U.S. PRODUCERS' QUESTIONNAIRE

CRYSTALLINE SILICON PHOTOVOLTAIC CELLS, WHETHER OR NOT ASSEMBLED INTO MODULES, FROM CAMBODIA, MALAYSIA, THAILAND, AND VIETNAM

This questionnaire must be received by the Commission by May 8, 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 crystalline silicon photovoltaic cells, whether or not assembled into modules ("CSPV cells and modules"), from Cambodia, Malaysia, Thailand, and Vietnam (Inv. Nos. 701-TA-722-725 and 731-TA-1690-1693 (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)).

Address _

City			State	Zip Code		
Website_						
	rm produced CSF ary 1, 2021?	PV cells and/or modul	es (as defined on	next page) in t	the United States	at any time
☐ NO	(Sign the cert	ification below and pror	nptly return only th	nis page of the q	uestionnaire to the	Commission)
☐ YES	(Complete all	parts of the questionna	ire, and return the	entire question	naire to the Commis	ssion)
•		a the U.S. Internation sitc.gov/qportal. (PI		•		
		CI	ERTIFICATION			
means of this certifi	cation I also gr I in this question	ant consent for the naire and throughou	Commission, an	d its employe	ees and contract	by the Commission. By personnel, to use the oceedings conducted by
proceeding or other p personnel (a) for dev reviews, and evalua Appendix 3; or (ii) by	proceedings may eloping or main tions relating to U.S. governmen	y be disclosed to and taining the records o the programs, per	l used: (i) by the f this or a relate sonnel, and ope tract personnel,	Commission, d proceeding, rations of th	its employees an or (b) in interna e Commission in	on and throughout this nd Offices, and contract of investigations, audits, ocluding under 5 U.S.C. es. I understand that al
Name of Authorized (Official	Title of Authorized C	Official		Date	
 Signature		Phone			Email address	

PART I.—GENERAL INFORMATION

Background.--This proceeding was instituted in response to a petition filed on May 24, 2024, by the American Alliance for Solar Manufacturing Trade Committee. 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. Pertinent information to this proceeding is available at:

Questionnaires: https://usitc.gov/reports/active import injury questionnaires. Other case information: https://usitc.gov/reports/active import injury questionnaires. Other case information: https://usitc.gov/reports/active import injury questionnaires.

<u>CSPV cells and modules</u> covered by this proceeding is crystalline silicon photovoltaic cells, and modules, laminates, and panels, consisting of crystalline silicon photovoltaic cells, whether or not partially or fully assembled into other products, including, but not limited to, modules, laminates, panels and building integrated materials.

These investigations cover crystalline silicon photovoltaic cells of thickness equal to or greater than 20 micrometers, having a p/n junction formed by any means, whether or not the cell has undergone other processing, including, but not limited to, cleaning, etching, coating, and/or addition of materials (including, but not limited to, metallization and conductor patterns) to collect and forward the electricity that is generated by the cell.

Merchandise under consideration may be described at the time of importation as parts for final finished products that are assembled after importation, including, but not limited to, modules, laminates, panels, building-integrated modules, building-integrated panels, or other finished goods kits. Such parts that otherwise meet the definition of merchandise under consideration are included in the scope of the investigations.

Excluded from the scope of the investigations are thin film photovoltaic products produced from amorphous silicon (a-Si), cadmium telluride (CdTe), or copper indium gallium selenide (CIGS).

Also excluded from the scope of the investigations are crystalline silicon photovoltaic cells, not exceeding 10,000mm² in surface area, that are permanently integrated into a consumer good whose function is other than power generation and that consumes the electricity generated by the integrated crystalline silicon photovoltaic cell. Where more than one cell is permanently integrated into a consumer good, the surface area for purposes of this exclusion shall be the total combined surface area of all cells that are integrated into the consumer good.

Additionally, excluded from the scope of the investigations are panels with surface area from 3,450 mm² to 33,782 mm² with one black wire and one red wire (each of type 22 AWG or 24 AWG not more than 206 mm in length when measured from panel extrusion), and not exceeding 2.9 volts, 1.1 amps, and 3.19 watts. For the purposes of this exclusion, no panel shall contain an internal battery or external computer peripheral ports.

Also excluded from the scope of the investigations are:

1. Off grid CSPV panels in rigid form with a glass cover, with the following characteristics: (A) a total power output of 100 watts or less per panel; (B) a maximum surface area of 8,000 cm² per panel; (C) do not include a built-in inverter; (D) must include a permanently connected wire that terminates in either an 8mm male barrel connector, or a two-port rectangular connector with two pins in square housings of different colors; (E) must include visible parallel grid collector metallic wire lines every 1-4 millimeters

across each solar cell; and (F) must be in individual retail packaging (for purposes of this provision, retail packaging typically includes graphics, the product name, its description and/or features, and foam for transport); and

2. Off grid CSPV panels without a glass cover, with the following characteristics: (A) a total power output of 100 watts or less per panel; (B) a maximum surface area of 8,000 cm² per panel; (C) do not include a built-in inverter; (D) must include visible parallel grid collector metallic wire lines every 1-4 millimeters across each solar cell; and (E) each panel is 1. permanently integrated into a consumer good; 2. encased in a laminated material without stitching, or 3. has all of the following characteristics: (i) the panel is encased in sewn fabric with visible stitching, (ii) includes a mesh zippered storage pocket, and (iii) includes a permanently attached wire that terminates in a female USB-A connector.

In addition, the following CSPV panels are excluded from the scope of the investigations: off-grid CSPV panels in rigid form with a glass cover, with each of the following physical characteristics, whether or not assembled into a fully completed off-grid hydropanel whose function is conversion of water vapor into liquid water: (A) A total power output of no more than 80 watts per panel; (B) A surface area of less than 5,000 square centimeters (cm²) per panel; (C) Do not include a built-in inverter; (D) Do not have a frame around the edges of the panel; (E) Include a clear glass back panel; and (F) Must include a permanently connected wire that terminates in a twoport rectangular connector.

Additionally excluded from the scope of these investigations are off-grid small portable crystalline silicon photovoltaic panels, with or without a glass cover, with the following characteristics: (1) a total power output of 200 watts or less per panel; (2) a maximum surface area of 16,000 cm² per panel; (3) no built-in inverter; (4) an integrated handle or a handle attached to the package for ease of carry; (5) one or more integrated kickstands for easy installation or angle adjustment; and (6) a wire of not less than 3 meters either permanently connected or attached to the package that terminates in an 8mm diameter male barrel connector.

Also excluded from the scope of these investigations are off-grid crystalline silicon photovoltaic panels in rigid form with a glass cover, with each of the following physical characteristics, whether or not assembled into a fully completed off-grid hydropanel whose function is conversion of water vapor into liquid water: (A) A total power output of no more than 180 watts per panel at 155 degrees Celsius; (B) A surface area of less than 16,000 square centimeters (cm²) per panel; (C) Include a keep-out area of approximately 1,200 cm² around the edges of the panel that does not contain solar cells; (D) Do not include a built-in inverter; (E) Do not have a frame around the edges of the panel; (F) Include a clear glass back panel; (G) Must include a permanently connected wire that terminates in a two-port rounded rectangular, sealed connector; (H) Include a thermistor installed into the permanently connected wire before the twoport connector; and (I) Include exposed positive and negative terminals at opposite ends of the panel, not enclosed in a junction box.

Modules, laminates, and panels produced in a third-country from cells produced in a subject country are covered by the investigations; however, modules, laminates, and panels produced in a subject country from cells produced in a third-country are not covered by the investigations.

Also excluded from the scope of these investigations are all products covered by the scope of the antidumping and countervailing duty orders on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China, 77 Fed. Reg. 73,018 (Dep't Commerce Dec. 7, 2012) (amended final deter. of sales at less than fair value, and antidumping duty order); and Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled Into Modules, from the People's Republic of China, 77 Fed. Reg. 73,017 (Dep't Commerce Dec. 7, 2012) (countervailing duty order).

Merchandise covered by the investigations is currently classified in the Harmonized Tariff System of the United States ("HTSUS") under statistical reporting numbers 8541.42.0010 and 8541.43.0010. Merchandise may also be imported under HTS subheadings 8501.71, 8501.72, and 8501.80 and statistical reporting number 8507.20.8010. These HTSUS subheadings are provided for convenience and customs purposes; the written description of the scope of the investigations is dispositive.

<u>CSPV cell.</u>--A crystalline silicon photovoltaic ("CSPV") cell converts sunlight to electricity and is the basic element of a module. The investigation covers CSPV cells of a thickness equal to or greater than 20 micrometers, having a p/n junction (or variant thereof) formed by any means, whether or not the cell has undergone other processing, including, but not limited to, cleaning, etching, coating, and/or addition of materials (including, but not limited to, metallization and conductor patterns) to collect and forward the electricity that is generated by the cell. Included are photovoltaic cells that contain crystalline silicon in addition to other photovoltaic materials. This includes, but is not limited to, passivated emitter rear contact ("PERC") cells, heterojunction with intrinsic thin-layer ("HIT") cells, and other so-called "hybrid" cells.

<u>CSPV module</u>.--A joined group of CSPV cells, regardless of the number of cells or the shape of the joined group, that are capable of generating electricity. The term "module" is frequently used interchangeably with the term "panel." A "laminate" is a module that does not have a frame.

Building integrated materials.--Materials integrated into the building envelope, such as the façade or roof, containing CSPV cells. These building integrated materials replace conventional construction materials, such as glass or roof shingles, taking over the function that conventional materials would otherwise perform while also producing electricity.

<u>Reporting of information</u>.--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.

<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 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.

<u>Release of information</u>.--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 CSPV cells and modules 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.

<u>D-GRIDS tool.</u>--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 macroenabled 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 <u>optional</u>. 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 55 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 releaseIn 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. <u>Establishments covered</u>.--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.

"<u>Establishment</u>"--Each facility of a firm involved in the production of CSPV cells and modules, 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. <u>Petitioner status.</u>--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

No	Yes

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

Country	Investigation type	Support	Oppose	Take no position
Cambodia	Antidumping duty			
Cambodia	Countervailing duty			
Malaysia	Antidumping duty			
Malaysia	Countervailing duty			
Thailand	Antidumping duty			
Thailand	Countervailing duty			
Vietnam	Antidumping duty			
Vietnam	Countervailing duty			
I-5. OwnershipIs your firm owned, in whole or in part, by any other firm? No YesList the following information, relating to the ultimate parent/owner.				
Firm nam	ie	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.

No Yes	List the following information.	
Firm name	Country	Affiliation
engaged in the produc	pes your firm have any related fir tion of CSPV cells and/or module List the following information.	
engaged in the produc	cion of CSPV cells and/or moduleList the following information.	s?
engaged in the produc	tion of CSPV cells and/or module	
engaged in the produc	cion of CSPV cells and/or moduleList the following information.	s?
engaged in the produc	cion of CSPV cells and/or moduleList the following information.	s?

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Julie Duffy (202-708-2579, julie.duffy@usitc.gov). **Supply all data requested on a <u>calendar-year</u> basis**.

II-1.	<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 Part II.

Name	
Title	
Email	
Telephone	

II-2a. <u>Changes in operations</u>.--Please indicate whether your firm has experienced any of the following changes in relation to the production of CSPV cells and modules since January 1, 2021. If the changes in operations are specific to CSPV cells or CSPV modules, please specify.

Check	as many as appropriate.	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
	Plant openings	
	Plant closings	
	Prolonged shutdowns	
	Production curtailments	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Weather-related or force majeure events	
	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 CSPV cells and modules? In
	your response, please discuss the duration and timing of any such changes as they relate to your
	firm's operations.

No	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 CSPV cells and modules.

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 CSPV modules, 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 <u>not</u> 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 CSPV modules capacity" – The level of production of CSPV modules 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 CSPV modules 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 CSPV modules 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 CSPV modules	No	No	Yes

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

Quantity (in kilowatts)			
	Calendar year		
Item	2021	2022	2023
Capacity measures: Installed overall capacity ¹			
Practical overall capacity ¹²			
Practical CSPV modules capacity ^{3 4}	0	0	0
Production of: CSPV modules ^{3 4}	0	0	0
Other products ⁵			
Total production using same machinery or	0	0	0
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 CSPV modules capacity should be greater than the data reported for production of CSPV modules 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 CSPV modules then "practical overall" and "practical CSPV modules" capacity measures should be equal to each other.

⁵ Please identify these products: _____.

U.S. Producers	' Questionnaire –	CSPV Cells and	Modules	(Preliminary)
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Hours per week	Weeks per year

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)
	Production bottlenecks	
	Existing labor force	
	Supply of material inputs	
	Fuel or energy	
	Storage capacity	
	Logistics/transportation	
	Other constraints (list the specific constraints in the description field)	

U.S. Producers' Questionnaire - CSPV Cells and Modules (Preliminary) Reaching installed overall capacity. -- Please describe and quantify the amount of time it would take II-3e. 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. II-3f. Excess installed overall capacity. -- To the extent that your company is reporting excess installed overall 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 CSPV modules. II-4. Product shifting.— Is your firm able to switch production (capacity) between CSPV modules and other products (a) using the same equipment and/or labor? If yes—(i.e., have produced other products or are able to produce other No Yes products) Please identify other actual or potential products. (b) Please describe the factors that affect your firm's ability to shift capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

II-5.	Capacity checklistPlease 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</u> <u>machinery and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	
Are practical overall capacity and practical CSPV modules 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)?	
Are practical overall capacity and practical CSPV modules capacity measures based on the actual availability of material inputs?	
Do both practical overall capacity and practical CSPV modules capacity measures account for <u>normal downtime, maintenance, repair and cleanup</u> activities?	
Does the difference between practical overall capacity and practical CSPV modules capacity equal the portion of practical overall capacity that is dedicated to the production of out-of-scope products?	

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. <u>Tolling</u>.--Since January 1, 2021, has your firm been involved in a toll agreement regarding the production of CSPV cells and modules?

"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	
		If yes—Please complete the table below.

Does your firm act as the toller or tollee in this arrangement?	Toller:	Tollee:
Report the share of your firm's production of CSPV cells and modul included in this toll arrangement in 2023.	es that was	%
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) <u>Firm's FTZ operations</u>.--Does your firm produce CSPV cells and modules in and/or admit CSPV cells and modules 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	If yesDescribe the nature of your firm's operations in FTZs and identify the specific FTZ site(s).

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

No	Yes	If yesIdentify the firms and the FTZs.	

II-8. **Production, shipments, and inventory data.--**Report your firm's uses (shipment or storage) of domestically produced CSPV modules during the specified periods.

"Assemblers of CSPV modules" -- Those U.S. firms that purchase or import CSPV cells and assemble CSPV modules in the United States.

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

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

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

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

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

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

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

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

II-8. Production, shipment, and inventory data: CSPV modules—Continued

If your firm produced CSPV <u>cells</u> at any time from January 1, 2021 to December 31, 2023, please contact Julie Duffy at <u>julie.duffy@usitc.gov</u>.

2022	2023

¹ Report your firm's practical CSPV modules capacity consistent with the definitions and instructions included in question II-3a.

² 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.

³ Identify your firm's principal export markets: _____

II-8. Production, shipment, and inventory data: CSPV modules—Continued

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

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

II-9. <u>Channels of distribution</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced CSPV modules by channel of distribution during the specified periods.

	Quantity (in kilow	vatts)	
		Calendar year	
Item	2021	2022	2023
Channels of distribution: U.S. shipments: To module assemblers (M)			
To distributors (N)			
To installers (O)			
To utilities/developers (P)	·		

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M through P) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, H) in each time period in part "a" of this 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.

		Calendar year	
Reconciliation	2021	2022	2023
M + N + O + P - D - F - H = zero ("0"),			
if not revise.	0	0	0

II-10. <u>U.S. shipments by module size (CSPV modules)</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced CSPV modules by configuration size during 2023.

Quantity (in k	cilowatts)
	Calendar year
Item	2023
U.S. shipments of CSPV modules:	
60-cell configuration (Q)	
72-cell configuration (R)	
Other products (S)	

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantities reported for U.S. shipments by cell configuration (i.e., lines Q, R, and S) in 2023 equal the quantity reported for U.S. shipments (i.e., line D, F, H) in 2023 in part "a" of this 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.

	Calendar year
Reconciliation	2023
Q + R + S – D - F- H = zero ("0"), if not revise.	0

Explanation of trends:

II-11. <u>Employment data: CSPV modules</u>.--Report your firm's employment-related data related to the production of CSPV modules 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.

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

	<u>Transfers to related firms</u> If your firm reported transfers to related firms in question II-7, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.
--	---

II-13. <u>Purchases</u>.--Has your firm purchased CSPV cells and/or modules 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.)

For products such as laminates, panels, and modules that are partially or fully assembled from CSPV cells, the location where the CSPV cells were manufactured determines the country of origin.

"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	If yesReport such purchases in the table below and explain the reasons for your firms' purchases.

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 kilowatts))				
	Calendar year					
Item	2021	2022	2023			
Purchases from U.S. importers of CSPV cells and modules from— Cambodia						
Malaysia						
Thailand						
Vietnam						
Subject sources	0	0	0			
All other sources ¹						
Purchases from domestic producers ²						
Purchases from other sources ³						
Purchases from all sources	0	0	0			

³ Please list the name of the firm(s) from which your firm purchased this product:

II-14. Purchases of imports from subject sources.--If your firm reported purchases from U.S. importers of CSPV cells and modules from Cambodia, Malaysia, Thailand, and/or Vietnam at any time since January 1, 2021, report those purchases by the individual importer of record and subject source.

Purchases of subject imports

Quantity (in kilowatts)						
		Calendar year				
Importer of record	Subject source	2021	2022	2023		
rand total:		0	0			

II-15. Purchases of imports from subject sources.—Continued.

<u>RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES</u>.--Please ensure that the quantities reported for your firms 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.

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

II-16. Imports.--Since January 1, 2021, has your firm imported CSPV cells and modules?

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

No	Yes	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

II-17.	Other explanationsIf your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

PART III.--FINANCIAL INFORMATION

Address questions on this	part of the o	uestionnaire to	Joanna Lo	(202-205-1888.	ioanna.lo@	Dusitc.gov)

in Par		ff may contact that individual regarding the confidential information submitted
Name		
Title		
Email		
Telep	hone	
<u>Accou</u>	inting sys	tem.—Briefly describe your firm's financial accounting system.
A.1.	When o	loes your firm's fiscal year end (month and day)?
		firm's fiscal year changed since January 1, 2021, explain below:
A.2.	(i.e., in <u>calenda</u> <u>fiscal-y</u> are pro	alendar-year data are required for the annual-year financial data in this section questions III-9a, III-9d, III-12a, and III-13a). However, if providing this data on a previous is unduly burdensome or provides results that are not reliable, the ear based data are acceptable. Please indicate whether the results in this section vided on a calendar-year basis (including firms with a calendar-year based fiscal on a fiscal-year basis that does not align with the calendar year.
	Cale	endar-year basis
B.1.		e the lowest level of operations (e.g., plant, division, company-wide) for which il statements are prepared that include CSPV cells and modules:
B.2.	Does yo	our firm prepare profit/loss statements for CSPV cells and modules:
B.3.		ndicate the type and frequency (if applicable) of financial statements prepared firm. Please check relevant items below.

		Frequency				
Financial statements	Check all that apply	Monthly	Quarterly	Semi- annually	Annually	
Audited						
Unaudited						
Annual reports						
SEC Forms 10-K / 10-Q						
SEC Form 20-F						
Other (specify):						

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

Accounting basis	Check one
U.S. GAAP	
IFRS	
Tax – cash	
Tax – accrual	
Other (specify):	

III-3.	cost, job order cost, etc.).

Questions III-4 to III-11 are limited to your firm's U.S. CSPV module operations in the United States only. If your firm produced and sold <u>CSPV cells</u> in the United States at any time from January 1, 2021 to December 31, 2023, please contact Joanna Lo at <u>joanna.lo@usitc.gov</u> prior to proceeding to question III-4.

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

Products	Share of sales in 2023
CSPV modules	%
	%
	%
	70
	%
	%

	baacers Q	uestioiiia	iie – CSF V C	tells and Modules (Preliminary)			Page 27
III-5.	<u>Inputs from related suppliers.</u> —Does your firm purchase inputs (raw materials, labor, energy, or any services) used in the production of CSPV cells and modules from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?						
	YesC	ontinue to	o question II	I-6. NoContinue to que	stion III-8	За.	
III-6.	and modu	ıles that y	our firm pur	 Please identify the inputs used inchases from related suppliers and please report this information be 	d that are	e reflected	in question
	Input			Related supplier		Share of t	
							%
							%
							%
							%
			If the basis	differs by input, please check all t	hat apply	y and expla	npany's own ain further in
	the narrat		If the basis	•	hat apply	y and expla	•
	the narrat	tive box.	Purchase co	•	hat apply		•
	the narrat	supplier's	Purchase co	differs by input, please check all t	hat apply		ain further in
	Related s	supplier's	Purchase co	differs by input, please check all t	hat apply		ain further in
	Related s Cost plus Negotiat	supplier's	Purchase co	differs by input, please check all t	hat apply		ain further in
	Related s	supplier's	Purchase co	differs by input, please check all t	hat apply		ain further in
	Related s Cost plus Negotiat Other (sp	supplier's sed transfe	Purchase co cost er price to ap	differs by input, please check all t	hat apply		ain further in
III-7b.	Related s Cost plus Negotiat Other (sp If the me	supplier's sed transfer pecify): ethods use	Purchase contemped differ by i	ost valuation method pproximate fair market value	ase confi	Check all	that apply
III-7b.	Related s Cost plus Negotiat Other (sp If the me	supplier's sed transfer pecify): ethods use	Purchase co cost er price to ap ed differ by i used for inp ated supplie nodules) in a	pst valuation method pproximate fair market value proximate fair market value	ase confir orted in I	Check all	that apply in in further in that apply in i
III-7b.	Related s Cost plus Negotiat Other (sp If the me Valuation purchased on CSPV orecords.	supplier's sed transference thods use method and method	Purchase co cost er price to ap ed differ by i used for inp ated supplie nodules) in a	pst valuation method pproximate fair market value proximate fair market value	ase confir orted in I	Check all	that apply in in further in that apply in i

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

	Assignment/allocation bases used for CSPV cells and modules—			
Cost/expense	In the normal course of business	In the financial results at III-9a		
Raw materials				
Direct labor				
Other factory costs				
SG&A expenses				
Interest expense				
Other income/expenses				

III-9a. <u>Operations on CSPV modules</u>.—Report the revenue and related cost information requested below on the CSPV cells and modules operations of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing operations. <u>Do not</u> 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.

Note: If the financial data are reported on a calendar-year basis, the total net sales quantities and values should match the total shipment quantities and values reported in Part II of this questionnaire (see question III-14 for a reconciliation grid).

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

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

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

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

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

III-9a. **Operations on CSPV modules**.—*Continued*

Quantity (in kilowatts) and value (in \$1,000)					
	Years				
Item	2021	2022	2023		
Net sales quantities:					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities	0	0	0		
Net sales values:					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0		
Cost of goods sold (COGS):					
Total raw materials (from III-9b)	0	0	0		
Direct labor					
Other factory costs					
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. Net sales by source of cells.—Report the quantity and value net sales of CSPV modules produced in the United States based on the source of the purchased and/or imported CSPV cells during the specified periods.

Value (in \$1,000)				
	Years			
Item	2020	2021	2022	
Net sales of CSPV modules made using: Domestic-origin CSPV cells Quantity				
Value				
Subject foreign-origin CSPV cells Quantity				
Value				
Nonsubject foreign-origin CSPV cells Quantity				
Value				
Total net sales quantity (matching table III-9a)	0	0	0	
Total net sales value (matching table III-9a)	0	0	0	

III-9c. Raw materials by type of input.—Provide a breakout of the relevant components of total raw material costs that will be populated in the "Total raw materials" line item in question III-9a.

Value (in \$1,000)				
		Years		
Item	2020	2021	2022	
Purchased or imported CSPV cells:				
Domestically-produced				
Subject foreign-produced				
Nonsubject foreign-produced				
Total cost of purchased/imported CSPV cells	0	0	0	
Other raw material costs:				
Backsheet costs				
Encapsulant (e.g., EVA) costs				
Framing costs				
Junction boxes costs				
Solar glass costs				
Other raw material costs				
Total all other raw material costs	0	0	0	
Total raw material costs (matching table III-9a	0	0	0	

U.S. Producers'	Questionnaire -	- CSPV Cells and	Modules	(Preliminary)
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III-9d. Variable costs and total manufacturing fixed costs.—Estimate the share of variable costs included in each item reported in question III-9a and report the total fixed manufacturing costs in 2023.

ltem	Share of 2023: COGS (percent)	Share of 2023: SG&A (percent)	
Share of costs that are:			
Variable	%	%	
Fixed	%	%	
Total (should sum to 100.0%)	0.0 %	0.0 %	

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

	Years		
Item	2021	2022	2023
Depreciation expense (in \$1,000)			

<u>Depreciation expense classification</u> .—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.			
Financial data checklist.—			
Confirm the following with regard to the financial data reported in question III-9a:	√ if Yes		
In kilowatts?			
In \$1,000 dollars (not actual dollars)?			
Allocate all financial data to sold CSPV modules, as appropriate?			
Net sales values <u>exclude</u> freight costs associated with delivering the product to your customer(s), i.e., reflect f.o.b. values from your point of shipment?			
Net sales values exclude all discounts, returns, allowances, and prepaid freight.			
Cost items (e.g., materials, labor, other factory costs, and/or SG&A) exclude freight			
	(e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense rabove. Financial data checklist.— Confirm the following with regard to the financial data reported in question III-9a: In kilowatts? In \$1,000 dollars (not actual dollars)? Allocate all financial data to sold CSPV modules, as appropriate? Net sales values exclude freight costs associated with delivering the product to your customer(s), i.e., reflect f.o.b. values from your point of shipment? Net sales values exclude all discounts, returns, allowances, and prepaid freight.		

provide an explanation:

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

		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).
Yes	No	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.

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

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

	Years		
Item	2021	2022	2023
		Value (<i>\$1,000</i>)	
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 CSPV modules financial results.—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

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

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

III-11a. <u>CSPV Modules: Data consistency and reconciliation.</u>—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.

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

Is the financial data in question III-9a reported on a calendar-year basis?			
Yes—Complete question III-14b. No— Continue to question III-15.			
b. <u>Data consistency and reconciliation (calendar-year based financial data)</u> .—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) <u>for all periods</u> ?			
Yes	No	If no, please explain.	

Questions III-12a to III-17 ask that you provide data and/or narrative responses separately for cells and modules.

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

Note: Total assets should reflect the <u>net amount of assets</u> (i.e., after any accumulated depreciation and allowances deducted) and should be <u>allocated to CSPV cells and/or modules</u> if these assets are also related to other products. DO NOT INCLUDE LIABILITES.

Value (<i>in \$1,000</i>)			
	Years		
ltem	2021	2022	2023
CSPV cells:			
Total assets (net)			
CSPV modules:			
Total assets (net)			

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

CSPV cells:	
CSPV modules:	

III-13a. <u>Capital expenditures and research and development ("R&D") expenses</u>.—Report your firm's capital expenditures and research and development expenses for CSPV cells and/or modules.

Value (<i>in \$1,000</i>)						
	Years					
ltem	2021	2022	2023			
CSPV cells: Capital expenditures						
R&D expenses						
CSPV modules: Capital expenditures						
R&D expenses						

	N&D expenses						
	CSPV modules: Capital expenditures						
	R&D expenses						
III-13b.	<u>Description of reported capital expenditures</u> .—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.						
	CSPV cells:						
	CSPV modules:						
III-13c.	<u>Description of reported R&D expenses</u> .—your firm's reported R&D expenses.	-Please describe th	e nature, focus, an	d significance of			
	CSPV cells:						
	CSPV modules:						

Other

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please

n	<u>Effects of imports on investment</u> .—Since January 1, 2021, has your firm experienced any actunegative effects on its return on investment or the scale of capital investments as a result of imports of CSPV cells and/or modules from Cambodia, Malaysia, Thailand, and/or Vietnam?						
	No	Yes					
			If yes, my firm has expe	erienced actual negative effects as follows:			
(a	a) CSP\	/ cells:					
	(ch	eck as mo	any as appropriate)	(please describe the effects on CSPV cells)			
			ition, postponement, or n of expansion projects				
	Denial or rejection of investment proposal						
		Reduction	on in the size of capital ents				
			on specific investments ely impacted				
		Other					
(1	b) CSP\	/ module	s:				
	(ch	eck as mo	any as appropriate)	(please describe the effects on CSPV modules			
			ition, postponement, or n of expansion projects				
Denial or rejection of investment proposal			-				
		Reduction	on in the size of capital ents				
			on specific investments ely impacted				
-							

develop	ment and of the pro	production efforts (inclu	its growth, ability to raise capital, or existing ding efforts to develop a derivative or more advats of CSPV cells and/or modules from Cambodia,
No	Yes		
		If yes, my firm has expe	rienced actual negative effects as follows:
(a) CSP	/ cells:		
(ch	eck as mo	any as appropriate)	(please describe the effects on CSPV cells)
	Rejectio	n of bank loans	
	Lowerin	g of credit rating	
	Problem stocks o	related to the issue of r bonds	
	Ability to	o service debt	
	Other		
(b) CSP	/ module:	s:	
(ch	eck as mo	any as appropriate)	(please describe the effects on CSPV module
	Rejectio	n of bank loans	
	Lowerin	g of credit rating	
	Problem stocks o	related to the issue of r bonds	
	Ability to	o service debt	
	Other		

U.S. Producers' Questionnaire – CSPV Cells and Modules (Preliminary)
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III-17.	Anticipated effects of imports.—Does your firm anticipate any negative effects due to imports of CSPV cells and/or modules from Cambodia, Malaysia, Thailand, and/or Vietnam?						
	No	Yes	If yes, my firm anticipates negative effects as follows:				
			CSPV cells:				
			CSPV modules:				
III-18.	II-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 financi performance of your firm's operations on CSPV modules as reported in question III-9a? In y response, please include the duration and timing of any impacts as they relate to your firm financial performance.						
	No	Yes	If yes, please describe these effects on CSPV modules.				
III-19.	—If your firm would like to further explain a response to a question in Part ive box was not provided, please note the question number and the pace provided below. Please also use this space to highlight any issues your g the data in this section.						

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Pamela Davis (202-205-2218, Pamela.Davis@usitc.gov).

IV-1. <u>Contact information</u>.--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.
 - <u>Product 1.--</u> Monocrystalline silicon module with front-side area of less than 2.2 square meters and a peak power wattage between 380w and 450w, inclusive, P-max or Wp as measured under Standard Test Conditions (STC), excluding bifacial modules.
 - <u>Product 2</u>.-- Monocrystalline silicon module with front-side area of greater than or equal to 2.2 square meters and a peak power wattage between 320w and 440w, inclusive, P-max or Wp as measured under STC, excluding bifacial modules.
 - <u>Product 3.--</u> Monocrystalline silicon bifacial module that generates power on both sides of the panel with a front-side area of greater than or equal to 1.9 square meters and a peak power wattage between 320w and 450w, inclusive, P-max or Wp as measured under STC.
 - <u>Product 4.--</u> Monocrystalline silicon bifacial module that generates power on both sides of the panel with front-side area of greater than or equal to 1.9 square meters and a peak power wattage greater than or equal to 485w, inclusive, P-max or Wp as measured under STC.
 - Please note that values should be <u>f.o.b., U.S. point of shipment</u> 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).

Product 1: Product 2:

cist i reducers Questioninaire CS		(, ,		1 486 12
IV-2a. During January 2021-Decemb any of the above listed produ	· ·	•		
YesPlease complet	e the following pr	icing data tables,	as appropriate.	
NoSkip to question	ı IV-3.			
IV-2b. Price data: CSPV modules produced and sold by your f	•		, -,	oducts ²
(Ou	antity in kilowatt	s value in dollar	s)	
(40	Produ		Produ	uct 2
Period of shipment	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				
 Net values (i.e., gross sales values less f.o.b. your firm's U.S. point of shipment sale occurred. Pricing product definitions are provide 	. Please subtract any d	iscounts, rebates, ar		
Note. —If your firm's product does not exactly provide a description of your firm's product.				

IV-2b. Price data: CSPV modules.—Continued

Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

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

(1	Quantity in kilowatts	s, value in dolla	rs)		
	Produ	ıct 3	Product 4		
Period of shipment	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.

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 3:

Product 4:

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

IV-2c. <u>Price data checklist.</u>--Please check that the pricing data in question IV-2(b) have been correctly reported.

√ if Yes
transportation
d from the quarter in
nternal consumption,
part II for commercial
e kinds of documents/records

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.

If any of your responses differ between cells and modules, please indicate such differences in the most relevant narrative form field within that question. If you are unable to clarify any difference in a narrative form field within that question, please report the differences in question III-27.

IV-3. <u>Price setting.--</u>How does your firm determine the prices that it charges for sales of CSPV cells and modules (*check all that apply*)?

Transaction by transaction	Contracts	Set price lists	Other	If other, describe

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

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

Delivered	F.o.b.	If f.o.b., specify point

IV-6. <u>Contract versus spot.</u>--Approximately what shares of your firm's sales of its U.S.-produced CSPV cells and modules in 2023 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

	Type of sale					
ltem	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)	Total (shoul sum to 100.0%	d o
Share of 2023 sales	%	%	%	%	0.0	%

IV-7. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced CSPV cells and modules (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	ltem	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	Yes						
(during contract period)	No						
	Quantity						
Fixed quantity and/or price	Price						
aa, a paa	Both						
Indexed to raw	Yes						
material costs ¹	No						
Not applicab	le						
¹ Please identify the indexes used:							

IV-8. <u>Lead times.</u>--What share of your firm's sales of its U.S.-produced CSPV cells and modules were from inventory and produced to order, and what was the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced CSPV cells and modules?

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 CSPV cells and modules 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. <u>Geographical shipments.</u>—In which U.S. geographic market area(s) has your firm sold its U.S.-produced CSPV cells and modules since January 1, 2021 (check all that apply)?

Geographic area	√ if applicable
NortheastCT, ME, MA, NH, NJ, NY, PA, RI, and VT.	
MidwestIL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	
Southeast.—AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	
Central Southwest.—AR, LA, OK, and TX.	
Mountains.–AZ, CO, ID, MT, NV, NM, UT, and WY.	
Pacific Coast.–CA, OR, and WA.	
Other .—All other markets in the United States not previously listed, including AK, HI, PR, and VI.	

IV-11.	<u>Inland transportation costs.</u> —What is the approximate percentage of the cost of U.S.	produced
	CSPV cells and modules that is accounted for by U.S. inland transportation costs?	percen ⁻

IV-12. <u>End uses.</u>--List the end uses of the CSPV cells and modules that your firm manufactures. For each end-use product, what percentage of the <u>total production cost</u> is accounted for by CSPV cells and modules and other inputs (such as labor, energy, and other raw materials)?

	Share of total cost of accounte	Total							
End-use product	CSPV cells/ modules	CSPV cells/ modules Other inputs							
CSPV Cells									
Modules	%	%	0.0 %						
Other end uses ¹									
¹ Identify the end use p	roduct(s):								
	CSPV Mod	ules							
Residential system	%	%	0.0 %						
Commercial system	%	%	0.0 %						
Utility system	%	%	0.0 %						
Other end uses ²	ther end uses ² % %								
² Identify the end use p	roduct(s):		² Identify the end use product(s):						

² Identify the end use product(s):									
IV-	13. <u>Substitutes</u> Can other products be substituted for CSPV cells and modules?								
	☐ No	YesPlease fill out t	he tal	ole.					
		End use in which this			nanges in the price of this substitut the price for CSPV cells and modul				
	Substitute	substitute is used	No	Yes	Explanation				
1.									
2.									
3.									

U.S. Pro	ducers' Qu	uestio	nnaire –	CSPV Cells a	and Modu	ıles (Prelim	inary)	Page 49
IV-14.	known) fo changed, t trends and	r CSP fluctu d desc	V cells an lated but cribe the	d modules s ended lowe	steadily in r, or stea	ncreased, fl dily decrea	uctuated bu sed since Ja	e of the United States (if ut ended higher, not nuary 1, 2021? Explain any nanges in demand.
	Select one			Ι	I			
	Marke		Steadily increase	-	No change	Fluctuate down	Steadily decrease	Explanation and factors
	Within t United States	ı						
	Outside t United States	ı						
IV-15.	<u>Product changes.</u> Have there been any significant changes in the product range, product mix, or marketing of CSPV cells and modules since January 1, 2021?							
	No	Ye	es If yo	es, please d	escribe a	nd quantify	if possible	•
IV-16.			='	e CSPV cells s years? If ye			et subject to	business cycles, either
	No	Ye	es If yo	yes, please describe, including any changes since January 1, 2021.				
	competition	on dis	stinctive t		and mod			et subject to conditions of usiness cycles described in
	No	Ye	es If yo	es, please d	escribe, i	ncluding ar	y changes s	since January 1, 2021.
		Г	7					

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11'	S Producers	THESTIONNAIRE -	. C NPV C PIIS ANN	IVINALIIES	i Preliminarvi

U.S. PI	Juucers Qi	uestionnai	re – CSPV Cells and Modules (Preliminary)			
IV-18.	<u>Government incentives.</u> Have there been any changes in the level or availability of government incentives for CSPV products since January 1, 2021? If yes, please list or describe the principal incentive programs (e.g., Solar Investment Tax Credit, Section 1603 Program, Renewable Portfolio Standards, Solar Energy Manufacturing for America Act, Inflation Reduction Act, and/or California Solar Initiative), whose change has affected the CSPV market.					
	No	Yes	If yes, please describe, including any changes since January 1, 2021.			
IV-19.	generated electricity	l from U.S. since Janu	y sourcesHave there been any changes in the price of electricity conventional energy sources that affected the price of solar-generated pary 1, 2021? If so, please explain any trends and describe the principal these changes in price.			
	No	Yes	If yes, please explain any trends and describe, including any changes since January 1, 2021.			
IV-20.	20. <u>Supply constraints.</u> —Has your firm refused, declined, or been unable to supply CSPV cells a modules 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 shipmed 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.			
IV-21.			ve CSPV cells and modules raw material prices steadily increased, fluctuated ot changed, fluctuated but ended lower, or steadily decreased since January			

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 CSPV cells and modules.

IV-22. <u>Interchangeability</u>.—How often are CSPV cells and modules 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	Cambodia	Malaysia	Thailand	Vietnam	Other countries
United States					
Cambodia					
Malaysia		$\backslash\!$			
Thailand					
Vietnam					

For any country-pair producing CSPV cells and modules that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of CSPV cells and modules produced in the countries:

U.S. Producers	' Questionnaire -	CSPV Cells and	Modules	(Preliminary)
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IV-23. <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 CSPV cells and modules 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 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	Cambodia	Malaysia	Thailand	Vietnam	Other countries
United States					
Cambodia					
Malaysia					
Thailand					
Vietnam				><	
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 CSPV cells and modules, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:					

IV-24. Role of tariffs, quotas, safeguards, and/or measures.-- Did any tariffs, safeguards, quotas, or measures (e.g., tariffs on Chinese-origin products under section 301, measures on imported steel/aluminum products under section 232, or safeguard measures under section 201), or changes in these tariffs, quotas, or measures (such as the level, coverage, or nature), have an impact on the CSPV cells and modules market in the United States, including any effects on CSPV cells and modules cost, price, supply, and/or demand, since January 1, 2021?

Yes	No	Don't know

If yes, please identify the tariff, quota, and or measure, separately describe the impact of each on cost, price, supply, and/or demand, and include the timing of such impacts.

IV-25. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for CSPV cells and modules since January 1, 2021. Indicate the share of the quantity of your firm's U.S. shipments of CSPV cells and modules that each of these customers accounted for in 2023.

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

U.S. Producers	s' Questionnaire -	 CSPV Cells and 	Modules	(Preliminary)
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IV-26.	Com	petition	from	im	ports

(a)	<u>Lost revenue</u> Since January 1, 2021: To avoid losing sales to competitors selling CSPV
	cells and modules from Cambodia, Malaysia, Thailand, and/or Vietnam, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales.</u>--Since January 1, 2021: Did your firm lose sales of CSPV cells and modules to imports of this product from Cambodia, Malaysia, Thailand, and/or Vietnam?

No	Yes

(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?

No—Please explain.
Yes—Please complete the worksheet and submit via the Commission dropbox. https://dropbox.usitc.gov/oinv/ . (PIN: CSPV)

IV-27.	Other explanationsIf 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.

PART V.—MATERIAL RETARDATION AND SEMI-FINISHED PRODUCT ANALYSIS

Further information on this part of the questionnaire can be obtained from Julie Duffy (202-708-2579,
julie.duffy@usitc.gov). Supply all data requested on a calendar-year basis.

		volumes (in kilowatts):
	-	duction commencement.—Please indicate whether your firm has comm luction of CSPV cells since January 1, 2021.
No	Yes	If yes, specify the date commenced (month, day, year) and the produvolumes (in kilowatts):
	_	If yes, specify (1) the date (month, day, year) of non-production and (
	_	e production at any time after January 1, 2021?
No Did your	Yes	If yes, specify (1) the date (month, day, year) of non-production and date (month, day, year) of recommencement: oduce CSPV cells prior to January 1, 2021? other products at its facility prior to January 1, 2021?
No Did your	Yes	If yes, specify (1) the date (month, day, year) of non-production and date (month, day, year) of recommencement: oduce CSPV cells prior to January 1, 2021? other products at its facility procells?
No Did your	Yes	If yes, specify (1) the date (month, day, year) of non-production and date (month, day, year) of recommencement: oduce CSPV cells prior to January 1, 2021? other products at its facility prior to January 1, 2021?

V-6.	Business plans Please indicate whether the following were prepared and/or commissioned by
	your firm: Studies, business plans, cost or sales projections, engineering test results, or
	correspondence concerning the feasibility, cost, and/or desirability of manufacturing CSPV cells

No	Yes	
		If yes, please be prepared to make such documents available to the Commission upon request.

V-7. <u>Projected production of CSPV cells.</u>—Please report your firm's projected capacity and production of CSPV cells in 2024 and 2025.

"Practical 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.

"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.

Quantity (in kilowatts)					
	Calend	ar year			
Item	2024	2025			
Practical production capacity of CSPV cells					
Trial production of CSPV cells					
Commercial production of CSPV cells					
Total production of CSPV cells					

"Unfinished product(s)" – CSPV cells. "Finished product(s)" – CSPV modules. (i) Are there uses for the unfinished product(s) other than for the production of the finished product(s) No Yes If yes—Please describe these uses. (ii) Is the market for unfinished product(s) separate and distinct from the market for finished product(s)? No Yes If yes—Please describe how they are separate and distinct. (iii) Are there differences in the physical characteristics and functions of the unfinished product(s) and finished product(s)? No Yes If yes—Please describe these differences. (iv) Is there a significant difference in the cost or value between unfinished product(s) and finished product(s)? No Yes If yes—Please describe these differences. (iv) Would you describe the processes used to transform the unfinished product(s) into the finished product(s) as significant and particularly labor or capital intensive? No Yes If yes—Please describe the labor or capital intensively of the conversion process.	differen	<u>-finished product analysis</u> Please answer the following questions regarding the rences and similarities in unfinished product(s) and finished product(s) in this proceeding as ed below:		
finished product(s) No Yes If yesPlease describe these uses.	-	•	• •	
(ii) Is the market for unfinished product(s) separate and distinct from the market for finished product(s)? No	. ,		, , , , , , , , , , , , , , , , , , , ,	
finished product(s)? No Yes If yesPlease describe how they are separate and distinct.	No	Yes	If yesPlease describe these uses.	
finished product(s)? No Yes If yesPlease describe how they are separate and distinct.				
(iii) Are there differences in the physical characteristics and functions of the unfinished product(s) and finished products(s)? No			· · · · · · · · · · · · · · · · · · ·	
No Yes If yesPlease describe these differences.	No	Yes	If yesPlease describe how they are separate and distinct.	
No Yes If yesPlease describe these differences.				
(iv) Is there a significant difference in the cost or value between unfinished product(s) and finished product(s)? No Yes If yesPlease describe these differences. (v) Would you describe the processes used to transform the unfinished product(s) into the finished product(s) as significant and particularly labor or capital intensive? If yesPlease describe the labor or capital intensively of the conversion			·	
No Yes If yesPlease describe these differences. (v) Would you describe the processes used to transform the unfinished product(s) into the finished product(s) as significant and particularly labor or capital intensive? If yesPlease describe the labor or capital intensively of the conversion	No	Yes	If yesPlease describe these differences.	
No Yes If yesPlease describe these differences. (v) Would you describe the processes used to transform the unfinished product(s) into the finished product(s) as significant and particularly labor or capital intensive? If yesPlease describe the labor or capital intensively of the conversion				
(v) Would you describe the processes used to transform the unfinished product(s) into the finished product(s) as significant and particularly labor or capital intensive? If yesPlease describe the labor or capital intensively of the conversion	• •		· · · · · · · · · · · · · · · · · · ·	
finished product(s) as significant and particularly labor or capital intensive? If yesPlease describe the labor or capital intensively of the conversion	No	Yes	If yesPlease describe these differences.	
finished product(s) as significant and particularly labor or capital intensive? If yesPlease describe the labor or capital intensively of the conversion				
		•	· · · · · · · · · · · · · · · · · · ·	
	No	Yes		

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.

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 of further instructions.

• <u>Upload via Commission's secure submission portal</u>.— 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.).

• E-mail.— E-mail the MS Word questionnaire to julie.duffy@usitc.gov; include a PDF copy of the complete questionnaire with a signature on the first page. 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 submission portal 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 PDF copy via the Commission's secure submission portal or email.

<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.