U.S. PURCHASERS' QUESTIONNAIRE

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

This questionnaire must be received by the Commission by <u>September 29, 2023</u>

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 review of the countervailing duty/antidumping duty orders concerning certain cold-drawn mechanical tubing of carbon and alloy steel ("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 possession (19 U.S.C. § 1333(a)). Further information on this questionnaire can be obtained from Tana von Kessler ((202) 205-2389, tana.vonkessler@usitc.gov).

City	State	Zip Code
Website		
•	n purchased cold-drawn mechanical tubing (as c t any time since January 1, 2017?	lefined on the next page) <u>from any source</u> (domestic
☐ 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 retu	rn the entire questionnaire to the Commission)
	stionnaire via the Commission <i>Drop Box</i> by pbox.usitc.gov/oinv/. (PIN: CDMT). See last	•
	CERTIFICATI	ON
formation provided inducted by the Comm the undersigned, acluded	in this questionnaire and throughout this pronission on the same or similar merchandise. knowledge that information submitted in response to and used: (i) because the content of the con	on, and its employees and contract personnel, to use the ceeding in any other import-injury proceedings or review to this request for information and throughout thing the Commission, its employees and Offices, and contract related proceeding, or (b) in internal investigations, audits
iews, and evaluation pendix 3; or (ii) by U	ons relating to the programs, personnel, an	d operations of the Commission including under 5 U.S.C nnel, solely for cybersecurity purposes. I understand that a
me of Authorized Of	ficial Title of Authorized Official	Date
gnature	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 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.

<u>Purchaser</u>.--Any firm engaged, either directly or through a parent company or subsidiary, in purchasing cold-drawn mechanical tubing from another firm that produces, imports, or otherwise distributes cold-drawn mechanical tubing.

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 in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

<u>Confidentiality</u>.--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.

<u>Verification</u>.--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.

I-1. <u>Reporting requirements</u>.--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.

	<u></u>						
I-2a.	<u>Establishments covered.</u> Provide the name and address of establishment(s) covered by this questionnaire, if different from that listed on the cover page. Firms operating more than one establishment should combine the data for all establishments into a single response.						
	"Establishment" Each facility of a firm involved in the <u>purchase</u> of cold-drawn mechanical tubing, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.						
I-2b.	Stock symbol information If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol:						
I-2c.	<u>External counsel.</u> If your firm or parent firm is represented by external counsel in relation to this proceeding, having filed an entry of appearance, please specify the name of the law firm and the lead attorney(s).						
	Law firm:						
	Lead attorney(s):						

U.S. Purchasers' Questionnaire - Cold-Drawn Mechanical Tubing (Review) I-3. Ownership.--Is your firm owned, in whole or in part, by any other firm? No Yes--List the following information, relating to the ultimate parent/owner. **Extent of ownership** (percent) Firm name Country I-4. Related producers/importers/exporters.--Does your firm have any related firms, either domestic or foreign, that produce cold-drawn mechanical tubing, import cold-drawn mechanical tubing into the United States, or export cold-drawn mechanical tubing to the United States? "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. No Yes--List the following information. Type (i.e., producer, Firm name exporter, importer) Country **Affiliation**

PART II.--PURCHASES

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

Name	
Title	
Email	
Telephone	

II-1. Purchases.—

(a) Please estimate your firm's total U.S. purchases of cold-drawn mechanical tubing in 2022. (Do not include imports for which your firm was the importer of record; such imports should be reported in your U.S. importer's questionnaire.)

Quantity (short tons)	
Quantity (0.1010 to 1.0)	

(b) Report (or estimate) the share of the quantity of your firm's purchases of cold-drawn mechanical tubing in 2022 that were produced in each of the specified countries.

Cold-drawn mechanical tubing produced in:	Share of quantity of 2022 purchases
United States	%
China	%
Germany	%
India	%
Italy	%
South Korea	%
Switzerland	%
All other countries:1	%
Sources unknown	%
Total (should sum to 100.0%)	0.0 %
¹ Please identify these countries:	

0.5. 1 4161	lasers Questi	omiane – cola	-Diawii Wieciia	ilicai Tubilig (Nevie	rage
II-2. <u>P</u>	urchases befo	re and after o	der		
(a	-	ir firm purchas (orea, and/or S	om China, Germany, India, Italy		
	☐ No-	-skip to (c)	Yes		
(t				•	anical tubing from China, changed since 2017?
		Check only	one per source	e (row)	
	No, our pattern of purchasing essentially unchanged from this	is purchase from this	s purchase from this source	Yes, we changes the pattern of purchases fro this source, b	of m ut
Source	source.	the orders			•
China					
Germany					
India					
Italy					
South Korea					
Switzerland					
(c	sources		s other than Ch		tubing from nonsubject foreign a, Italy, South Korea, and/or
	We did not purchase from nonsubject foreign sources before or	No, our pattern of purchasing is	Yes, we increased purchases from nonsubject foreign sources	Yes, but we changed our pattern of purchases from nonsubject foreign sources	
	after the orders	essentially unchanged.	because of the orders.	for reasons other than the orders.	Please explain the reasons other than the orders.

II-3. Changes in purchasing patterns.-- Please indicate whether the shares of your firm's purchases of cold-drawn mechanical tubing steadily increased, fluctuated but ended higher, were constant, fluctuated but ended lower, or steadily decreased since January 1, 2017 from the listed sources.

Sel	lect	one	hox	ner	row.
ンヒ	CCL	OHIC	DDA	ושט	1000.

Source of purchases	Did not purchase	Steadily increased	Fluctuated up	No change	Fluctuated down	Steadily decreased	Explanation for trend
United States							
China							
Germany							
India							
Italy							
South Korea							
Switzerland							
All other countries							
Sources unknown							

II-4. <u>Country knowledge.--</u> Please indicate whether your firm has experience or is otherwise familiar with cold-drawn mechanical tubing produced in the following countries.

United States	China	Germany	India	Italy	South Korea	Switzerland	Other countries	Other countries (specify)

II-5. **Supplier identification.**--Please list your firm's **FIVE** largest suppliers for cold-drawn mechanical tubing since January 1, 2017, by quantity. Also, provide the share of the quantity of your firm's total purchases of cold-drawn mechanical tubing that each of these suppliers accounted for in 2022.

No.	Supplier's name	City and state	Share of quantity of 2022 purchases
1			%
2			%
3			%
4			%
5			%

PART III.--MARKET CHARACTERISTICS AND PURCHASING PRACTICES

III-1.	Firm typeWhich of the following best describes your firm as a purchaser of cold-drawn
	mechanical tubing (check all that apply)?

					End user (Heavy				
		End	user	End user	machinery/	End user	End user		
Distr	ibutor	(Agriculture)		(Automotive)	industrial)	(oil and gas)	(other¹)		
[
¹ Please	e describe	"other":							
If your	firm is a d	listributo	or of cold	-drawn mechanic	al tubing, please o	answer questions I	II-2 and III-3.		
III-2.	III-2. <u>Competition for sales.</u> Do you compete for sales to your customers with the manufacturers or importers from which you purchase cold-drawn mechanical tubing?								
	No	Yes	If yes, p	lease describe.					
III-3.	Types of mechanic			t are the major ty	oes of customers t	o which you sell c	old-drawn		

Ιf	vour	firm	is an	end	user o	f cold-	drawn	mech	anical	ltuhina	nlease	answer	auestions	III_ 4	and I	III-5
"	vour	1111111	is un	ıenu	usei u	ı colu-	uruwn	mecn	urncui	Lubina.	Dieuse	unswer	uuestions	111-4	unu i	111-5.

No	Yes		explain the c	hanges, noting wh	en these chang	es occurred or are
<u>Demano</u>	d for end-u	se produ	<u>ıcts</u>			
	tubing stea	adily deci ner, or st	reased, fluctu	final products inco lated but ended lo sed since January 1	wer, were const	lrawn mechanical ant, fluctuated but
	Steadily				Fluctuated	
	increase	d Flu	ctuated up	Constant	down	Steadily decrease
		d Flu	ctuated up	Constant	down	Steadily decrease
(b)				Constant irm's demand for o		
(b)				irm's demand for o		
(b)	Has this ha	ad any ef		irm's demand for o	cold-drawn mecl	
<u>Substitu</u> substitu	Has this ha	Yes	fect on your f	irm's demand for o	cold-drawn mecl Explain r or types of pro	hanical tubing?
<u>Substitu</u> substitu	Has this ha	Yes re there to d-drawn	fect on your f	irm's demand for o	Explain r or types of proy 1, 2017 or do y	hanical tubing?

III-7. <u>Demand trends.</u>-- 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
	De	emand since	January	1, 2017		
Within the United States: Overall demand						
Agricultural sector						
Automotive sector						
Heavy machinery/industrial sector						
Oil and gas sector						
Outside the United States						
	-	Anticipated	future de	mand		
Within the United States: Overall demand						
Agricultural sector						
Automotive sector						
Heavy machinery/industrial sector						
Oil and gas sector						
Outside the United States						

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	tubing pro supply?	duced in a	a specific	country	or countries over other possible cour	ntry sources of						
			No	Yes	If yes, identify the countries and expreferences.	xplain any						
	Your firm											
	Your cust	omers										
I-9.	share of y	Importance of purchasing domestic productPlease fill out the table below, estimating the share of your firm's total 2022 purchases of cold-drawn mechanical tubing that required cold-drawn mechanical tubing produced in the United States.										
						Estimated share of you firm's total 2022 purchases of cold-draw mechanical tubing						
	Purchases	that did	not requir	e dome	stic product	%						
	Purchases product (6		%									
	Purchases required b		%									
	Purchases (explain:	that wer	domestic product for other reasons	%								
	Total	should s	um to 100	0.0%)		0.0 %						
I-10.	<u>Business cycles.</u> 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, pl	ease de	scribe, including any changes since Ja	anuary 1, 2017.						
I-11.	of compet	ition disti	nctive to o	cold-dra	ld-drawn mechanical tubing market s wn mechanical tubing other than the fyes, describe.	-						
		V	If was rai	ooso do	coribe including any changes since I	1 2017						
	No	Yes	it yes, pi	ease de	scribe, including any changes since Ja	anuary 1, 2017.						
	No	Yes	ir yes, pi	ease ue	scribe, including any changes since is	anuary 1, 2017.						

III-12. <u>Decisions based on producer and country-of-origin.</u>— How often does your firm, and if known, do your customers, make purchasing decisions involving cold-drawn mechanical tubing based on its producer or country of origin?

	Always	Usually	Sometimes	Never	If at least sometimes, explain.
		D	ecision based o	on produc	cer
Your firm					
Your customers					
		Decis	ion based on c	ountry of	origin
Your firm					
Your customers					

III-13. **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.
Changes since January 1, 2	2017:		
U.Sproduced product			
Imports from China, Germany, India, Italy, South Korea, and/or Switzerland			
Imports from all other countries			
Anticipated changes:			
U.Sproduced product			
Imports from China, Germany, India, Italy, South Korea, and/or Switzerland			
Imports from all other countries			

U.S. Pu	ırchasers'	Questic	nnair	e – C	old-Drawn N	∕lechanical T	ubing (Revie	ew)	Page 15
III-14.		-		-		-Are certain g stry sources?		/sizes of	cold-drawn mechanical
	No	Yes		•	lease identi m those cou	-	ies and the	grades/ty	pes/sizes available
III-15.	cold-dra allocatio	wn med on or "co ers, deliv	hanic ontroll vering	al tuk led or	oing since Jai rder entry," (nuary 1, 2017 declining to a	7 (examples in accept new c	include p ustomers	apply your firm with lacing customers on s or renew existing leet timely shipment
	No	Ye							
III-16.	-16. Purchasing frequencyHow frequently do you make purchases of cold-drawn mechanical tubing (check one)?								
		Daily	Wee	kly	Monthly	Quarterly	Annually	Other	If other, specify
III- 1 7.	Raw ma	terial pı	rices	_					
		Is your f drawn n				rices for raw	materials us	ed in the	production of cold-
		N	0	١	/es – please	answer (b)			
]			
						Il prices affec al tubing sinc			iations or contracts to
		No	Yes	Ехр	lain				
III-18.						many supplichase? Betwe			chanical tubing do you firms.

U.S. Pu	rchasers	' Questio	nnaire -	- Cold-Drawn Mechanical Tubing (Review)	Page 16
III-19.				Do your firm's purchases of cold-drawn mechanical tubing usual ween your firm and suppliers of cold-drawn mechanical tubing?	
	No	Yes		explain the factors you generally negotiate and note whether uotes prices from competing suppliers during negotiations.	your
III-20.	Change	in suppl	iersHa	as your firm changed suppliers since January 1, 2017?	
	No	Yes		please list the supplier(s), whether the firm was added or drop ne reasons for the change.	ped,
III-21.	New su	ppliers	-		
	(a)	•		of any new suppliers, either foreign or domestic, that have enter nuary 1, 2017?	ed the
		No	Yes	If yes, please identify the firms.	
	(b)	Do you e	expect n	ew cold-drawn mechanical tubing suppliers to enter the U.S. ma	arket?
		No	Yes	If yes, please explain.	
III-22.				Do you require your suppliers to be or to become certified or quical tubing to your firm?	alified to
	If yes, p	The num A genera descript	nber of o al descri ion of th	ving information. days required to qualify a new supplier. ption of the certification or qualification process. Also, a brief ne factors that you consider when qualifying a new supplier (e.g. bility of supplier, etc.).	, quality

ty

No	Number of days	Certification/qualification process and factors considered

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III-23.	Failure to certifySince January 1, 2017, have any domestic or foreign producers failed in their
	attempts to certify or qualify their cold-drawn mechanical tubing with your firm or have any
	producers lost their approved status?

No	If yes, please identify these producers, the countries where they are located, and the reasons why they failed or lost the certification/qualification.

III-24.	Major purchasing factorsPlease list, in order of their importance, the three major factors your
	firm considers in deciding from whom to purchase cold-drawn mechanical tubing (examples
	include availability, extension of credit, contracts, price, quality, range of supplier's product line,
	traditional supplier, etc.).

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

III-25. <u>Purchasing factors.</u>--Please rate the importance of the following factors in your firm's purchasing decisions for cold-drawn mechanical tubing.

Factor	Very important	Somewhat important	Not important
Availability			
Delivery terms			
Delivery time			
Discounts offered			
Minimum quantity requirements			
Packaging			
Payment terms			
Price			
Product consistency			
Product range			
Quality meets industry standards			
Quality exceeds industry standards			
Reliability of supply			
Technical support/service			
U.S. transportation costs			

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III-26.	Quality charact quality of cold-o			tics does your	firm consider v	vhen evaluati	ng the
III-27.	Minimum quali meet minimum				_		g countries
	Sour	ce	Always	Usually	Sometimes	Rarely or never	Don't know
	United States						
	China						
	Germany						
	India						
	Italy						
	South Korea						
	Switzerland						
	Other:						
III-28.	Frequency of de				s your firm pur	chase the colo	d-drawn
	Always		Usually	So	ometimes	Ne	ever
III-29.	Price leaders either upward of significant impa	r downwai	d, that is follow	ed by other fi	rms, or (2) one	or more firms	s that have a
	Please list the n		•	•	orice leaders in	the cold-draw	vn
	Firm(s) Describe how the firm(s) exhibited price leadership						

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

For questions III-30 and III-31, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

III-30.	Effect of order(s) Describe the effect on your firm and the U.S. market of the existing countervailing and antidumping duty orders covering imports of cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and/or Switzerland on your firm and the U.S. market.
III-31.	<u>Effect of revocation of orders.</u> What do you think will be the effects on your firm and the U.S. market of any revocation of the countervailing and antidumping duty orders on imports of cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and/or Switzerland?

produced colddrawn mechanical tubing

Supply of colddrawn mechanical tubing imported from China

Supply of colddrawn mechanical tubing imported from other countries

Prices for cold-

drawn mechanical tubing

Overall U.S. demand for cold-drawn mechanical tubing

Raw material costs

for cold-drawn mechanical tubing

III-32.	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?

	•		, ,				
	Yes— Pleasimpact in the			No — Skip to next question.		on.	Don't know— Skip to next question.
Select c	Select one box per row.						
ı	Factor	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how the imposition of tariffs under section 301 affected each facto of the cold-drawn mechanical tubing market in the United States.
Supp	oly of U.S						

III-33.	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?

Yes— Please indicate the impact in the table below.	No— Skip to next question.	Don't know— Skip to next question.

Select one box per row.

select one box per it	J 111.					
Factor	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how the imposition of measures under section 232 affected each factor of the cold-drawn mechanical tubing market in the United States.
Supply of U.S produced cold- drawn mechanical tubing						
Supply of imported cold-drawn mechanical tubing						
Prices for cold- drawn mechanical tubing						
Overall U.S. demand for cold- drawn mechanical tubing						
Raw material costs for cold-drawn mechanical tubing						

PART IV.--PRODUCT COMPARISIONS

IV-1. <u>Interchangeability.</u>—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 0 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
- 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			\times				
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-2. <u>Factors other than price</u>.—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 purchases of the products?

Please indicate A, F, S, N, or 0 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		><	\times				
Italy				\backslash			
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-3. Factor country comparisons.-- For the factors listed below, please rate how cold-drawn mechanical tubing produced in each country you with which you are familiar, as reported in your response to question II-4, compares with cold-drawn mechanical tubing produced in each of the other countries with which you are familiar.

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

	<u>Uni</u> cor	duct fr ited Sta mpared duct fr China	ites I to	<u>Uni</u> cor pro	oduct fr ited Sta mpared oduct fr German	ites I to om	<u>Uni</u> coi	duct fr ted Sta npared duct fr India	ites I to
Factor	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability									
Delivery terms									
Delivery time									
Discounts offered									
Minimum quantity requirements									
Packaging									
Payment terms									
Price ¹									
Product consistency									
Product range									
Quality meets industry standards									
Quality exceeds industry standards									
Reliability of supply									
Technical support/service									
U.S. transportation costs ¹									
¹ A rating of "superior" on price and U.S. transportation costs indicates that the first country generally has lower									

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

IV-3. **Continued.**

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

	<u>Uni</u>	oduct fr ited Sta mpared oduct fr Italy	ites I to	<u>Uni</u> cor pro	duct fr ited Sta npared duct fr uth Ko	ates I to om	Uni cor pro	duct fr ted Sta npared duct fr vitzerla	ites I to om
Factor	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability									
Delivery terms									
Delivery time									
Discounts offered									
Minimum quantity requirements									
Packaging									
Payment terms									
Price ¹									
Product consistency									
Product range									
Quality meets industry standards									
Quality exceeds industry standards									
Reliability of supply									
Technical support/service									
U.S. transportation costs ¹									
¹ A rating of "superior" on price and U.S. transportation costs indicates that the first country generally has lower									

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

Continued. IV-3.

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

Product from <u>United States</u> compared to product from <u>other sources</u>							
Factor	Superior	Comparable	Inferior				
Availability							
Delivery terms							
Delivery time							
Discounts offered							
Minimum quantity requirements							
Packaging							
Payment terms							
Price ¹							
Product consistency							
Product range							
Quality meets industry standards							
Quality exceeds industry standards							
Reliability of supply							
Technical support/service							
U.S. transportation costs ¹							
¹ A rating of "superior" on price and U.S. trans	portation costs indicate	es that the first country	generally has lower				

prices/U.S. transportation costs than the second country.

PART V.—ADDITIONAL INFORMATION

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

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 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.

• <u>Upload via Secure Drop Box</u>.—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: CDM1

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

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

<u>Parties to this proceeding</u>.—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.