

## U.S. PRODUCERS' QUESTIONNAIRE

### COLD-DRAWN MECHANICAL TUBING FROM CHINA, GERMANY, INDIA, ITALY, SOUTH KOREA, AND SWITZERLAND

This questionnaire must be received by the Commission by **September 29, 2023**  
See last page for instructions regarding how to file this questionnaire.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its reviews of the countervailing duty orders on certain cold-drawn mechanical tubing of carbon and alloy steel ("cold-drawn mechanical tubing") from China and India and the antidumping duty orders on cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and Switzerland (Inv. Nos. 701-TA-576-577 and 731-TA-1362-1367 (Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Website \_\_\_\_\_

Has your firm produced cold-drawn mechanical tubing (as defined on the next page) at any time since January 1, 2017?

☐ **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 Commission **Drop Box** by clicking on the following link:

<https://dropbox.usitc.gov/oinv/> (PIN: **CDMT**). See last page for detailed instructions.

#### CERTIFICATION

*I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings or reviews conducted by the Commission on the same or similar merchandise.*

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

\_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Title of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

\_\_\_\_\_  
Email address

**PART I.—GENERAL INFORMATION**

**Background.**--On February 1, 2018, the Department of Commerce ("Commerce") issued countervailing duty orders on imports of cold-drawn mechanical tubing from China and India. On June 11, 2018, Commerce issued antidumping duty orders on imports of cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and Switzerland. On January 3, 2023, the Commission instituted reviews pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make affirmative determinations, the orders will remain in place. If either the Commission or Commerce makes negative determinations, Commerce will revoke the orders. Questionnaires and other information pertinent to this proceeding are available at [https://usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://usitc.gov/reports/active_import_injury_questionnaires) and <https://ids.usitc.gov/case/4541/investigation/8334>.

**Cold-drawn mechanical tubing** covered by this proceeding is cold-drawn mechanical tubing of carbon and alloy steel of circular cross-section, 304.8 mm or more in length, in actual outside diameters less than 331mm, and regardless of wall thickness, surface finish, end finish or industry specification. The subject cold-drawn mechanical tubing is a tubular product with a circular cross-sectional shape that has been cold-drawn or otherwise cold-finished after the initial tube formation in a manner that involves a change in the diameter or wall thickness of the tubing, or both. The subject cold-drawn mechanical tubing may be produced from either welded (e.g., electric resistance welded, continuous welded, etc.) or seamless (e.g., pierced, pilgered or extruded, etc.) carbon or alloy steel tubular products. It may also be heat treated after cold working. Such heat treatments may include, but are not limited to, annealing, normalizing, quenching and tempering, stress relieving or finish annealing. Typical cold-drawing methods for subject merchandise include, but are not limited to, drawing over mandrel, rod drawing, plug drawing, sink drawing and similar processes that involve reducing the outside diameter of the tubing with a die or similar device, whether or not controlling the inside diameter of the tubing with an internal support device such as a mandrel, rod, plug or similar device. Other cold-finishing operations that may be used to produce subject merchandise include cold-rolling and cold-sizing the tubing.

Subject cold-drawn mechanical tubing is typically certified to meet industry specifications for cold-drawn tubing including but not limited to:

(1) American Society for Testing and Materials (ASTM) or American Society of Mechanical Engineers (ASME) specifications ASTM A-512, ASTM A-513 Type 3 (ASME SA513 Type 3), ASTM A-513 Type 4 (ASME SA513 Type 4), ASTM A-513 Type 5 (ASME SA513 Type 5), ASTM A-513 Type 6 (ASME SA513 Type 6), ASTM A-519 (cold-finished);

(2) SAE International (Society of Automotive Engineers) specifications SAE J524, SAE J525, SAE J2833, SAE J2614, SAE J2467, SAE J2435, SAE J2613;

(3) Aerospace Material Specification (AMS) AMS T-6736 (AMS 6736), AMS 6371, AMS 5050, AMS 5075, AMS 5062, AMS 6360, AMS 6361, AMS 6362, AMS 6371, AMS 6372, AMS 6374, AMS 6381, AMS 6415;

(4) United States Military Standards (MIL) MIL-T-5066 and MIL-T-6736;

(5) foreign standards equivalent to one of the previously listed ASTM, ASME, SAE, AMS or MIL specifications including but not limited to:

(a) German Institute for Standardization (DIN) specifications DIN 2391–2, DIN 2393–2, DIN 2394–2;

(b) European Standards (EN) EN 10305–1, EN 10305–2, EN 10305–4, EN 10305–6 and European national variations on those standards (e.g., British Standard (BS EN), Irish Standard (IS EN) and German Standard (DIN EN) variations, etc.);

(c) Japanese Industrial Standard (JIS) JIS G 3441 and JIS G 3445; and

(6) proprietary standards that are based on one of the above-listed standards.

The subject cold-drawn mechanical tubing may also be dual or multiple certified to more than one standard. Pipe that is multiple certified as cold-drawn mechanical tubing and to other specifications not covered by this scope, is also covered by the scope of these orders when it meets the physical description set forth above.

Steel products included in the scope of these orders are products in which: (1) Iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight.

For purposes of this scope, the place of cold-drawing determines the country of origin of the subject merchandise. Subject merchandise that is subject to minor working in a third country that occurs after drawing in one of the subject countries including, but not limited to, heat treatment, cutting to length, straightening, non-destruction testing, deburring or chamfering, remains within the scope of these orders.

All products that meet the written physical description are within the scope of these orders unless specifically excluded or covered by the scope of an existing order. Merchandise that meets the physical description of cold-drawn mechanical tubing above is within the scope of these orders even if it is also dual or multiple certified to an otherwise excluded specification listed below. The following products are outside of, and/or specifically excluded from, the scope of these orders:

(1) Cold-drawn stainless steel tubing, containing 10.5 percent or more of chromium by weight and not more than 1.2 percent of carbon by weight;

(2) products certified to one or more of the ASTM, ASME or American Petroleum Institute (API) specifications listed as follows: ASTM A–53; ASTM A–106; ASTM A–179 (ASME SA 179); ASTM A–192 (ASME SA 192); ASTM A–209 (ASME SA 209); ASTM A–210 (ASME SA 210); ASTM A–213 (ASME SA 213); ASTM A–334 (ASME SA 334); ASTM A–423 (ASME SA 423); ASTM A–498; ASTM A–496 (ASME SA 496); ASTM A–199; ASTM A–500; ASTM A–556; ASTM A–565; API 5L; and API 5CT except that any cold-drawn tubing product certified to one of the above excluded specifications will not be excluded from the scope if it is also dual- or multiple-certified to any other specification that otherwise would fall within the scope of these orders.

Cold-drawn mechanical tubing is currently imported under statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030 of the Harmonized Tariff Schedule of the United States (HTSUS). It may also be imported under HTSUS statistical reporting numbers 7306.30.1000 and 7306.50.1000. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

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

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

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

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

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

- I-1. **Reporting requirements.**--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire for use by the Office of Management and Budget.

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 provide such comments to the Office of Investigations, [import\\_injury@usitc.gov](mailto:import_injury@usitc.gov).

- 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 cold-drawn mechanical tubing, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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

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

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

Law firm:	
Lead attorney(s):	

- I-3. **Position regarding continuation of orders.**--Does your firm support or oppose continuation of the following antidumping and countervailing duty orders currently in place for cold-drawn mechanical tubing?

Country	Order type	Support	Oppose	Take no position
China	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Germany	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Italy	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Switzerland	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

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

Firm name	Country	Extent of ownership (percent)

[illegible]

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

Further information on this part of the questionnaire can be obtained from Mary Messer (202-205-3193, [mary.messer@usitc.gov](mailto:mary.messer@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 cold-drawn mechanical tubing since January 1, 2017.

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



- II-2b. **COVID-19 pandemic.**—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 cold-drawn mechanical tubing? 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 the impact over time on the (a) supply chain, (b) production and shipments, and (c) employment with respect to cold-drawn mechanical tubing.
<input type="checkbox"/>	<input type="checkbox"/>	

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

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and discuss the underlying assumptions and business reasons for them.
<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 cold-drawn mechanical tubing, and the combined capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

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

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

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

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

Quantity (in short tons)								
Item	Calendar year						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
<b>Capacity measures:</b>								
<b>Installed overall</b> capacity <sup>1</sup>								
<b>Practical overall</b> capacity <sup>1 2</sup>								
<b>Practical cold-drawn mechanical tubing</b> capacity <sup>3 4</sup>	0	0	0	0	0	0	0	0
<b>Production of:</b>								
Cold-drawn mechanical tubing <sup>4</sup>	0	0	0	0	0	0	0	0
Other out-of-scope products <sup>5</sup>								
Total production using same machinery or workers	0	0	0	0	0	0	0	0

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

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

<sup>3</sup> Data for this indicator will populate here once reported below in question II-6.

<sup>4</sup> Data reported for practical cold-drawn mechanical tubing capacity should be greater than the data reported for production of cold-drawn mechanical tubing 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 cold-drawn mechanical tubing then "practical overall" and "practical cold-drawn mechanical tubing" capacity measures should be equal to each other.

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

- II-3b. **Operating parameters.**--The *practical* overall 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 capacities reported in II-3a, and explain any changes in reported capacities.

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

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

- II-3e. **Reaching installed overall 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 capacity reported in II-3a.

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

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- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between cold-drawn mechanical tubing 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 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 capacity and practical cold-drawn mechanical tubing 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 capacity and practical cold-drawn mechanical tubing capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical cold-drawn mechanical tubing capacity measures account for <u>normal downtime, maintenance, repair and clean-up</u> activities?	<input type="checkbox"/>
Does the difference between practical overall capacity and practical cold-drawn mechanical tubing capacity equal the portion of practical overall 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. **Shipments and inventory data.**--Report you firm's uses (shipment or storage) of domestically produced cold-drawn mechanical tubing during the specified periods.

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

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

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

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

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

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

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

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

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

Quantity ( <i>in short tons</i> ) and value ( <i>in \$1,000</i> )								
Item	Calendar year						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
<b>Practical cold-drawn mechanical tubing capacity<sup>1</sup></b> ( <i>quantity</i> ) (A)								
<b>Beginning-of-period inventories</b> ( <i>quantity</i> ) (B)								
<b>Production</b> ( <i>quantity</i> ) (C)								
<b>U.S. shipments:</b>								
<b>Commercial shipments:</b>								
<i>quantity</i> (D)								
<i>value</i> (E)								
<b>Internal consumption:<sup>2</sup></b>								
<i>quantity</i> (F)								
<i>value</i> (G)								
<b>Transfers to related firms:<sup>2</sup></b>								
<i>quantity</i> (H)								
<i>value</i> (I)								
<b>Export shipments:<sup>3</sup></b>								
<i>quantity</i> (J)								
<i>value</i> (K)								
<b>End-of-period inventories:</b>								
<i>quantity</i> (L)								

<sup>1</sup> Report your firm's practical cold-drawn mechanical tubing 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: \_\_\_\_\_.



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

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

Item	Calendar year						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.								

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

Quantity (in short tons)								
Item	Calendar year						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
<b>Channels of distribution:</b>								
U.S. shipments— to distributors (M)								
to end users (N)								

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

Reconciliation item	Calendar year						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
M + N – D – F – H = zero ("0"), if not revise.	0	0	0	0	0	0	0	0

- II-8. **U.S. shipments by end use.**—Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by intended end use during the specified period. *For any of your firm's U.S. shipments made to distributors, please attempt to report those volumes in the most appropriate ultimate end use line, and do not simply group all of those shipments in the "Other" category.*

Quantity (in short tons)	
Item	Calendar year 2022
<b>U.S. shipments:</b>	
Agricultural (O)	
Automotive (P)	
Heavy machinery/industrial (Q)	
Oil and gas (R)	
Other <sup>1</sup> (S)	
<sup>1</sup> Identify other end uses: _____.	

**RECONCILIATION OF U.S. SHIPMENTS BY END USE.**—Please ensure that the quantities in short tons reported in this question (i.e. lines O through S) equal the quantities in short tons reported for U.S. shipments (i.e. lines D, F, and H) in question II-6 for 2022. If calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Quantity (in short tons)	
Reconciliation	Calendar year 2022
$O + P + Q + R + S - D - F - H = \text{zero ("0")}$ , if not revise.	0

- II-9. **U.S. shipments by type.**—Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by type during 2022.

Quantity (in short tons)	
Item	Calendar year 2022
<b>U.S. shipments of cold-drawn mechanical tubing made from:</b>	
Carbon steel welded pipe (T)	
Carbon steel seamless pipe (U)	
Alloy steel welded pipe (V)	
Alloy steel seamless pipe (W)	

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.**—Please ensure that the quantities in short tons reported in this question (i.e. lines T through W) equal the quantities in short tons reported for U.S. shipments (i.e. lines D, F, and H) in question II-6 for 2022. If calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Quantity (in short tons)	
Reconciliation	Calendar year 2022
$T + U + V + W - D - F - H = \text{zero ("0")}$ , if not revise.	0

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

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

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

For the January to June periods, calculate similarly and divide by 6. If your firm had the same number of PRWs in all calendar year and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3)."

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

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

Item	Calendar year						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
<b>Employment data:</b>								
Average number of PRWs ( <i>number</i> ) (X)								
Hours worked by PRWs ( <i>1,000 hours</i> ) (Y)								
Wages paid to PRWs ( <i>\$1,000</i> ) (Z)								

Explanation of trends:

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

--



II-13. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and/or Switzerland at any time since January 1, 2017, report those purchases by the individual importer of record and subject source.

## Purchases of subject imports

[illegible]

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

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

Reconciliation	Calendar year						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0	0	0	0	0	0

II-14. **Imports.**--Since January 1, 2017, has your firm imported cold-drawn mechanical tubing?

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

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

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

<b>No</b>	<b>Yes</b>	
<input type="checkbox"/>	<input type="checkbox"/>	If yes—Please complete the table below

<b>Does your firm act as the toller or tollee in this arrangement?</b>	<b>Toller:</b> <input type="checkbox"/>	<b>Tollee:</b> <input type="checkbox"/>
Report the share of your firm's production of cold-drawn mechanical tubing that was included in this toll arrangement in 2022.		%
Please describe the activities performed in this tolling arrangement:		
Please indicate the name(s) of the firm(s) involved:		

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

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

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

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

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

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



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

- II-17. **Effect of order(s).**--Describe the significance of the existing antidumping and countervailing duty orders covering imports of cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and/or Switzerland in terms of its effect on your firm's capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the order(s).

--

- II-18. **Likely impact of revocation.**--Would your firm anticipate any changes in the character of its operations or organization, including its capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of cold-drawn mechanical tubing in the future if the antidumping and countervailing duty orders on cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and/or Switzerland were to be revoked?

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

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

--

**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Jennifer Brinckhaus (202-205-3188, [jennifer.brinckhaus@usitc.gov](mailto:jennifer.brinckhaus@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

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

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

\_\_\_\_\_

- A.2. Note: Calendar-year data are preferred for the annual-year financial data in this section (i.e., in questions III-9a, III-9d, III-12a, and III-13a). However, if providing this data on a calendar-year basis is unduly burdensome or provides results that are not reliable, fiscal-year based data are acceptable. Please indicate whether the results in part III of the questionnaire are provided on a calendar-year basis (including firms with calendar-year based fiscal years) 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 cold-drawn mechanical tubing:

\_\_\_\_\_

- B.2. Does your firm prepare profit/loss statements for cold-drawn mechanical tubing:

☐ 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 cold-drawn mechanical tubing and provide the share of net sales accounted for by these products in 2022.

Products	Share of sales in 2022
Cold-drawn mechanical tubing	%
	%
	%
	%
	%

- III-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of cold-drawn mechanical tubing 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-8.

- III-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of cold-drawn mechanical tubing 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 cold-drawn mechanical tubing) 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 cold-drawn mechanical tubing 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 cold-drawn mechanical tubing—</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 cold-drawn mechanical tubing.**—Report the revenue and related cost information requested below on the cold-drawn mechanical tubing 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.

**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 cold-drawn mechanical tubing, as well as specific statements and worksheets) used to compile these data.*

III-9a. **Operations on cold-drawn mechanical tubing.**—*Continued*

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

III-9a. **Operations on cold-drawn mechanical tubing.—Continued**

Quantity (in short tons) and value (in \$1,000)		
Item	January-June 2022	January-June 2023
<b>Net sales quantities:</b>		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales quantities	0	0
<b>Net sales values:</b>		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales values	0	0
<b>Cost of goods sold (COGS):</b>		
Raw materials		
Direct labor		
Other factory costs		
Total COGS	0	0
<b>Gross profit or (loss)</b>	0	0
<b>SG&amp;A expenses</b>		
<b>Operating income (loss)</b>	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



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

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

III-9c. **Raw materials.**—Please report the share of total raw material costs in 2022 (as 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
Tubing hollows		<input type="checkbox"/>	<input type="checkbox"/>
Hot-rolled steel sheet		<input type="checkbox"/>	<input type="checkbox"/>
Billets		<input type="checkbox"/>	<input type="checkbox"/>
Steel bar		<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						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
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 cold-drawn mechanical tubing 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 cold-drawn mechanical tubing in question III-9a.

Item	Years						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
	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 cold-drawn mechanical tubing financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

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

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

--

III-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of cold-drawn mechanical tubing. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for cold-drawn mechanical tubing 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 are deducted).

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

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

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

Value (in \$1,000)								
Item	Years						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
Capital expenditures								
R&D expenses								

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

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

III-14a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question III-9a should reconcile with the total shipments reported in question II-6 (including export shipments) for the annual-year periods if they are reported on the same calendar-year basis. The interim-period data should reconcile whether the financial data are on a calendar- or fiscal-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						January-June	
	2017	2018	2019	2020	2021	2022	2022	2023
<b>Quantity:</b> Trade data from question II-6 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0	0	0	0
<b>Value:</b> Trade data from question II-6 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0	0	0	0

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

☐ Yes— Complete question III-14b.      ☐ No— Complete question III-14c

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

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

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

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

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

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

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

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

Further information on this part of the questionnaire can be obtained from Tana von Kessler ((202) 205-2389, [tana.vonkessler@usitc.gov](mailto:tana.vonkessler@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

**PRICE DATA**

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

**Product 1.**--ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 5.000 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

**Product 2.**--ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 4.500 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

**Product 3.**--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 2.500 inches, wall thickness 0.240 - 0.260 inch, length 17 - 24 feet, not honed, deburred ends.

**Product 4.**--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 3.000 inches, wall thickness 0.178 - 0.198 inch, length 17 - 24 feet, not honed, deburred ends.

**Product 5.**--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 3.750 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

**Product 6.**--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 4.000 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

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 2017-June 2023, 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.



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

<b>(Quantity in short tons, 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>2017:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2018:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2019:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2020:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2021:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2022:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2023:</b>						
January-March						
April-June						

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

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

**Note.**--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of the 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 **short tons** and **actual dollars** (not 1,000s).

<b>(Quantity in short tons, value in dollars)</b>						
<b>Period of shipment</b>	<b>Product 4</b>		<b>Product 5</b>		<b>Product 6</b>	
	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>	<b>Quantity</b>	<b>Value</b>
<b>2017:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2018:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2019:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2020:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2021:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2022:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2023:</b>						
January-March						
April-June						

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

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

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

Product 4:

Product 5:

Product 6:

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

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000) and actual short tons?	<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"/>
Exclude export shipments?	<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 cold-drawn mechanical tubing (*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 cold-drawn mechanical tubing 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 cold-drawn mechanical tubing 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 cold-drawn mechanical tubing (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 cold-drawn mechanical tubing 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 cold-drawn mechanical tubing?

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 cold-drawn mechanical tubing that are delivered the following distances from your firm's production facility.

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

- IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced cold-drawn mechanical tubing since January 1, 2017 (check all that apply)?

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

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

IV-12. **End uses.**--Have there been any changes in the end uses of cold-drawn mechanical tubing since January 1, 2017 or do you anticipate any future changes?

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

IV-13. **Substitutes.**--Have there been any changes in the number or types of products that can be substituted for cold-drawn mechanical tubing since January 1, 2017 or do you anticipate any future changes?

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

IV-14. **Availability of supply.**--Has the availability of cold-drawn mechanical tubing in the U.S. market changed since January 1, 2017? Do you anticipate any future changes?

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

- IV-15. **Demand trends.**-- Has demand within the United States and outside of the United States (if known) for cold-drawn mechanical tubing steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2017, and how do you anticipate demand will change in the future? Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Select one box per row. If you are unfamiliar with a sector, please leave that row blank.

Market	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explanation and factors
<b>Demand since January 1, 2017</b>						
Within the United States: Overall demand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Agricultural sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Automotive sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Heavy machinery/industrial sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Oil and gas sector	<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: Overall demand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Agricultural sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Automotive sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Heavy machinery/industrial sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Oil and gas sector	<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-16. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of cold-drawn mechanical tubing since January 1, 2017 or do you anticipate any future changes?

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

- IV-17. **Business cycles.**--Is the cold-drawn mechanical tubing market subject to business cycles, either during the year or across years? If yes, describe.

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

- IV-18. **Conditions of competition.**--Is the cold-drawn mechanical tubing market subject to conditions of competition distinctive to cold-drawn mechanical tubing other than the business cycles described in the previous question? If yes, describe.

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

- IV-19. **Supply constraints.**--Has your firm refused, declined, or been unable to supply cold-drawn mechanical tubing since January 1, 2017 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

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

- IV-20. **Raw materials.**-- Have cold-drawn mechanical tubing raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2017, and how do you expect they will change in the future?

Select one box per row.

Raw materials prices	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how raw material price changes have affected your firm's selling prices for cold-drawn mechanical tubing.
Changes since January 1, 2017	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



- IV-21. **Price comparisons.**-- Are you aware of prices of cold-drawn mechanical tubing in non-U.S. markets? If yes, please compare market prices of cold-drawn mechanical tubing in U.S. and non-U.S. markets. Provide information as to time periods and regions for any price comparisons and note the sources for your market knowledge.

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

- IV-22. **Export constraints.**--Describe how easily your firm can shift its sales of cold-drawn mechanical tubing between the U.S. market and alternative export markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting cold-drawn mechanical tubing between the U.S. and alternative export markets within a 12-month period.

--

- IV-23. **Barriers to trade.**--Are your firm's exports of cold-drawn mechanical tubing subject to any tariff or non-tariff barriers to trade in other countries?

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

IV-24. **Interchangeability.**—How often is cold-drawn mechanical tubing 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	Germany	India	Italy	South Korea	Switzerland	Other countries
United States							
China							
Germany							
India							
Italy							
South Korea							
Switzerland							

For any country-pair producing cold-drawn mechanical tubing which is *sometimes* or *never* interchangeable, please identify the country-pair and explain the factors that limit or preclude the interchangeable use of cold-drawn mechanical tubing produced in the countries:

IV-25. **Factors other than price.**—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between cold-drawn mechanical tubing 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

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

Country-pair	China	Germany	India	Italy	South Korea	Switzerland	Other countries
United States							
China							
Germany							
India							
Italy							
South Korea							
Switzerland							

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

IV-26. **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 cold-drawn mechanical tubing market in the United States, including any effects on cold-drawn mechanical tubing cost, price, supply, and/or demand, since January 1, 2017?

<b>Yes—</b> Please indicate the impact in the table below.	<b>No—</b> Skip to next question.	<b>Don't know—</b> Skip to next question.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Select one box per row.

<b>Factor</b>	<b>Steadily increase</b>	<b>Fluctuate up</b>	<b>No change</b>	<b>Fluctuate down</b>	<b>Steadily decrease</b>	<b>Explain, noting how the imposition of tariffs under section 301 affected each factor of the cold-drawn mechanical tubing market in the United States.</b>
Supply of U.S.-produced cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of cold-drawn mechanical tubing imported from China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of cold-drawn mechanical tubing imported from other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall U.S. demand for cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-27. **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 cold-drawn mechanical tubing market in the United States, including any effects on cold-drawn mechanical tubing cost, price, supply, and/or demand, since January 1, 2017?

<b>Yes—</b> Please indicate the impact in the table below.	<b>No—</b> Skip to next question.	<b>Don't know—</b> Skip to next question.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Select one box per row.

<b>Factor</b>	<b>Steadily increase</b>	<b>Fluctuate up</b>	<b>No change</b>	<b>Fluctuate down</b>	<b>Steadily decrease</b>	<b>Explain, noting how the imposition of measures under section 232 affected each factor of the cold-drawn mechanical tubing market in the United States.</b>
Supply of U.S.-produced cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of imported cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall U.S. demand for cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for cold-drawn mechanical tubing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-28. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

## 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://usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://usitc.gov/reports/active_import_injury_questionnaires) and  
<https://ids.usitc.gov/case/4541/investigation/8334>.

***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:** **CDMT**

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

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

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