

## U.S. PRODUCERS' QUESTIONNAIRE

### CERTAIN FREIGHT RAIL COUPLERS AND PARTS THEREOF FROM CHINA AND MEXICO

This questionnaire must be received by the Commission by **April 3, 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 antidumping and countervailing duty investigations concerning freight rail couplers from China and Mexico (Inv. Nos. 701-TA-682 and 731-TA-1592-1593 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Website \_\_\_\_\_

Has your firm produced freight rail couplers (as defined on next page) or out-of-scope freight rail coupler system components (as defined on page 3) in the United States at any time since January 1, 2020?

- ☐ **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 petitions 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://ids.usitc.gov/case/8085/investigation/8331>.

**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 these investigations 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 these investigations 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 these investigations 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 subheading 9803.00.5000 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.

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

**Reporting of information.**--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

**Confidentiality.**--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

**Verification.**--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

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

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

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

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

- I-1b. **TAA information release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, contact person's title, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

☐ Yes      ☐ No

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

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

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

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

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

Law firm:	
Lead attorney(s):	

- I-3. **Petitioner status.**--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

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

- I-4. **Petition support.**--Does your firm support or oppose the petitions?

Country	Investigation type	Support	Oppose	Take no position
China	Antidumping duty (AD)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Countervailing duty (CVD)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mexico	Antidumping duty (AD)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

Firm name	Country	Extent of ownership (percent)

[illegible]

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

Further information on this part of the questionnaire can be obtained from Ahdia Bavari ([ahdia.bavari@usitc.gov](mailto: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 production of freight rail couplers since January 1, 2020.

(Check as many as appropriate)		(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)
<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"/>	Weather-related or force majeure events	
<input type="checkbox"/>	Other (e.g., revised labor agreements, technology)	

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

- II-2c. **AD/CVD investigations 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 the 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 operations (e.g., supply chain arrangements, U.S. production, employment, shipments, etc.) 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 impacted your firm's reported data in Part II of this questionnaire.

No	Yes	If yes, please describe.
<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 freight rail couplers, and the combined production capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

**"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.

**"Installed overall 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 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 freight rail coupler capacity"** – The level of production of freight rail couplers 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 freight rail couplers based on the actual product mix experienced over the period.

<b>Takes into account</b>	<b>Installed overall capacity</b>	<b>Practical overall capacity</b>	<b>Practical freight rail coupler capacity</b>
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 freight rail couplers	No	No	Yes

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

Quantity (in 1,000 pounds)			
Item	Calendar year		
	2020	2021	2022
<b>Capacity measures:</b>			
Installed overall capacity <sup>1</sup>			
Practical overall capacity <sup>1 2</sup>			
Practical freight rail coupler capacity <sup>3 4</sup>	0	0	0
<b>Production of:</b>			
Freight rail couplers <sup>4</sup>	0	0	0
Other products <sup>5</sup>			
Subtotal, all out-of-scope products	0	0	0
Total production using same machinery or workers	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" and "practical" overall production capacities.

<sup>3</sup> Data entered in question II-8 for this indicator will populate here.

<sup>4</sup> Data reported for practical freight rail coupler capacity should be **greater** than the data reported for production of freight rail couplers 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 freight rail couplers then "practical overall" and "practical freight rail couplers" 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.

--

- 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"/>	Regulatory constraints (e.g., environmental regulations, permitting restrictions)	
<input type="checkbox"/>	Other constraints (e.g., community relations, public perception, or other specified concerns)	

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

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- II-4. **Product shifting (other products).**—

- (a) Is your firm able to switch production (capacity) between freight rail couplers 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.

--

- 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 freight rail coupler 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 freight rail coupler production capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall production capacity and practical freight rail coupler 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 freight rail coupler 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. **Tolling.**--Since January 1, 2020, has your firm been involved in a toll agreement regarding the production of freight rail couplers?

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

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

**II-7. Foreign trade zones.--**

- (a) **Firm's FTZ operations.**--Does your firm produce freight rail couplers in and/or admit freight rail couplers 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.

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

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

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

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

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

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

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

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

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

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

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

II-8. Production, shipment, and inventory data.--Continued

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Calendar year		
	2020	2021	2022
<b>Practical freight rail coupler capacity<sup>1</sup></b> (quantity) (A)			
<b>Beginning-of-period inventories</b> (quantity) (B)			
<b>Production</b> (quantity) (C)			
<b>U.S. shipments:</b>			
<b>Commercial shipments:</b>			
Quantity (D)			
Value (E)			
<b>Internal consumption:<sup>2</sup></b>			
Quantity (F)			
Value <sup>2</sup> (G)			
<b>Transfers to related firms:<sup>2</sup></b>			
Quantity (H)			
Value <sup>2</sup> (I)			
<b>Export shipments:<sup>3</sup></b>			
Quantity (J)			
Value (K)			
<b>End-of-period inventories</b> (quantity) (L)			

<sup>1</sup> Report practical freight rail coupler capacity consistent with the definitions and instructions provided in question II-3a.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>3</sup> Identify your firm's principal export markets: \_\_\_\_\_.

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

Reconciliation	Calendar year		
	2020	2021	2022
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	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-9. **U.S. shipments by channel of distribution and 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 channel of distribution and product type during the specified periods.

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Calendar year		
	2020	2021	2022
<b>U.S. shipments to OEMs:</b>			
<b><u>Freight rail coupler fit/assembly:</u></b>			
Quantity (M)			
Value (N)			
<b><u>Freight rail coupler components:</u></b>			
<b>Knuckles:</b>			
Quantity (O)			
Value (P)			
<b>Coupler bodies:</b>			
Quantity (Q)			
Value (R)			
<b>U.S. shipments to the replacement market:</b>			
<b><u>Freight rail coupler fit/assembly:</u></b>			
Quantity (S)			
Value (T)			
<b><u>Freight rail coupler components:</u></b>			
<b>Knuckles:</b>			
Quantity (U)			
Value (V)			
<b>Coupler bodies</b>			
Quantity (W)			
Value (X)			

**RECONCILIATION OF US SHIPMENTS.**—Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines O through T) equal the quantity and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year		
	2020	2021	2022
<b>Quantity:</b> $M + O + Q + S + U + W - D - F - H =$ zero ("0"), if not revise	0	0	0
<b>Value:</b> $N + P + R + T + V + X - E - G - I =$ zero, ("0"), if not revise.	0	0	0

- II-10. **U.S. shipments containing Bedloe technology.**--Report your firm's U.S. shipments of freight rail couplers produced using the production process patented by Bedloe Industries LLC (for example, StratoMax products with Bedloe technology).

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Calendar year		
	2020	2021	2022
<b>U.S. shipments containing Bedloe technology:</b>			
Quantity (AA)			
Value (AB)			

- II-11. **Production capability and actual production of freight rail couplers using Bedloe technology.**—  
Indicate whether your firm has and/or is able to produce freight rail couplers using Bedloe technology.

Item	(Check one)	Explanation
Able to produce and actually produced	<input type="checkbox"/>	Indicate the quantity produced (1,000 pounds) in 2022: _____.
Able to produce, but did not actually produce	<input type="checkbox"/>	Indicate the reasons your firm did not produce freight rail couplers using Bedloe technology despite having the technical capabilities to do so: _____.
Not able to produce	<input type="checkbox"/>	Indicate the technical reasons your firm is unable to produce freight rail couplers using Bedloe technology with your existing capital investments: _____.  Specify how much new investment it would take for your firm to be able to produce freight rail couplers using Bedloe technology: _____.

- II-12. **Employment data.**--Report your firm's employment-related data related to the production of freight rail couplers 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		
	2020	2021	2022
Average number of PRWs ( <i>number</i> )			
Hours worked by PRWs ( <i>1,000 hours</i> )			
Wages paid to PRWs ( <i>\$1,000</i> )			

Explanation of trends:

--

- II-13. **Related firms.**--If your firm reported transfers to related firms in question II-8, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

--

- II-14. **Purchases.**--Has your firm purchased freight rail couplers produced in the United States or in other countries since January 1, 2020? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

**"Purchase"** – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

**"Import"** – A transaction to buy from a foreign supplier where your firm is the importer of record.

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

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

(Quantity in 1,000 pounds)			
Item	Calendar year		
	2020	2021	2022
Purchases from U.S. importers of freight rail couplers from—			
China			
Mexico			
Total purchases, subject sources	0	0	0
All other sources			
Purchases from domestic producers <sup>1</sup>			
Purchases from other sources <sup>2</sup>			
Total purchases, all sources	0	0	0
<sup>1</sup> Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. <sup>2</sup> Please list the name of the firm(s) from which your firm purchased this product: _____.			

II-15. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of freight rail couplers from China and Mexico at any time since January 1, 2020, report those purchases by the individual importer of record and subject source.

## Purchases of subject imports

<b>Quantity (<i>in 1,000 pounds</i>)</b>				
<b>Importer of record</b>	<b>Subject source</b>	<b>Calendar year</b>		
		<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Grand total:</b>		<b>0</b>	<b>0</b>	<b>0</b>

**II-14. 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		
	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

**II-16. Imports.**--Since January 1, 2020, has your firm imported freight rail couplers?

<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-17. **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 fit/assembly.

- (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-18. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--



**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Zahra Bekkal (202-205-2684, [zahra.bekkal@usitc.gov](mailto:zahra.bekkal@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

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

- A1. When does your firm's fiscal year end (month and day)? \_\_\_\_\_  
If your firm's fiscal year changed since January 1, 2020, explain below:

\_\_\_\_\_

- A.2. Note: Calendar-year data are required for the annual-year financial data in this section (i.e., in questions III-9a, III-9d, III-12a, and III-13a). Please indicate whether the results in this section are provided on a calendar-year basis (including firms with a calendar-year based fiscal year) or on a fiscal-year basis that does not align with the calendar year.

☐ Calendar-year basis      ☐ Fiscal-year basis (does not align with the calendar year)

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

\_\_\_\_\_

- B.2. Does your firm prepare profit/loss statements for freight rail couplers:  
☐ 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 freight rail couplers, and provide the share of net sales accounted for by these products in 2022.

Products	Share of sales in 2022
Freight rail couplers	%
	%
	%
	%
	%

- III-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of freight rail couplers 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-6. ☐ No--Continue to question III-8a.

- III-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of freight rail couplers 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 freight rail couplers) 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 freight rail couplers 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 freight rail couplers—</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 freight rail couplers.**—Report the revenue and related cost information requested below on the freight rail couplers 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: If the financial data are reported on a calendar-year basis, the total net sales quantities and values should match the total shipment quantities and values reported in Part II of this questionnaire (see question III-14 for a reconciliation grid).

**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 freight rail couplers, as well as specific statements and worksheets) used to compile these data.*

III-9a. Operations on freight rail couplers.—Continued

<i>Quantity (in 1,000 pounds) and value (in \$1,000)</i>			
Item	Years		
	2020	2021	2022
<b>Net sales quantities:</b>			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales quantities	0	0	0
<b>Net sales values:</b>			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
<b>Cost of goods sold (COGS):</b>			
Raw materials			
Direct labor			
Other factory costs			
Total COGS	0	0	0
<b>Gross profit or (loss)</b>	0	0	0
<b>SG&amp;A expenses</b>			
<b>Operating income (loss)</b>	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

- 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?

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

- III-9c. **Raw materials.**—Please report the share of total raw material costs in 2022 (reported in III-9a) for the following raw material inputs:

Input	Share of total raw material costs (percent)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Scrap steel		<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs <sup>1</sup>		<input type="checkbox"/>	<input type="checkbox"/>
Total (should sum to 100 percent)	0.0		
<sup>1</sup> If there are notable or significant raw material inputs included within the “other material inputs” category, please list those here and provide the share of the total raw material costs for which they account:			

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

Item	Years		
	2020	2021	2022
Depreciation expense (in \$1,000)			

- III-9e. **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 depreciation expense reported above.

--



III-10a. **Nonrecurring items (charges and gains) included in the freight rail couplers 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 freight rail couplers in question III-9a.

Item	Years		
	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 freight rail couplers 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.

	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 freight rail couplers. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for freight rail couplers 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 freight rail couplers if these assets are also related to other products.

Value (in \$1,000)			
Item	Years		
	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 freight rail couplers.

Value (in \$1,000)			
Item	Years		
	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-8 (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	Years		
	2020	2021	2022
<b>Quantity:</b> Trade data from question II-8 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
<b>Value:</b> Trade data from question II-8 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

Is the financial data in question III-9a reported on a calendar-year basis?

☐ Yes— Complete question III-14b.

☐ No— Continue to question III-15.

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-8 (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"/>	

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

- III-15. **Effects of imports on investment.**—Since January 1, 2020, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of freight rail couplers from China and/or Mexico?

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

	<i>(check as many as appropriate)</i>	<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

- III-16. **Effects of imports on growth and development.**—Since January 1, 2020, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of freight rail couplers from China and/or Mexico?

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

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

- III-17. **Anticipated effects of imports.**—Does your firm anticipate any negative effects due to imports of freight rail couplers from China and/or Mexico?

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

- III-18. **Effects on financial performance of COVID-19.**—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 freight rail couplers 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-19. **Other explanations.**—If your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--

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

Further information on this part of the questionnaire can be obtained from John Benedetto (202-205-3270, john.benedetto@usitc.gov).

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

Name	
Title	
Email	
Telephone	

**PRICE DATA**

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2020 of the following products produced by your firm.

**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.<sup>1</sup>

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

**Product 4.**--SBE60, Grade E steel coupler (also known as an "assembly" or a "fit"), bottom shelf, 21.5" shank length, produced to AAR M-211 and/or AAR M-215 specifications.

**Product 5.**--SE60 coupler body, grade E steel, double shelves, produced to AAR M-211 and/or AAR M-215 specifications.<sup>3</sup>

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

- IV-2a. During January 2020-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 tables as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question IV-3.

<sup>1</sup> 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".

<sup>2</sup> 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".

<sup>3</sup> Pricing product 5 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".

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

<b>(Quantity in 1,000 pounds, value in dollars)</b>						
<b>Period of shipment</b>	<b>Product 1</b>		<b>Product 2</b>		<b>Product 3</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<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 your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 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 **1,000 pounds** and **actual dollars** (not 1,000s).

<b>(Quantity in 1,000 pounds, value in dollars)</b>				
<b>Period of shipment</b>	<b>Product 4</b>		<b>Product 5</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<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 your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 4:

Product 5:

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

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000s)?	<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 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"/>	

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 freight rail couplers usually quoted (*check one*)?

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

IV-6. **Contract versus spot.**--Approximately what shares of your firm's sales of its U.S.-produced freight rail couplers 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)	
Share of 2022 sales	%	%	%	%	0.0 %

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced freight rail couplers (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation (during contract period)	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	Quantity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs <sup>1</sup>	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<sup>1</sup> Please identify the indexes used: _____.				

IV-8. **Lead times.**--What is your firm's share of sales of its U.S.-produced freight rail couplers 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 freight rail couplers?

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-9. Shipping information.--**

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

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

- IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced freight rail couplers since January 1, 2020 (check all that apply)?

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

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

IV-12. **End uses.**--List the end uses of the freight rail couplers that your firm manufactures. 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	
OEM railcar	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-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"/>	

IV-14. **Demand trends.**--Has the demand for freight rail couplers steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2020, both inside and outside the United States (if known)? Explain any trends and describe the principal factors that have affected these changes in demand. How is it anticipated to change?

Market	Steadily increased	Fluctuated up	No change	Fluctuated down	Steadily decreased	Explanation and factors
<b>Demand since January 1, 2020</b>						
Within the United States	<input type="checkbox"/>	<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"/>	<input type="checkbox"/>	
<b>Anticipated future demand</b>						
Within the United States	<input type="checkbox"/>	<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"/>	<input type="checkbox"/>	

- IV-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of freight rail couplers since January 1, 2020?

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

- IV-16. **Business cycles.**--Is the market for freight rail couplers subject to business cycles, either during the year or across years? If yes, describe.

No	Yes	If yes, including any changes since January 1, 2020.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-17. **Conditions of competition.**--Is the market for freight rail couplers subject to conditions of competition distinctive to freight rail couplers other than the business cycles described in the previous question? If yes, describe.

No	Yes	If yes, including any changes since January 1, 2020.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Supply constraints.**--Has your firm refused, declined, or been unable to supply freight rail couplers at any time between January 1, 2020 and September 28, 2022 (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"/>	

- (b) Has your firm experienced any supply constraints since the petition was filed on September 28, 2022?

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

IV-19. **Raw materials.**--Have freight rail couplers raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2020?

Steadily increased	Fluctuated up	No change	Fluctuated down	Steadily decreased	Explain, noting how raw material price changes have affected your firm's selling prices for freight rail couplers.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-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			
<p>For any country-pair producing freight rail couplers which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude the interchangeable use of freight rail couplers produced in the countries:</p>			



- IV-21. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, bundling, *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			
<p>For any country-pair for which factors other than price are <i>always</i> or <i>frequently</i> a significant factor in your firm's sales of freight rail couplers, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:</p>			

- IV-22. **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, 2020?

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

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

- IV-23. **Role of section 232 measures.**—Did the measures (e.g. tariffs, quotas, etc.) on imported steel/aluminum products under section 232, or changes in the measures (such as the level, coverage, or nature of the measures), have an impact on the freight rail couplers market in the United States, including any effects on freight rail couplers cost, price, supply, and/or demand, since January 1, 2020?

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

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

--

- IV-24. **Bedloe technology (i.e., StratoMax products with Bedloe technology).**—

(a) Does your firm produce products that customers view as equivalent to Bedloe technology?

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

(b) Do freight rail couplers with Bedloe technology have different end uses than freight rail couplers without Bedloe technology?

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

(c) Are freight rail couplers with/without Bedloe technology supplied to the U.S. market through different (i.e., distinct, non-overlapping) channels of distribution?

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

(d) Are there meaningful differences between the Association of American Railroads (AAR) certification/classification of freight rail couplers on the basis of Bedloe technology?

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

IV-25. **Bundling.**-- Does your firm bundle sales of freight rail couplers with complete undercarriages or other products?

<b>No</b>	<b>Yes</b>	<b>If yes, what percentage of your firm's sales of freight rail couplers are made pursuant to a bundling package?</b>	<b>If yes, please describe other products that your firm typically sells in bundles with freight rail couplers.</b>
<input type="checkbox"/>	<input type="checkbox"/>		

IV-26. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for freight rail couplers since January 1, 2020. 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 2022.

	Customer's name	City	State	Share of 2022 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				



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

- V-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”*** – 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”*** – 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>physical characteristics and uses</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>interchangeability</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.).

<b>Product-pair</b>	<b>Comparison</b>	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.

<b>Product-pair</b>	<b>Comparison</b>	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).

<b>Product-pair</b>	<b>Comparison</b>	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.

<b>Product-pair</b>	<b>Comparison</b>	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		

- V-2. **Production, shipment, and inventory data.**--Report your firm's production capacity, production, shipments, and inventories related to the production of out-of-scope freight rail coupler system components in its U.S. establishment(s) during the specified periods.

## OUT-OF-SCOPE FREIGHT RAIL COUPLER SYSTEM COMPONENTS

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Calendar year		
	2020	2021	2022
<b>Average production capacity<sup>1</sup></b> (quantity) (A)			
<b>Beginning-of-period inventories</b> (quantity) (B)			
<b>Production</b> (quantity) (C)			
<b>U.S. shipments:</b>			
<b>Commercial shipments:</b>			
quantity (D)			
value (E)			
<b>Internal consumption:<sup>2</sup></b>			
quantity (F)			
value (G)			
<b>Transfers to related firms:<sup>2</sup></b>			
quantity (H)			
value (I)			
<b>Export shipments:<sup>3</sup></b>			
quantity (J)			
value (K)			
<b>End-of-period inventories</b> (quantity) (L)			

<sup>1</sup> The production capacity reported is based on operating \_\_\_\_\_ hours per week, \_\_\_\_\_ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity (use additional pages as necessary). \_\_\_\_\_.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>3</sup> Identify your firm's principal export markets: \_\_\_\_\_.

V-2. **Production, shipment, and inventory data.**--Continued

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

Reconciliation item	Calendar year		
	2020	2021	2022
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	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: _____.			



- V-3. **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 during the specified periods.

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Calendar year		
	2020	2021	2022
<b>U.S. shipments to OEMs:</b> <u>Yokes or follower blocks that were sold as part of a full freight rail coupler system:</u> Quantity (M)			
Value (N)			
<u>Freight rail coupler system components that were sold separately (i.e., not as part of a full FRC system):</u> Yokes: Quantity (O)			
Value (P)			
<b>Follower block:</b> Quantity (Q)			
Value (R)			
<b>U.S. shipments to replacement market:</b> <u>Yokes or follower blocks that were sold as part of a full freight rail coupler system:</u> Quantity (S)			
Value (T)			
<u>Freight rail coupler system components that were sold separately (i.e., not as part of a full FRC system):</u> Yokes: Quantity (U)			
Value (V)			
<b>Follower block:</b> Quantity (W)			
Value (X)			

***RECONCILIATION OF US SHIPMENTS.**—Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines O through T) equal the quantity and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., “0”), the data reported must be revised prior to submission to the Commission.*

Reconciliation	Calendar year		
	2020	2021	2022
<b>Quantity:</b> $M + O + Q + S + U + W - D - F - H = \text{zero ("0")}$ , if not revise	0	0	0
<b>Value:</b> $N + P + R + T + V + X - E - G - I = \text{zero, ("0")}$ , if not revise.	0	0	0

- V-4. **Employment data.**--Report your firm's employment-related data related to the domestic (U.S.) production of out-of-scope freight rail coupler system components and provide an explanation for any trends in these data.

**"Production 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 domestic (U.S.) production operations. Do not report employment data for production occurring outside of the United States or employment data for U.S. sales of products manufactured outside the United States.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to March periods, calculate similarly and divide by 3.

If your firm had the same number of PRWs in all calendar years and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3)."

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

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

## OUT-OF-SCOPE FREIGHT RAIL COUPLER SYSTEM COMPONENTS

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

Explanation of trends:

--

- V-5. **Operations on in-scope alternative product.**-- Report the revenue and related cost information requested below on out-of-scope freight rail coupler system components operations of your firm's U.S. establishment(s).<sup>1</sup> Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed years. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Zahra Bekkal (202-205-2684, [Zahra.Bekkal@usitc.gov](mailto:Zahra.Bekkal@usitc.gov)) before completing this section of the questionnaire.

## OUT-OF-SCOPE FREIGHT RAIL COUPLER SYSTEM COMPONENTS

Quantity (in 1,000 pounds) and value (in \$1,000)			
Item	Years		
	2020	2021	2022
<b>Net sales quantities:</b> <sup>2</sup>			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
<b>Net sales values:</b> <sup>2</sup>			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
<b>Cost of goods sold (COGS):</b> <sup>3</sup>			
Raw materials			
Direct labor			
Other factory costs			
Total COGS	0	0	0
<b>Gross profit or (loss)</b>	0	0	0
<b>Selling, general, and administrative (SG&amp;A) expenses:</b>			
<b>Operating income (loss)</b>	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
<b>Depreciation/amortization included above</b>			

<sup>1</sup> Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

<sup>2</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.

<sup>3</sup> COGS (whether for domestic or export sales) should include costs associated with CS, IC, and Transfers.

*RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure that the quantities and values reported for total shipments in V-3 the quantities and values reported total net sales in V-6 in each time period unless the financial data from part V-6 are reported on a fiscal year basis.*

Reconciliation	Years		
	2020	2021	2022
<b>Quantity:</b> Trade data from question V-2 (lines D, F, H, and J) less financial total net sales quantity data from question V-6, = zero ("0").	0	0	0
<b>Value:</b> Trade data from question V-2 (lines E, G, I, and K) less financial total net sales value data from question V-6, = zero ("0").	0	0	0

V-6a. **Asset values.**--As applicable, report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of out-of-scope freight rail coupler system components. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets related to operations on in-scope alternative product in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in table V-3d. Provide data as of the end of your firm's three most recently completed years. (Note: Total assets should reflect net assets after any accumulated depreciation and allowances deducted. As reported in this table, total assets should be allocated if they are also related to the operations of other products.) In the note to table V-3e, please provide a brief explanation if there were any substantial changes in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

## OUT-OF-SCOPE FREIGHT RAIL COUPLER SYSTEM COMPONENTS

Value (in \$1,000)			
	Years		
	2020	2021	2022
Total assets (net) <sup>1</sup>			

V-6b. **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.

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- V-7a. **Capital expenditures and R&D expenses.**--Report your firm's capital expenditures and R&D expenses for out-of-scope freight rail coupler system components. Provide data for your firm's three most recently completed years. The manner in which capital expenditures and R&D expenses are assigned to operations on out-of-scope freight rail coupler system components should be consistent with the manner in which capital expenditures and R&D expenses were assigned to operations on freight rail couplers (III-13).

## OUT-OF-SCOPE FREIGHT RAIL COUPLER SYSTEM COMPONENTS

Value (in \$1,000)			
Item	Years		
	2020	2021	2022
Capital expenditures <sup>1</sup>			
R&D expenses <sup>2</sup>			

- V-7b. **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.

- V-7c. **Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm's reported R&D expenses.

## 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/8085/investigation/8331>.

***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](mailto: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 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).