

LOST SALES AND LOST REVENUE SURVEY

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

This survey 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 survey is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning 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 survey is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)). Further information on this survey can be obtained from Pamela Davis (202-205-2218, Pamela.Davis@usitc.gov).

Name of firm _____

Address _____

City _____ State _____ Zip Code _____

Website _____

Has your firm purchased CSPV cells and modules (as defined on next page) at any time since January 1, 2021?

☐ **NO** (Sign the certification below and promptly return **only** this page of the survey to the Commission)

☐ **YES** (Complete all parts of the survey, and return the entire survey to the Commission)

Return questionnaire via the U.S. International Trade Commission **Drop Box** by clicking on the following link: <https://usitc.gov/qportal>. (PIN: **CSPV**). See last page for detailed instructions.

CERTIFICATION

I certify that the information herein supplied in this survey 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 submitting this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this survey 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 investigation or other proceeding 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

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://ids.usitc.gov/case/8195/investigation/8558>

CSPV cells and modules 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.

CSPV cell.--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.

CSPV module.--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 "**laminated**" is a module that does not have a frame.

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.

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.

Contact information.--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this survey. This may or may not be the person whose signature is at the bottom of page 1.

Name	
Title	
Email	
Telephone	

Firms operating more than one establishment should combine the data for all establishments into a single response.

PURCHASE INFORMATION

1. **Firm type.**-- Which of the following describes your firm as a purchaser of CSPV products?
Check all that apply.

Firm type	
Residential installer	<input type="checkbox"/>
Commercial installer	<input type="checkbox"/>
Utility company/developer	<input type="checkbox"/>
Distributor of cells	<input type="checkbox"/>
Distributor of modules	<input type="checkbox"/>
Module assembler	<input type="checkbox"/>
Distributor of off-grid portable consumer goods	<input type="checkbox"/>
Other (please provide a description)	<input type="checkbox"/>
If "Other", please provide a description:	

2. **Purchases and imports**-- Report your firm's domestic purchases and imports. Report based on delivery date, not order date.

"Purchase" – Purchase (either directly or through a sales agent or broker) from a U.S. entity such as a U.S. producer, a U.S. importer, or other U.S. firm.

"Import" – Purchase directly from a foreign supplier and your firm is the importer of record.

CSPV cell import data reported should relate to cells manufactured in Cambodia, Malaysia, Thailand, Vietnam and/or all other sources. **Do not include** cells manufactured in countries other than Cambodia, Malaysia, Thailand, Vietnam, and/or all other sources that were re-exported.

CSPV cell purchase data reported should relate to purchased cells manufactured in Cambodia, Malaysia, Thailand, Vietnam and/or all other sources. **Do not include** purchases of cells manufactured in countries other than Cambodia, Malaysia, Thailand, Vietnam, and/or all other sources that were re-exported.

CSPV module purchase data reported should relate to modules made from CSPV cells originating in Cambodia, Malaysia, Thailand, Vietnam and/or all other sources regardless of the country of module assembly or country of exportation. Modules assembled with CSPV cells originating in countries other than Cambodia, Malaysia, Thailand, and Vietnam should be reported as CSPV modules from "all other sources."

In addition, the following imports should be reported as imports of CSPV cells and modules from "all other sources":

- (1) CSPV cells meeting the scope description (see pages 2-3) that were produced in Cambodia, Malaysia, Thailand, and/or Vietnam from wafers produced in China should be reported as imports of CSPV cells from "all other sources."
- (2) CSPV modules consisting of CSPV cells that were produced in Cambodia, Malaysia, Thailand, and/or Vietnam from wafers produced in China and where more than two of the following components in the module were produced in China: (1) silver paste; (2) aluminum frames; (3) glass; (4) backsheets; (5) ethylene vinyl acetate sheets; and/or (6) junction boxes.

In addition, the following purchases should be reported as purchases of CSPV cells and modules from "all other sources":

- (3) CSPV cells meeting the scope description (see pages 2-3) that were produced in Cambodia, Malaysia, Thailand, and/or Vietnam from wafers produced in China should be reported as purchases of CSPV cells from "all other sources."
- (4) CSPV modules consisting of CSPV cells that were produced in Cambodia, Malaysia, Thailand, and/or Vietnam from wafers produced in China and where more than two of the following components in the module were produced in China: (1) silver paste; (2) aluminum frames; (3) glass; (4) backsheets; (5) ethylene vinyl acetate sheets; and/or (6) junction boxes.

2. Purchases and imports (continued).—

Item	2021	2022	2023
	Quantity (in kilowatts)		
Purchases of CSPV cells and modules produced in—			
United States			
Cambodia			
Malaysia			
Thailand			
Vietnam			
All other countries ¹			
Sources unknown ²			
Total purchases	0	0	0
Imports of CSPV cells and modules from—			
Cambodia			
Malaysia			
Thailand			
Vietnam			
All other countries ¹			
Total imports ³	0	0	0
¹ Please identify these countries: ² Please indicate the firm(s) from which you purchased this merchandise: ³ If your firm imported CSPV cells and modules at any time since January 1, 2021, please also complete and return a U.S. importers' questionnaire in this proceeding.			

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 6.

3. **Changes in purchasing patterns.**— Please indicate whether the shares of your firm’s purchases of CSPV cells and modules steadily increased, fluctuated but ended higher, were constant, fluctuated but ended lower, or steadily decreased since January 1, 2021 from the listed sources.

Select one box per row.

[illegible]

4. Purchasing subject imports rather than domestic product (CSPV cells).—

- (a) Since January 1, 2021, did your firm import and/or purchase imports of **CSPV cells** from Cambodia, Malaysia, Thailand, and Vietnam instead of purchasing U.S.-produced **CSPV cells**? Respond for each subject country.

Source	Yes (also respond to parts (b) and (c))	No (If “No” for all countries, skip to next question)
Cambodia	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If you responded “Yes” to part (a), was the imported product priced lower than the domestic product?

Source	Yes	No
Cambodia	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam	<input type="checkbox"/>	<input type="checkbox"/>

- (c) If you responded “Yes” to part (a), was price a primary reason for importing and/or purchasing subject imports rather than domestic product?

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2021 (in kilowatts)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
Cambodia	<input type="checkbox"/>		<input type="checkbox"/>	
Malaysia	<input type="checkbox"/>		<input type="checkbox"/>	
Thailand	<input type="checkbox"/>		<input type="checkbox"/>	
Vietnam	<input type="checkbox"/>		<input type="checkbox"/>	
If the quantity reported above exceeds the total quantity reported in question 2, please explain.				

5. **Purchasing subject imports rather than domestic product (CSPV modules).—**

- (a) Since January 1, 2021, did your firm import and/or purchase imports of **CSPV modules** from Cambodia, Malaysia, Thailand, and Vietnam instead of purchasing U.S.-produced **CSPV modules**? Respond for each subject country.

Source	Yes (also respond to parts (b) and (c))	No (If “No” for all countries, skip to next question)
Cambodia	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If you responded “Yes” to part (a), was the imported product priced lower than the domestic product?

Source	Yes	No
Cambodia	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam	<input type="checkbox"/>	<input type="checkbox"/>

- (c) If you responded “Yes” to part (a), was price a primary reason for importing and/or purchasing subject imports rather than domestic product?

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2021 (in kilowatts)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
Cambodia	<input type="checkbox"/>		<input type="checkbox"/>	
Malaysia	<input type="checkbox"/>		<input type="checkbox"/>	
Thailand	<input type="checkbox"/>		<input type="checkbox"/>	
Vietnam	<input type="checkbox"/>		<input type="checkbox"/>	
If the quantity reported above exceeds the total quantity reported in question 2, please explain.				

6. U.S. producers and import competition.—

- (a) Since January 1, 2021, in connection with a sale or offer to sell CSPV cells and modules to your firm, did U.S. producers reduce their prices of domestically produced CSPV cells and modules in order to compete with lower-priced imports of CSPV cells and modules from the subject countries? Respond for each subject country.

Source	Yes (also respond to question part (b))	No (If “No” for all countries, skip to next question)	Don’t know
Cambodia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Malaysia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vietnam	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If your firm responded “yes” to any of the above countries, please provide an estimate of the reduction in U.S. producers’ prices and any additional explanations.

Source	Estimated reduction in U.S. prices (percent)	Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors
Cambodia	%	
Malaysia	%	
Thailand	%	
Vietnam	%	

- 7. Major purchasing factors.—**Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase CSPV cells and modules.

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

8. **Other explanations**--Please provide any additional comments in this box.

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9. **Stock symbol information**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

10. **External counsel**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, having filed an entry of appearance, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

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

Hours	Dollars

Public reporting burden for this survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

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.

HOW TO FILE YOUR SURVEY RESPONSE

Please do not attempt to modify the format or permissions of the survey document.

Please submit the completed survey using one of the methods noted below. If your firm is unable to complete the MS Word survey or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

- **Upload via Secure Drop Box.**— 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: CSPV

- **E-mail.**— E-mail the MS Word questionnaire to Pamela.Davis@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 did not purchase this product, please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission's secure submission portal or email.