

U.S. PRODUCERS' QUESTIONNAIRE

2,4-DICHLOROPHENOXYACETIC ACID (2,4-D) FROM CHINA AND INDIA

This questionnaire must be received by the Commission by **March 28, 2024**

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 countervailing and antidumping duty investigations concerning 2,4-Dichlorophenoxyacetic Acid ("2,4-D") from China and India (Inv. Nos. 701-TA-710-711 and 731-TA-1673-1674 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm _____

Address _____

City _____ State _____ Zip Code _____

Website _____

Has your firm produced 2,4-D (as defined on next page) in the United States at any time since January 1, 2021?

☐ **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's secure submission portal by clicking on the following link: <https://usitc.gov/qportal>. (PIN: **PLANT**). 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 conducted by the Commission on the same or similar merchandise.

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background. —This proceeding was instituted in response to petitions filed on March 14, 2024, by Corteva Agriscience LLC, Indianapolis, Indiana. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce (“Commerce”) makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at https://usitc.gov/reports/active_import_injury_questionnaires.
<https://ids.usitc.gov/case/8184/investigation/8537>.

2,4-D covered by this proceeding is 2,4-dichlorophenoxyacetic acid (“2,4-D”). 2,4-D has the Chemical Abstracts Service (“CAS”) registry number of 94-75-7 and the chemical formula $C_8H_6Cl_2O_3$. The 2,4-D component of any derivative products of 2,4-D, including but not limited to, amine salt and ester forms of 2,4-D are covered by the scope of the order.

Salt and ester forms of 2,4-D include, but are not limited to, 2,4-D salt (CAS 2702-72-9), 2,4-D diethanolamine salt (CAS 5742-19-8), 2,4-D dimethyl amine salt (CAS 2008-39-1), 2,4-D-isopropylamine salt (CAS 5742-17-6), 2,4-D triisopropanolamine salt (CAS 32341-80-3), 2,4-D BEE (CAS 1929-73-3), 2,4-D 2-ethylhexylester (CAS 1928-43-4), and 2,4-D -isopropylester (CAS 94-11-1). All 2,4-D, as well as the 2,4-D component of its salt and ester forms, is covered by the scope irrespective of purity, particle size, or physical form.

The conversion of a 2,4-D salt or ester from a subject 2,4-D acid, or the formulation of nonsubject merchandise with the subject 2,4-D, its salts, and its esters in the country of manufacture or in a third country does not remove the subject 2,4-D, its salts, or its esters from the scope. For any such formulations, only the 2,4-D, 2,4-D salt, and 2,4-D ester components of the mixture is covered by the scope of the order.

2,4-D, its salts, and its esters are currently imported under statistical reporting number 2918.99.2010 of the Harmonized Tariff Schedule of the United States (HTSUS). Other merchandise subject to the current scope, including the abovementioned formulations that may be imported under HTSUS statistical reporting numbers 3808.93.0500 and 3808.93.1500. The HTSUS provisions and CAS registry numbers 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, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

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

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

Release of information.—The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of 2,4-D and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

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

I-1a. **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

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.

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

☐ Yes ☐ No

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

"Establishment"—Each facility of a firm involved in the production of 2,4-D, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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

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

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

Law firm:	
Lead attorney(s):	

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

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

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

Country	Investigation 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"/>
India	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

Firm name	Country	Extent of ownership (percent)

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

- I-6. **Related importers/exporters.** — Does your firm have any related firms, either domestic or foreign, that are engaged in importing 2,4-D from China and/or India into the United States or that are engaged in exporting 2,4-D from China and/or India to the United States?

☐ No ☐ Yes—List the following information.

Firm name	Country	Affiliation

- I-7. **Related producers.** —Does your firm have any related firms, either domestic or foreign, that are engaged in the production of 2,4-D?

☐ No ☐ Yes—List the following information.

[illegible]

PART II.—TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Charles Cummings (202-708-1666, Charles.Cummings@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 2,4-D since January 1, 2021.

<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 2,4-D? 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 2,4-D.
<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 2,4-D, 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 2,4-D capacity" – The level of production of 2,4-D 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 2,4-D based on the actual product mix experienced over the period.

"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.

Takes into account	Installed overall capacity	Practical overall capacity	Practical 2,4-D 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 2,4-D	No	No	Yes

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

Quantity (in 1,000 pounds)			
Item	Calendar year		
	2021	2022	2023
Capacity measures:			
Installed overall capacity ¹			
Practical overall capacity ^{1 2}			
Practical 2,4-D capacity ^{3 4}	0	0	0
Production of:			
2,4-D: Dry weight acid equivalent basis ^{3 4}	0	0	0
Rest of the weight of the in-scope 2,4-D products:			
Subtotal, gross weight for 2,4-D products	0	0	0
Other products ⁵			
Total production using same machinery or workers	0	0	0

¹ 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.

² 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.

³ Data for this indicator will populate here once reported below in question II-8.

⁴ Data reported for practical 2,4-D capacity should be greater than the data reported for production of 2,4-D 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 2,4-D then "practical overall" and "practical 2,4-D" capacity measures should be equal to each other.

⁵ 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 production capacities reported in II-3a, and explain any changes in reported capacities.

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- II-3d. **Practical overall capacity 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 2,4-D.

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- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between 2,4-D 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.

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

Item	✓ if Yes
Are all three capacity measures reported based on <u>currently installed machinery and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	<input type="checkbox"/>
Are practical overall capacity and practical 2,4-D 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 2,4-D capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical 2,4-D 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 2,4-D 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. **Tolling.** —Since January 1, 2021, has your firm been involved in a toll agreement regarding the production of 2,4-D?

"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.

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

Does your firm act as the toller or tollee in this arrangement?	Toller: <input type="checkbox"/>	Tollee: <input type="checkbox"/>
Report the share of your firm's production of 2,4-D that was included in this toll arrangement in 2023.	%	
Please describe the activities performed in this tolling arrangement:		
Please indicate the name(s) of the firm(s) involved:		

II-7. Foreign trade zones. —

- (a) **Firm's FTZ operations.** —Does your firm produce 2,4-D in and/or admit 2,4-D 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 2,4-D into a foreign trade zone (FTZ) for use in distribution of 2,4-D and/or the production of downstream articles?

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

- II-8. **Shipments and inventory data.** —Report you firm's uses (shipment or storage) of domestically produced 2,4-D 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 (excluding swap shipments) 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 including product transferred to your retail locations or warehouses for eventual retail level sales. 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.

“Swaps”—For the purpose of this proceeding, shipments made in transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreements with other entities. Report the value inclusive of the “in kind” value of any goods or services received plus the net monetary transfer value in the swap transactions. Include all shipments to swap partners, even if the volume of 2,4-D to swap partner(s) was beyond the agreement(s).

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

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

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

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

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

Quantity (in 1,000 pounds dry weight acid equivalent) and value (in \$1,000)			
Item	Calendar year		
	2021	2022	2023
Practical 2,4-D capacity ¹ (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production ¹ (quantity) (C)			
U.S. shipments:			
Commercial shipments:			
Quantity (D)			
Value (E)			
Swap shipments: ²			
Quantity (F)			
Value ² (G)			
Internal consumption: ³			
Quantity (H)			
Value ³ (I)			
Transfers to related firms: ³			
Quantity (J)			
Value ³ (K)			
Export shipments: ⁴			
Quantity (L)			
Value (M)			
End-of-period inventories (quantity) (N)			
<p>¹ Report your firm's practical 2,4-D capacity consistent with the definitions provided in question II-3a above.</p> <p>² Please (1) identify the companies from which your firm receives the goods or services in-kind, (2) indicate the particular goods or services in-kind received pursuant to your swap transactions, and (3) quantify any net monetary exchange included in the swap transactions in each calendar year: ____.</p> <p>³ Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p>⁴ Identify your firm's principal export markets: ____.</p>			

II-8. **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 P) 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, J, and L). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar year		
	2021	2022	2023
B + C – D – F – H – J – L – P = should equal zero ("0") or provide an explanation. ¹	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.			

II-9. **Channels of distribution.** —Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, transfers to related firms, and swaps) of U.S.-produced 2,4-D by channel of distribution.

Quantity (in 1,000 pounds dry weight acid equivalent)			
Item	Calendar year		
	2021	2022	2023
Channels of distribution:			
U.S. shipments:			
To distributors (O)			
To end users (including formulators) (P)			

RECONCILIATION OF CHANNELS. —Please ensure that the quantities reported for channels of distribution (i.e., lines Q and R) 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	Calendar year		
	2021	2022	2023
Q + R – D – F – H – J = zero ("0"), if not revise.	0	0	0

- II-10. **U.S. shipments by form:** —Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, transfers to related firms, and swaps) of U.S.-produced 2,4-D by chemical form in calendar year 2023.

Quantity (in 1,000 pounds dry weight acid equivalent)	
Item	Calendar year 2023
U.S. shipments. —	
2,4-dichlorophenoxyacetic acid (Q)	
2,4-D dimethylamine salt (R)	
2,4-D 2-ethylhexyl ester (S)	
All other products (T) ¹	
¹ List in order of commercial importance (quantity) the other products shipped by your firm: _____.	

RECONCILIATION OF U.S. SHIPMENTS BY TYPE. —Please ensure that the data reported for U.S. shipments by type (i.e., lines S through V) in 2023 equal the data reported for U.S. shipments (i.e., lines D, F, H, and J) in table II-8 in 2023. 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 2023
Quantity: $Q + R + S + T + - D - F - H - J =$ should equal zero ("0")	0

- II-11. **Captive production use.** — Please report the share of your firm's internal consumption and transfers to related firms for the uses identified below. These data should reconcile with quantities reported in question II-8 (lines F and H).

Quantity (in 1,000 pounds dry weight acid equivalent)			
Item	Calendar year		
	2021	2022	2023
Internal consumption:			
Subsequently sold as is, i.e., as 2,4-D (merchandise was diverted back into the market for 2,4-D) (U)			
Subsequently processed (i.e., into a downstream product) ¹ (V)			
Transfers to related firms:			
Subsequently sold as is, i.e., as 2,4-D (merchandise was diverted back into the market for 2,4-D) (W)			
Subsequently processed (i.e., into a downstream product) ¹ (X)			
¹ Please identify/describe the downstream products: .			

RECONCILIATION OF CAPTIVE PRODUCTION USE. — The sum of the data reported above should be equal to the data reported in in question II-8. 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		
	2021	2022	2023
Quantity: U + V – H = should equal zero ("0")	0	0	0
Quantity: W + X – J = should equal zero ("0")	0	0	0

- II-12. **2,4-D share contribution to downstream product.** —Did your firm or a related firm produce other downstream products using your firm's U.S.-produced 2,4-D in 2023?

No	Yes	If yes: please report the share that 2,4-D accounts for of the downstream product. Do not include conversion costs in your calculations.
<input type="checkbox"/>	<input type="checkbox"/>	

Calendar year 2023		
Material inputs used in downstream production	Share of <u>value</u> accounted for in downstream product (percent)	Share of the <u>quantity</u> accounted for in downstream product (percent)
2,4-D		
All other material inputs		
Total (should sum to 100.0%)	0	0

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

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- II-14. **Swaps.** —If your firm reported swaps to/with another entity in question II-8, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what U.S. merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and where). Also indicate how the value of the swaps were reported in II-8 including estimates for the non-monetary portions of the swap transactions as well as the monetary portions.

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- II-15. **Employment data.** —Report your firm's employment-related data related to the production of 2,4-D and provide an explanation for any trends in these data.

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

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

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

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

Item	Calendar year		
	2021	2022	2023
Average number of PRWs (<i>number</i>)			
Hours worked by PRWs (<i>1,000 hours</i>)			
Wages paid to PRWs (<i>\$1,000</i>)			

Explanation of trends:

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II-16. **Purchases.** —Has your firm purchased 2,4-D produced in the United States or in other countries since January 1, 2021? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

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

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

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

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

(Quantity in 1,000 pounds dry weight acid equivalent)			
Item	Calendar year		
	2021	2022	2023
Purchases from U.S. importers of 2,4-D from—			
China			
India			
Subject sources	0	0	0
All other sources ¹			
Purchases from domestic producers²			
Purchases from other sources³			
Purchases from all sources	0	0	0
¹ Please list the name of the nonsubject importer(s) from which your firm purchased this product: _____. ² Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. ³ Please list the name of the firm(s) from which your firm purchased this product: _____.			

[illegible]

II-17. **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		
	2021	2022	2023
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0

II-18. **Imports.** —Since January 1, 2021, has your firm imported 2,4-D?

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

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

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PART III.—FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Joanna Lo (202-205-1888, joanna.lo@usitc.gov).

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

Name	
Title	
Email	
Telephone	

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

- A1. When does your firm's fiscal year end (month and day)? _____
If your firm's fiscal year changed since January 1, 2021, explain below:

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

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

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include 2,4-D:

- B.2. Does your firm prepare profit/loss statements for 2,4-D:

☐ 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. **Swap accounting.**—From the perspective of revenue and cost, please describe the company’s routine accounting treatment of 2,4-D swaps, including both non-monetary and monetary exchanges as part of an agreement with an unrelated entity since January 1, 2021.

“Swaps”—For the purpose of this proceeding, shipments made in transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreements with other entities. Report the value inclusive of the “in kind” value of any goods or services received plus the net monetary transfer value in the swap transactions. Include all shipments to swap partners, even if the volume of 2,4-D to swap partner(s) was beyond the agreement(s).

“Swaps” include arms-length transactions based on contractual obligations with unrelated entities (e.g., bartering and/or cross-supply agreements).

For “swaps” please describe the basis, as recorded in your company’s own accounting system, of the swap cost from the unrelated entity; e.g., fair market value (“FMV”), surrogate value, actual cost, cost plus, negotiated price to approximate fair market value.

As applicable, please describe how the company’s routine accounting treatment differs from the manner in which swaps are reported in question III-9a (overall market) and III-9g (swaps).

Note: If your firm had swap arrangements with more than two swap partners, please submit the same responses for each additional swap partner on a blank sheet or contact joanna.lo@usitc.gov.

III-4. **Swap accounting.**—Continued

Swap item	Swap partner name	
	Company 1:	Company 2:
Non-monetary exchanges (include how differences in swap volumes are resolved each year, how freight costs are recorded, and frequency of exchanges):		
Monetary or financial exchange for materials (include how volumes are established, delivered, and paid each year):		
Swap ratio(s):		
Describe the underlying basis of the swap ratio(s) and identity the factors that are most subject to change and why:		
Swap volume determination (include changes since January 1, 2021):		
Swap valuation in your firm's accounting books and records (include relevant GAAP rules):		
Swap valuation as reported in questions III-9a on the overall market (if different than internal records): If the valuation is not reported as FMV, please explain.		
Date (month and year) the swap agreement was established:		
Have swap agreements changed since January 1, 2021? If yes, explain the primary reasons for the change.		
Additional explanations:		

- III-5. **Product listing.**—Please list the products your firm produces in the facilities in which it produces 2,4-D and provide the share of net sales accounted for by these products in 2023.

Products	Share of sales in 2023
2,4-D (all forms)	%
	%
	%
	%
	%

- III-6. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of 2,4-D 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-7a. ☐ No—Continue to question III-8a.

- III-7a. **Inputs from related suppliers.**—Please identify the inputs used in the production of 2,4-D that your firm purchases from related suppliers and that are reflected in questions III-9a (overall market), III-9b (open market), and III-9c (swap market). For “Share of total COGS” please report this information by relevant input for 2023.

Input	Related supplier	Share of total COGS in 2023
		%
		%
		%
		%

- III-7b. **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-7c. **Inputs from related suppliers valuation method.**—Please confirm that the inputs purchased from related suppliers, as identified in III-6, were reported in questions III-9a/III-9b/III-9c 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 questions III-9a/III-9b/III-9c.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-8a. **Overall market (III-9a): Cost assignment/allocation basis.**—Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for 2,4-D in the normal course of business and in the overall market financial results reported in question III-9a (e.g., actual costs, standard costs, percentage of COGS, percentage of sales, etc.).

Cost/expense	Assignment/allocation bases used for 2,4-D—	
	In the normal course of business	In the financial results at III-9a (overall market)
Raw materials		
Direct labor		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		

- III-8b. **Open market (III-9f): Cost assignment/allocation basis.**—Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for 2,4-D in the normal course of business and in the open market financial results reported in question III-9f (e.g., actual costs, standard costs, percentage of COGS, percentage of sales, etc.).

Cost/expense	Assignment/allocation bases used for 2,4-D—	
	In the normal course of business	In the financial results at III-9f (open market)
Raw materials		
Direct labor		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		

- III-8c. **Allocation methodology (both overall and open markets).**—Briefly describe the methodology used to allocate revenues and costs related to the operations of 2,4-D reported in the overall market (question III-9a) and open market (question III-9f).

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- III-8d. **Blended (or formulated): Sales of blended 2,4-D and allocation basis.**—Did your firm have any sales of blended formulations that included 2,4-D at any time since January 1, 2021? If yes, describe the methodology used to allocate net sales quantities, net sales revenues, and cost items to only the in-scope 2,4-D content of such sales in questions III-9a and/or III-9f (if not already provided in questions III-8a/III-8b/III-8c above).

No	Yes	If yes—Describe the methodology used to allocate net sales quantities, net sales revenues, and cost items to only the in-scope 2,4-D (i.e., describe how your firm removed all out-of-scope product(s) in the data provided in questions III-9a/III-9f).
<input type="checkbox"/>	<input type="checkbox"/>	

- III-8e. **Sales quantity conversion(s).**—Did your firm use conversion methodologies to report sales quantity data in 1,000 pounds dry weight in questions III-9a and/or III-9f?

No	Yes	If yes—Describe briefly the methodology used to convert sales quantity to 1,000 pounds dry weight.
<input type="checkbox"/>	<input type="checkbox"/>	

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 2,4-D, as well as specific statements and worksheets) used to compile these data.

III-9a. **Overall operations on 2,4-D.**—Report the revenue and related cost information requested below on the 2,4-D overall operations of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing overall operations. Do not report any revenue or cost data related to the resale of purchased product.

"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.

"Commercial sales to non-swap entities"—Report all commercial sales, whether these are domestic sales or exports. Report total net commercial 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. For the purpose of this proceeding, do not include commercial sales to swap partners listed in questions III-8a and/or III-8b, regardless of whether these sales were volumes or amounts beyond the swap and/or purchase agreements. Include commercial sales to companies with whom your firm does not have any agreement.

"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.

"Swaps"—For the purpose of this proceeding, shipments made in transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreements with other entities. Report the value inclusive of the "in kind" value of any goods or services received plus the net monetary transfer value in the swap transactions. Include all shipments to swap partners, even if the volume of 2,4-D to swap partner(s) was beyond the agreement(s).

Note: Transfers to related firms and internal consumption must be valued at FMV; swaps should be valued to approximate FMV.

"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.

"By-product"—If your firm has by-product revenue and/or disposal costs from the manufacturing of 2,4-D, please report the net of these revenue in the appropriate line item below.

"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.

III-9a. **Overall operations on 2,4-D.**—Continued.

Note: If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Joanna Lo at joanna.lo@usitc.gov before completing this section of the questionnaire.

Quantity (in 1,000 pounds dry weight acid equivalent) and value (in \$1,000)			
Item	Years		
	2021	2022	2023
Net sales quantities:			
Commercial sales to non-swap entities			
Internal consumption			
Transfers to related firms			
Swap transactions			
Total net sales quantities	0	0	0
Net sales values:			
Commercial sales to non-swap entities			
Internal consumption			
Transfers to related firms			
Swap transactions			
Total net sales values	0	0	0
Cost of goods sold (COGS):			
Raw materials			
Direct labor			
Other factory costs			
<u>Less:</u> By-product revenue/cost (net)			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
SG&A expenses			
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	0

- III-9b. **Overall market: Financial data reconciliation.**— Certain line items from question III-9a on the overall market (e.g., 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>If no—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>
Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	

- III-9c. **Overall market: Raw materials.**—Please report the share of total raw material costs in 2023 (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	Primarily from swap(s)
Chlorine		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phenol		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2,4-dichlorophenol		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chloroacetic acid		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phenoxyacetic acid		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other raw material inputs ¹		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total (should sum to 100 percent)	0.0			
¹ If there are notable or significant raw material inputs included within the “other raw material inputs” category, please list those here and provide the share of the total raw material costs accounted for by each other raw material input:				

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

Item	Years		
	2021	2022	2023
Depreciation expense (<i>in \$1,000</i>)			

- III-9e. **Overall market: 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.

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III-9f. **Open market operations on 2,4-D.**—Report the revenue and related cost information requested below on the 2,4-D open market operations of your firm's U.S. establishment(s). Include only open market sales (whether domestic or exports) and costs related to your U.S. manufacturing operations allocated to the open market sales. Do not report any revenue or cost data related to the resale of purchased or swapped product.

Commercial sales to non-swap entities quantities and values—Data is automatically calculated from question III-9a response.

Costs and expenses—Include costs and expenses associated with reported total net commercial sales to non-swap entities only (i.e., for both domestic and export commercial sales). Allocate costs and expense to your firm's open market sales. If any freight costs were removed from net sales values, ensure the associated costs are removed from the applicable cost/expense line.

By-product—If your firm has by-product revenue and/or disposal costs from the manufacturing of 2,4-D, please report the net of these revenue/costs allocated to open market sales in the appropriate line item below.

Quantity (in 1,000 pounds dry weight acid equivalent) and value (in \$1,000)			
Item	Years		
	2021	2022	2023
Commercial sales to non-swap entities quantities	0	0	0
Commercial sales to non-swap entities values	0	0	0
Cost of goods sold (COGS):			
Raw materials			
Direct labor			
Other factory costs			
<u>Less:</u> By-product revenue/cost (net)			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
SG&A expenses			
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	0

III-9g. **Swap operations on 2,4-D.**—Report the revenue and related cost information requested below on the 2,4-D swap operations of your firm's U.S. establishment(s). Include only swap transactions (whether domestic or exports) and costs related to your U.S. manufacturing operations allocated to the swap transactions. Do not report any revenue or cost data related to the resale of purchased product.

Quantity (in 1,000 pounds dry weight acid equivalent) and value (in \$1,000)			
Item	Years		
	2021	2022	2023
Swap transactions quantities (from III-9a)	0	0	0
Swap transactions values (from III-9a)	0	0	0
Cost of goods sold (COGS):			
Raw materials			
Direct labor			
Other factory costs			
<u>Less:</u> By-product revenue/cost (net)			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
SG&A expenses			
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	0

III-9h. **Financial data checklist for both overall and total markets.**—Please check that the financial data in questions III-9a (overall market) and III-9f (open market) have been correctly reported.

Confirm the following regarding your financial data in question III-9a and/or III-9f:	✓ if Yes
{Applies to III-9a only} Total net sales values in III-9a are net of (i.e., less) any discounts, returns, or allowances to customers?	<input type="checkbox"/>
{Applies to III-9a only} Total net sales values in III-9a do not include prepaid freight costs or other freight costs to customers from your U.S. point of shipment?	<input type="checkbox"/>
{Applies to III-9a only} Internal consumption and transfers are reported at fair market value?	<input type="checkbox"/>
{Applies to III-9a only} Internal consumption and transfers are net of (i.e., less) any discounts, returns, or allowances to customers?	<input type="checkbox"/>
{Applies to III-9a only} Internal consumption and transfers exclude prepaid freight costs and any other freight costs to customers from your U.S. point of shipment?	<input type="checkbox"/>
{Both III-9a and III-9f} COGS excludes finished goods freight to customers?	<input type="checkbox"/>
{Both III-9a and III-9f} SG&A excludes finished goods freight to customers?	<input type="checkbox"/>
{Both III-9a and III-9f} All costs exclude finished goods freight to customers?	<input type="checkbox"/>
{Applies to III-9f only} All costs and expenses are allocated to your firm's open market sales?	<input type="checkbox"/>
{Applies to III-9f only} Swap transactions are excluded ?	<input type="checkbox"/>
{Applies to III-9g only} Swap transactions are valued at FMV ?	<input type="checkbox"/>
If you did not ✓ Yes in any of the boxes above, go back to the relevant question(s) and revise your response or provide an explanation:	

III-10a. **Nonrecurring items (charges and gains) included in the 2,4-D financial results for III-9a/III-9f/III-9g.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question III-9a, III-9f, and/or III-9g. If a nonrecurring item that is not product-specific was allocated to the results at question III-9a, III-9f, and/or III-9g, 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 2,4-D in questions III-9a, III-9f, and/or III-9g.

Item	Years		
	2021	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 2,4-D financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item in which the nonrecurring item is classified.

	Description of the nonrecurring item	Location (i.e., line item) in III-9a, III-9f, and/or III-9g
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 (overall market), III-9f (open market), and/or III-9g (swaps) where these items are reported.

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III-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of 2,4-D. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for 2,4-D 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 questions III-9a (overall market) and/or III-9f (open market).

Note: Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to 2,4-D if these assets are also related to other products. **DO NOT INCLUDE LIABILITIES.**

Value (in \$1,000)			
Item	Years		
	2021	2022	2023
Total assets (net)			

III-12b. **Description of asset values.**—Please provide explanations for any substantial changes in total asset value from 2021 to 2023; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term; e.g., cash, account receivables, allowances, inventories, PP&E, accumulated depreciation, and intangible assets) included in the above response.

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- III-13a. **Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and R&D expenses for 2,4-D.

Value (in \$1,000)			
Item	Years		
	2021	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.

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

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III-14a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question III-9a should reconcile with the total shipments reported in question II-8 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis.

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

Reconciliation	Years		
	2021	2022	2023
Quantity: Trade data from question II-8 (lines D, F, H, J, and L) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
Value: Trade data from question II-8 (lines E, G, I, K, and M) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

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

☐ Yes— Complete question III-14b. ☐ No— Continue to question III-15.

III-14b. **Data consistency and reconciliation (calendar-year based financial data).**— Do the data in question III-9a reconcile with the data in question II-8 (i.e., the calculated fields are returning zeros in the table above) for all periods?

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

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

- III-15. **Effects of imports on investment.**—Since January 1, 2021, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of 2,4-D from China and/or India?

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

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

- III-16. **Effects of imports on growth and development.**—Since January 1, 2021, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of 2,4-D from China and/or India?

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

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

- III-17. **Anticipated effects of imports.**—Does your firm anticipate any negative effects due to imports of 2,4-D from China and/or India?

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

- III-18. **Effects on financial performance of COVID-19.**—Has the COVID-19 pandemic, or any government actions taken to contain the spread of the COVID-19 virus, affected the financial performance of your firm's operations on 2,4-D as reported in question III-9a? In your response, please include the duration and timing of any impacts as they relate to your firm's financial performance.

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

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

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PART IV.—PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Hau Nguyen (202-708-1441, Hau.Nguyen@usitc.gov).

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

Name	
Title	
Email	
Telephone	

PRICE DATA

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2021 of the following products produced by your firm.

Product 1.— 2,4-D acid, Form: white to brown crystalline solid

Product 2.— 2,4-D salt, Form: white or cream-colored power

Product 3.— 2,4-D salt, Form: amber aqueous liquid

Product 4.— 2,4-D 2-ethylhexylester ("EHE"), Form: dark amber liquid

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 2021-December 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"/>	Yes. —Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	No. —Skip to question IV-3.

IV-2b. **Price data.**—Report below the quarterly price data¹ for pricing products² produced and sold by your firm excluding swap sales.

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

(Quantity in 1,000 pounds dry weight acid equivalent, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2021:								
January-March								
April-June								
July-September								
October-December								
2022:								
January-March								
April-June								
July-September								
October-December								
2023:								
January-March								
April-June								
July-September								
October-December								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:

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

Are the price data reported above:	✓ if Yes
In actual dollars (not \$1,000) and 1,000 pounds dry weight acid equivalent?	<input type="checkbox"/>
Valued f.o.b. U.S. point of shipment (i.e., exclude U.S. inland transportation costs)?	<input type="checkbox"/>
Reported net of all discounts, rebates, and returns (deducted from the quarter in which the original sale occurred)?	<input type="checkbox"/>
Reported for commercial U.S. shipments only (i.e., exclude internal consumption, transfers, and exports)?	<input type="checkbox"/>
Less than or equal to the quantities and values reported in part II for commercial U.S. shipments in each period?	<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 2,4-D (*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 2,4-D 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 2,4-D in 2023 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 2023 sales	%	%	%	%	0.0 %

IV-7. **Contract provisions.**—Please fill out the table regarding your firm's typical sales contracts for U.S.-produced 2,4-D (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 ¹	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"/>
¹ Please identify the indexes used: _____.				

IV-8. **Lead times.**—What is your firm's share of sales of its U.S.-produced 2,4-D 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 2,4-D?

Source	Share of 2023 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (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 2,4-D that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (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 2,4-D since January 1, 2021 (check all that apply)?

Geographic area	✓ if applicable
Northeast. —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
Midwest. —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
Southeast. —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
Central Southwest. —AR, LA, OK, and TX.	<input type="checkbox"/>
Mountains. —AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
Pacific Coast. —CA, OR, and WA.	<input type="checkbox"/>
Other. —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 2,4-D that is accounted for by U.S. inland transportation costs? _____ percent

IV-12. **End uses.**—List the end uses of the 2,4-D that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by 2,4-D and other inputs?

End-use product	Share of total cost of end use product accounted for by		Total (should sum to 100.0% across)
	2,4-D	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-13. **Substitutes.**—Can other products be substituted for 2,4-D?

☐ No

☐ Yes—Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for 2,4-D?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

IV-14. **Demand trends.**— Has demand within the United States and outside of the United States (if known) for 2,4-D steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021? Explain any trends and describe the principal factors that have affected these changes in demand.

Select one box per row.

Market	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explanation and factors
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-15. **Product changes.**—Have there been any significant changes in the product range, product mix, or marketing of 2,4-D since January 1, 2021?

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

- IV-16. **Business cycles.**—Is the 2,4-D 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, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-17. **Conditions of competition.**—Is the 2,4-D market subject to conditions of competition distinctive to 2,4-D 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, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Supply constraints.**—Has your firm refused, declined, or been unable to supply 2,4-D at any time between January 1, 2021 (examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

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

- IV-19. **Raw materials.**— Have 2,4-D raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021?

Select one box per row.

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 2,4-D.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-20. **Interchangeability.**—How often is 2,4-D 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	India	Other countries
United States			
China			
India			
For any country-pair producing 2,4-D that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of 2,4-D produced in the countries:			

IV-21. **Factors other than price.**—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between 2,4-D produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	India	Other countries
United States			
China			
India			
For any country-pair for which factors other than price are <i>always</i> or <i>frequently</i> a significant factor in your firm's sales of 2,4-D, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:			

- IV-22. **Role of section 301 tariffs.**— Did the tariffs on Chinese-origin products under section 301, or changes in these tariffs, have an impact on the 2,4-D market in the United States, including any effects on 2,4-D cost, price, supply, and/or demand, since January 1, 2021?

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

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

IV-23. **Customer identification.**—List the names and contact information for your firm's 10 largest U.S. customers for 2,4-D since January 1, 2021. Indicate the share of the quantity of your firm's U.S. shipments of 2,4-D that each of these customers accounted for in 2023.

Customer's name		Contact person	Email	Telephone	City	State	Share of 2023 sales (%)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

IV-24. **Competition from imports.—**

- (a) **Lost revenue.**—Since January 1, 2021: To avoid losing sales to competitors selling 2,4-D from China and/or India, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

- (b) **Lost sales.**—Since January 1, 2021: Did your firm lose sales of 2,4-D to imports of this product from China and/or India?

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

- (c) **The submission of lost sales/lost revenue allegations is to be completed only by NON-PETITIONERS.**

If your firm indicated “yes” to any of the above, your firm can provide the Commission with additional information by downloading and completing the lost sales/lost revenues worksheet at http://usitc.gov/trade_remedy/question.htm. Note that the Commission may contact the firms named to verify the allegations reported.

Is your firm submitting the lost sales/lost revenues worksheet?

<input type="checkbox"/>	No—Please explain.
<input type="checkbox"/>	Yes—Please complete the worksheet and submit via the Commission dropbox. https://dropbox.usitc.gov/oinv/ . (PIN: PLANT)

- IV-25. **Other explanations.**—If your firm would like to further explain a response to a question in Part IV for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

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HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at: <https://ids.usitc.gov/case/8184/investigation/8537>.

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 Commission’s secure submission portal.** —The questionnaire must be uploaded in two formats: (1) a Microsoft Word 97-2003 document; and (2) a PDF copy of the complete questionnaire with a signature on the first page. Please include any attachments at the end of the PDF (e.g., APO certification, additional comments, etc.).

Web address: <https://usitc.gov/qportal>

Pin: PLANT

- **E-mail.** —E-mail the MS Word questionnaire to Charles.Cummings@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).