	0	0	0	0	0

II-13. **Purchases of imports from subject sources.**—*Continued.*

**RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES.**--Please ensure that the quantities reported for your firm's purchases of imports from subject sources reported in this question (i.e., "total purchases of imports from subject sources") in each time period equal the quantity reported for your firm's purchases from subject sources in each time period in the previous question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year					
	2017	2018	2019	2020	2021	2022
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0	0	0	0

II-14. **Imports.**--Since January 1, 2017, has your firm imported ESBR?

**"Importer"** – The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf.

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

II-15. **Toll production.**--Since January 1, 2017, has your firm been involved in a toll agreement regarding the production of ESBR?

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

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

II-16. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce ESBR in and/or admit ESBR into a foreign trade zone (FTZ)?

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

No	Yes	If yes—Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) **Other firms' FTZ operations.**--To your knowledge, do any firms in the United States import ESBR into a foreign trade zone (FTZ) for use in distribution of ESBR and/or the production of downstream articles?

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

**For questions II-17 and II-18, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.**

- II-17. **Effect of orders.**--Describe the significance of the existing antidumping duty orders covering imports of ESBR from Brazil, Mexico, Poland, and South Korea in terms of its effect on your firm's production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the orders.

--

- II-18. **Likely impact of revocation.**--Would your firm anticipate any changes in the character of its operations or organization, including its production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of ESBR in the future if the antidumping duty orders on ESBR from Brazil, Mexico, Poland, and South Korea were to be revoked?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and describe the underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-19. **Other explanations:**--If your firm would like to explain further a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--



**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to David Boyland (202-708-4725, [David.Boyland@usitc.gov](mailto:David.Boyland@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

- III-2. **Accounting system.**—Briefly describe your firm's financial accounting system.

- A. When does your firm's fiscal year end (month and day)? \_\_\_\_\_  
If your firm's fiscal year changed since January 1, 2017, explain below:

\_\_\_\_\_

- A.2. Note: Calendar-year data are requested for the annual-year financial data in this section (i.e., in questions III-9a, III-9e, III-12a, and III-13a).

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include ESBR:

\_\_\_\_\_

- B.2. Does your firm prepare profit/loss statements for ESBR:

☐ Yes ☐ No

- B.3. Please indicate the type and frequency (if applicable) of financial statements prepared by your firm. Please check relevant items below.

Financial statements	Check all that apply	Frequency			
		Monthly	Quarterly	Semi-annually	Annually
Audited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unaudited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual reports	<input type="checkbox"/>				
SEC Forms 10-K / 10-Q	<input type="checkbox"/>				
SEC Form 20-F	<input type="checkbox"/>				
Other (specify): _____	<input type="checkbox"/>				

B.4. Please indicate the primary accounting basis used by your firm.

Accounting basis	Check one
U.S. GAAP	<input type="checkbox"/>
IFRS	<input type="checkbox"/>
Tax – cash	<input type="checkbox"/>
Tax – accrual	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>

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

--

III-4. **Product listing.**—Please list the products your firm produces in the facilities in which it produces ESBR, and provide the share of net sales accounted for by these products in 2022.

Products	Share of sales in 2022
ESBR	%
	%
	%
	%
	%

- III-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of ESBR from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

☐ Yes--Continue to question III-7.      ☐ No--Continue to question III-8.

- III-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of ESBR that your firm purchases from related suppliers and that are reflected in question III-9a. For “Share of total COGS” please report this information by relevant input for 2022.

Input	Related supplier	Share of total COGS in 2022
		%
		%
		%
		%

- III-7a. **Inputs from related suppliers valuation method.**—Please indicate the purchase cost valuation method used for the inputs from related suppliers, as recorded in the company’s own accounting system. If the basis differs by input, please check all that apply and explain further in the narrative box.

Purchase cost valuation method	Check all that apply
Related supplier’s cost	<input type="checkbox"/>
Cost plus	<input type="checkbox"/>
Negotiated transfer price to approximate fair market value	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>
If the methods used differ by input, please describe:	

- III-7b. **Inputs from related suppliers valuation method.**—Please confirm that the inputs purchased from related suppliers, as identified in III-6, were reported in III-9a (financial results on ESBR) in a manner consistent with the firm’s accounting books and records.

Yes	No	If no—Provide an explanation and the valuation basis used for these inputs in question III-9a.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-8. **Allocation basis.**—Briefly describe the allocation bases used by your firm to assign the costs and expenses listed below to ESBR in the normal course of business and in the financial results reported in question III-9a.

<b>Cost/expense</b>	<b>Allocation bases used for ESBR—</b>	
	<b>In the normal course of business</b>	<b>In the financial results at III-9a</b>
Raw materials		
Direct labor		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		

- III-9a. **Operations on ESBR.**—Report the revenue and related cost information requested below on the ESBR operations of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing operations.

**Net sales**—Report all commercial sales, internal consumption, and transfers to related firms, whether these are domestic sales or exports. Report net sales values less discounts, returns, allowances, and prepaid freight, in U.S. dollars, f.o.b. your point of shipment. The freight costs associated with delivering the product to your customer should not be included.

Note: The total net sales quantities and values should match the total shipment quantities and values reported in Part II of this questionnaire; i.e., both sections are to be reported on a calendar-year basis.

**Internal consumption**—Product consumed internally by your firm. Report internal consumption at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

**Transfers to related firms**—Sales made to related firms. Report transfers to related firms at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

**Costs and expenses**—Include costs and expenses associated with all reported net sales (i.e., for both domestic and export commercial sales, internal consumption, and transfers to related firms). If any freight costs were removed from net sales values, ensure the associated costs are removed from the applicable cost/expense line.

**Inputs from related suppliers**—Any inputs purchased from related suppliers should be reported in a manner consistent with your firm's accounting books and records.

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes ESBR, as well as specific statements and worksheets) used to compile these data.*

III-9a. **Operations on ESBR.**—*Continued*

Quantity (in 1,000 pounds) and value (in \$1,000)						
Item	Calendar year					
	2017	2018	2019	2020	2021	2022
<b>Net sales quantities:</b>						
Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales quantities	0	0	0	0	0	0
<b>Net sales values:</b>						
Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales values	0	0	0	0	0	0
<b>Cost of goods sold (COGS):</b>						
Butadiene						
Styrene						
Other raw materials						
Total raw material costs	0	0	0	0	0	0
Direct labor						
Other factory costs						
Total COGS	0	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0	0
<b>SG&amp;A expenses</b>						
<b>Operating income (loss)</b>	0	0	0	0	0	0
<b>Other expenses and income:</b>						
Interest expense						
All other expense items						
All other income items						
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0	0

- III-9b. **Financial data reconciliation.**—Certain line items from question III-9a, including total net sales quantities and values, total COGS, gross profit (or loss), operating profit (or loss), and net income (or loss), have been calculated based on the data submitted for other line items. Are the data in these calculated line items correct according to your firm's financial records ignoring non-material differences that may arise due to rounding?

		<p><b>If no--</b>If the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise.</p> <p>Also, check signs accorded to the post operating income line items. The two expense line items should report positive numbers (i.e., expenses are positive, and incomes or reversals are negative in these lines – instances of the latter should be rare in these lines). The income line item should also, in most instances, be a positive number (i.e., income is positive, and expenses or reversals are negative in this line).</p> <p>If, after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated line items persist, please identify and discuss the differences in the space below.</p>
<b>Yes</b>	<b>No</b>	
<input type="checkbox"/>	<input type="checkbox"/>	

- III-9c. **Other raw materials.**--To the extent that costs associated with "Other raw materials" were reported in III-9a, please identify the relevant raw materials. Among the raw materials identified, if a particular input predominates in terms of its share of total "other raw materials," please also specify that input.

--

- III-9d. **Inventory revaluation.**--Please describe how butadiene, styrene, and finished goods are routinely valued for inventory purposes. Please indicate whether butadiene, styrene, and finished goods inventories were revalued during the period examined and, if so, when revaluation occurred, the circumstances of revaluation, and impact on relevant ESBR costs reported in table III-9a financial results.

i) Butadiene; styrene

--

ii) Finished goods

--

- III-9e. **Depreciation expense.**—Please report the amount of total depreciation expense that is included within the reported financial results at question III-9a.

Item	Calendar years					
	2017	2018	2019	2020	2021	2022
Depreciation expense (in \$1,000)						

- III-9f. **Depreciation expense classification.**—Please indicate the line item(s) within question III-9a (e.g., other factory costs, SG&A expenses, etc.) that include the total depreciation expense reported above.

--



III-10a. **Nonrecurring items (charges and gains) included in the ESBR financial results.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question III-9a. If a nonrecurring item that is not product-specific was allocated to the results at question III-9a, please report the allocated value, below, rather than the aggregate amount.

Note: The Commission's objective here is to gather information on material (significant) nonrecurring items which impacted the reported financial results for ESBR in question III-9a.

Item	Calendar year					
	2017	2018	2019	2020	2021	2022
	Value (\$1,000)					
Nonrecurring item 1						
Nonrecurring item 2						
Nonrecurring item 3						
Nonrecurring item 4						
Nonrecurring item 5						
Nonrecurring item 6						
Nonrecurring item 7						

III-10b. **Nonrecurring items (charges and gains) included in the ESBR financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

Item	Description of the nonrecurring item	Location (i.e., line item) within question III-9a
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**—If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business, just as responses to question III-10 identify the specific line items in question III-9a where these items are reported.

--

III-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of ESBR. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for ESBR in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations used in question III-9a.

**Note:** Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to ESBR if these assets are also related to other products.

Value (in \$1,000)						
Item	Calendar year ended					
	2017	2018	2019	2020	2021	2022
Total assets (net)						

III-12b. **Description of asset values.**—Please provide explanations for any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) included in the above response.

III-13a. **Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and research and development expenses for ESBR.

Value (in \$1,000)						
Item	Calendar year					
	2017	2018	2019	2020	2021	2022
Capital expenditures						
R&D expenses						

III-13b. **Description of reported capital expenditures.**—Please describe the nature, focus, and significance of your firm’s reported capital expenditures. If no capital expenditure data were reported, please explain the reason.

III-13c. **Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm’s reported R&D expenses.

III-14a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question III-9a should reconcile with the total shipments reported in question II-6 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis.

If the calculated fields below return values other than zero (i.e., "0") this indicates the total net sales quantities and values do not match the total shipments quantities and values.

Reconciliation	Full year data					
	2017	2018	2019	2020	2021	2022
<b>Quantity:</b> Trade data from question II-6 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0	0
<b>Value:</b> Trade data from question II-6 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0	0

III-14b. **Data consistency and reconciliation (calendar-year based financial data).**—Do the data in question III-9a reconcile with the data in question II-6 (i.e., the calculated fields are returning zeros in the table above) for all periods?

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

- III-15. **Effects on financial performance of COVID-19.**—Has the COVID-19 pandemic, or any government actions taken to contain the spread of the COVID-19 virus, affected the financial performance of your firm's operations on ESBR as reported in question III-9a? In your response, please include the duration and timing of any impacts as they relate to your firm's financial performance.

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

- III-16. **Other explanations.**—If your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--

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

Further information on this part of the questionnaire can be obtained from Natalia King (202-205-2049, [Natalia.King@usitc.gov](mailto:Natalia.King@usitc.gov)).

- IV-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 IV.

Name	
Title	
Email	
Telephone	

**PRICE DATA**

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

**Product 1.**— IISRP 1502 grade of ESBR in all forms; sales made under a contract agreement

**Product 2.**— IISRP 1783 grade of ESBR in all forms; sales made under a contract agreement

**Product 3.**— IISRP 1502 grade of ESBR in all forms; spot sales

**Product 4.**— IISRP 1783 grade of ESBR in all forms; spot sales

**Please note that values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts or rebates).**

- (a) During January 2017 -December 2022, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

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

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

<b>(Quantity in pounds, value in dollars)</b>								
<b>Period of shipment</b>	<b>Product 1</b>		<b>Product 2</b>		<b>Product 3</b>		<b>Product 4</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<b>2017:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2018:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2019:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2020:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:

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

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000s)?	<input type="checkbox"/>
In actual pounds ( <b>not</b> 1,000 pounds)?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. inland 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:	

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

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

--

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

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

- IV-4. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-5. **Pricing terms.**--On what basis are your firm's prices of domestic ESBR usually quoted (*check one*)?

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

IV-6. **Contract versus spot.**-- Approximately what shares of your firm's sales of its U.S.-produced ESBR in 2022 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)	
<b>Share of 2022 sales</b>	%	%	%	%	0.0 %

IV-7. **Contract provisions.**— Please fill out the table regarding your firm's typical sales contracts for U.S.-produced ESBR (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 <sup>1</sup>	<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"/>
<sup>1</sup> Please identify the indexes used:				



IV-8. **Conversion prices.**—

- a) Do you have contracts that are indexed to the price of butadiene and styrene with a conversion price that is fixed at the time of the contract is agreed to?

No (if no skip to question IV-9)	Yes (if yes respond to parts b and c)
<input type="checkbox"/>	<input type="checkbox"/>

- b) Provided the weighted average conversion prices for your firm's contract sales of ESBR by product type (as set at the time of the contract) for all in-scope ESBR products, by year and ESBR series.

Year contract was agreed to	Conversion price (dollars per pound) 1500 series ESBR	Conversion price (dollars per pound) 1700 series ESBR
2017		
2018		
2019		
2020		
2021		
2022		

- c) Please explain any trends in the conversion prices you reported in part b.

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- IV-9. **Lead times.**-- What is your firm's share of sales (including both contact and spot sales) of its U.S.-produced ESBR from inventory and produced to order, and the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced ESBR?

Source	Share of 2022 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

IV-10. **Shipping information.**--

- (a) Who generally arranges the transportation to your firm's customers' locations?  
☐ Your firm    ☐ Purchaser (*check one*)
- (b) Indicate the approximate percentage of your firm's sales of ESBR that are delivered the following distances from your firm's production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total</b> (should sum to 100.0%)	0.0 %

- IV-11. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced ESBR since January 1, 2017 (check all that apply)?

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

- IV-12. **Inland transportation costs.**--What is the approximate percentage of the cost of U.S.-produced ESBR that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent

- IV-13. **End uses.**--Have there been any changes in the end uses of ESBR since January 1, 2017 or do you anticipate any future changes?

No	Yes	If yes, explain the changes, noting when these changes occurred or are expected to occur. List any new applications for ESBR.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-14. **Substitutes.**--Have there been any changes in the number or types of products that can be substituted for ESBR since January 1, 2017 or do you anticipate any future changes?

No	Yes	If yes, explain the changes, noting when these changes occurred or are expected to occur.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-15. **Availability of supply.**--Has the availability of ESBR in the U.S. market changed since January 1, 2017? Do you anticipate any future changes?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
<b>Changes since January 1, 2017:</b>			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Brazil, Mexico, Poland, and South Korea	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Anticipated changes:</b>			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Brazil, Mexico, Poland, and South Korea	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-16. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for ESBR has changed since January 1, 2017, and how you anticipate demand will change in the future. Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
<b>Demand since January 1, 2017</b>					
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Anticipated future demand</b>					
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-17. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of ESBR since January 1, 2017 or do you anticipate any future changes?

No	Yes	If yes, please describe, noting when these changes occurred or are expected to occur.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Business cycles.**--Is the ESBR market subject to business cycles, either during the year or across years?

No	Yes	If yes, including any changes since January 1, 2017.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-19. **Conditions of competition.**--Is the ESBR market subject to conditions of competition distinctive to ESBR (other than the business cycles described in the previous question)?

No	Yes	Please describe, including any changes since January 1, 2017.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-20. **Supply constraints.**--Has your firm refused, declined, or been unable to supply ESBR since January 1, 2017 (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.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-21. **Raw materials.**-- Indicate how ESBR raw material prices have changed since January 1, 2017, and how you expect they will change in the future.

Raw materials prices	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for ESBR.
Changes since January 1, 2017	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-22. **Price comparisons.**-- Are you aware of prices of ESBR in non-U.S. markets? If yes, please compare market prices of ESBR in U.S. and non-U.S. markets. Provide information as to time periods and regions for any price comparisons and note the sources for your market knowledge.

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

- IV 23. **Shelf life.**—Does your firm have a policy which it imposes a shelf-life on its ESBR, after which it is considered to be off-specification? If yes, please report how long you hold the ESBR before is beyond its shelf-life and how does your firm sell any ESBR that is beyond its shelf-life.

No	Yes	If yes, what is the maximum firm-imposed shelf-life (days)	In 2022, how much of your firm's sales of ESBR exceeded this storage threshold in (1,000 pounds)	Explain how your firm sells any ESBR that is beyond its shelf-life.
<input type="checkbox"/>	<input type="checkbox"/>			

- IV-24. **Export constraints.**--Describe how easily your firm can shift its sales of ESBR between the U.S. market and alternative export markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting ESBR between the U.S. and alternative export markets within a 12-month period.

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- IV-25. **Barriers to trade.**--Are your firm's exports of ESBR subject to any tariff or non-tariff barriers to trade in other countries?

No	Yes	If yes, please list the countries and describe any such barriers and any significant changes in such barriers that have occurred since January 1, 2017, or that are expected to occur in the future.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-26. **Interchangeability.**--Is ESBR 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	Brazil	Mexico	Poland	South Korea	Other countries
United States					
Brazil	X				
Mexico	X	X			
Poland	X	X	X		
South Korea	X	X	X	X	
For any country-pair producing ESBR 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 ESBR produced in the countries:					

- IV-27. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between ESBR 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	Brazil	Mexico	Poland	South Korea	Other countries
United States					
Brazil					
Mexico					
Poland					
South Korea					

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

- IV-28. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, 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.

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## 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://ids.usitc.gov/case/4440/investigation/8258>.

***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:** XXXX

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

**If your firm does not produce this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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