

## U.S. IMPORTERS' QUESTIONNAIRE

### BRAKE DRUMS FROM CHINA AND TURKEY

This questionnaire must be received by the Commission by **July 5, 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 antidumping and countervailing duty investigations concerning brake drums from China and Turkey (Inv. Nos. 701-TA-729-730 and 731-TA-1698-1699 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

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

Address \_\_\_\_\_

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

Website \_\_\_\_\_

Has your firm imported brake drums (as defined on next page) from any country at any time since January 1, 2021?

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

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

Return questionnaire via the Commission's secure portal by clicking on the following link:  
<https://usitc.gov/qportal>. (PIN: **BRAKE**). See last page for detailed instructions.

#### CERTIFICATION

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

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

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

**PART I.—GENERAL INFORMATION**

This proceeding was instituted in response to a petition filed on June 20, 2024, by Webb Wheel Products, Inc., Cullman, Alabama. Antidumping and/or countervailing 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 dumping and/or subsidization. Pertinent information to this proceeding is available at:

Questionnaires: [https://usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://usitc.gov/reports/active_import_injury_questionnaires)

Other case information: <https://ids.usitc.gov/case/8208/investigation/8587>

**Brake drums** covered by this proceeding are defined as follows:

The merchandise covered by these investigations is certain brake drums made of gray cast iron, whether finished or unfinished, with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, weighing more than 50 pounds. Unfinished brake drums are those which have undergone some turning or machining but are not ready for installation. Subject brake drums are included within the scope whether imported individually or with non-subject merchandise (for example, a hub), whether assembled or unassembled, or if joined with non-subject merchandise. When a subject drum is imported together with non-subject merchandise, such as, but not limited to, a drum-hub assembly, only the subject drum is covered by the scope.

Subject merchandise also includes finished and unfinished brake drums that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the subject brake drums. The inclusion, attachment, joining, or assembly of non-subject merchandise with subject drums either in the country of manufacture of the subject drum or in a third country does not remove the subject drum from the scope. The scope of these investigations does not include any products already covered by the antidumping and countervailing duty orders on certain chassis and subassemblies thereof from the People’s Republic of China (A-570-135; C-570-136).

The scope also excludes composite brake drums that contain more than 40 percent steel by weight, while certain brake drums that meet the above criteria and that contain 40 percent or less steel by weight are within the scope.

Brake drums are currently imported under statistical reporting number 8708.30.5020 of the Harmonized Tariff Schedule of the United States (“HTSUS”). They may also be imported under HTSUS statistical reporting number 8708.30.5090 when combined with a hub to form an assembly. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

**Importer**.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing brake drums (as defined above) into the United States from a foreign manufacturer or through its selling agent.

**Reporting of information**.--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

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

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

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

**Valid number error messages.**--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Mary Messer (202-205-3193, [mary.messer@usitc.gov](mailto:mary.messer@usitc.gov)).

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

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

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 40 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please provide such comments to the Office of Investigations, [import\\_injury@usitc.gov](mailto:import_injury@usitc.gov).

- I-2a. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire.

**"Establishment"**--Each facility of a firm involved in the importation of brake drums, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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

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

Firm name	Country	Extent of ownership (percent)

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

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

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-5. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of brake drums?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-6. **Importing operations.**--Please indicate the nature of your firm’s importing operations on brake drums. The importer of record is expected to complete this questionnaire; however, more than one answer may be applicable.

Importer of record	Takes title to the imported product(s)	Consignee of the imported products(s)	Customs broker or freight forwarder
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-7. **Consignee.**--If your firm is an importer of record of brake drums but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

- I-8. **FTZ or bonded warehouses.**--Please indicate whether your firm admits brake drums into, or withdraws such merchandise from, foreign trade zones or bonded warehouses.

**"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, as well as other savings. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

**"Bonded warehouse"** is a secured facility supervised by U.S. Customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designated as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

Item	No	Yes	Quantity (in units) admitted in 2023
Foreign trade zones	<input type="checkbox"/>	<input type="checkbox"/>	
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>	

- I-9. **Other trade actions.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

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

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

Further information on this part of the questionnaire can be obtained from Mary Messer (202-205-3193, [mary.messer@usitc.gov](mailto:mary.messer@usitc.gov)). **Supply all data requested on a calendar-year basis.**

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

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.**--Has your firm experienced any changes in ownership or in the nature of its importing operations for brake drums since January 1, 2021?

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

- 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, importation, employment, and shipments relating to brake drums? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations.

No	Yes	If yes, describe these changes including the impact over time on (a) the supply chain, (b) importation and shipments, and (c) employment with respect to brake drums.
<input type="checkbox"/>	<input type="checkbox"/>	



II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of brake drums for delivery after **March 31, 2024**?

**"Arranged imports"** are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

<b>No</b>	<b>Yes</b>	If yes, fill out the table below.
<input type="checkbox"/>	<input type="checkbox"/>	

Source	Period			
	Apr-Jun 2024	Jul-Sept 2024	Oct-Dec 2024	Jan-Mar 2025
	Quantity ( <i>in units</i> )			
China				
Turkey				
All other sources				

II-3b. **Imports in the 12-month period preceding the petitions.**--Has your firm imported brake drums from any source between June 1, 2023 and May 31, 2024? (i.e., the last 7 months in 2023 and first 5 months in 2024 combined)

<b>No</b>	<b>Yes</b>	If yes, report the quantity of such import below by source.
<input type="checkbox"/>	<input type="checkbox"/>	

Source	June 2023 through May 2024	
	Classified under Primary HTS number 8708.30.5020	Classified under Other HTS numbers <sup>1</sup>
	Quantity ( <i>in units</i> )	
China		
Turkey		
All other sources		
<sup>1</sup> List the specific "Other" HTS numbers your firm imported its brake drums under: .		

II-4. **Reasons for importing if producer.**--If your firm also produces brake drums in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

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**Definitions**

***"Imports"*** –Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty).

***"Import quantities"*** –Quantities reported should be net of returns.

***"Import values"*** –Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

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

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

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

***"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.

Report data for only the brake drums included in the scope (see definition on page 2). For in-scope brake drums attached to out-of-scope merchandise (e.g., drum-hub assemblies), report shipment quantities and values of the in-scope brake drum attached (i.e., not the value of the entire assembly).

*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-5a. **U.S. imports from China.**—Report your firm's imports and your firm's shipments and inventories of brake drums imported from China by your firm during the specified periods.

## China

Quantity (in units), value (in \$1,000)					
Item	Calendar year			January-March	
	2021	2022	2023	2023	2024
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Classified under Primary HTS number 8708.30.5020: Quantity (B)					
Value (C)					
Classified under Other HTS numbers: <sup>2</sup> Quantity (D)					
Value (E)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (F)					
Value (G)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (J)					
Value <sup>2</sup> (K)					
<b>Export shipments:</b> <sup>3</sup> Quantity (L)					
Value (M)					
<b>End-of-period inventories:</b> (quantity) (N)					
<sup>1</sup> Please identify the foreign producers, if known: _____. <sup>2</sup> List the specific "Other" HTS numbers: _____. <sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. <sup>4</sup> Identify your firm's principal export markets: _____.					

II-5a. **U.S. imports from China.--Continued**

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

Reconciliation	Calendar year			January-March	
	2021	2022	2023	2023	2024
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-5b. **Channels of distribution: China.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution during the specified periods.

**"OEM"** -- original equipment manufacturers that purchase brake drums as first-fit production parts to be installed on transportation vehicles (e.g., new trucks and trailers).

**"AFM"** -- aftermarket suppliers that purchase brake drums to supply replacement brake drums to dealers, end users, or independent warehouse distributors.

## China

Quantity (in units)					
Item	Calendar year			January-March	
	2021	2022	2023	2023	2024
<b>Channels of distribution:</b>					
<b>U.S. shipments to:</b>					
OEM truck (O)					
OEM trailer (P)					
AFM truck (Q)					
AFM trailer (R)					

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

Reconciliation item	Calendar year			January-March	
	2021	2022	2023	2023	2024
O + P + Q + R – F – H – J = zero ("0"), if not revise.	0	0	0	0	0

- II-5c. **U.S. shipments by weight category.**--Report the quantity of your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imported brake drums during calendar year 2023 by weight category.

Quantity ( <i>in units</i> )	
Item	Calendar year 2023
<b>U.S. shipments:</b>	
Greater than 50 pounds but less than 97 pounds (S)	
Greater than or equal to 97 pounds but less than or equal to 106 pounds (T)	
Greater than 106 pounds but less than or equal to 113 pounds (U)	
Greater than 113 pounds (V)	

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for U.S. shipments by weight category (i.e., lines S through V) in each time period equal the quantity reported for U.S. shipments (i.e., lines F, H, and J) in calendar year 2023. If the calculated fields below return quantities other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year 2023
$S + T + U + V - F - H - J = \text{zero ("0")}$ , if not revise.	0

II-6a. **U.S. imports from Turkey.**—Report your firm's imports and your firm's shipments and inventories of brake drums imported from Turkey by your firm during the specified periods.

## Turkey

Quantity (in units), value (in \$1,000)					
Item	Calendar year			January-March	
	2021	2022	2023	2023	2024
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Classified under Primary HTS number 8708.30.5020: Quantity (B)					
Value (C)					
Classified under Other HTS numbers: <sup>2</sup> Quantity (D)					
Value (E)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (F)					
Value (G)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (J)					
Value <sup>2</sup> (K)					
<b>Export shipments:</b> <sup>3</sup> Quantity (L)					
Value (M)					
<b>End-of-period inventories:</b> (quantity) (N)					
<sup>1</sup> Please identify the foreign producers, if known: _____. <sup>2</sup> List the specific "Other" HTS numbers: _____. <sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. <sup>4</sup> Identify your firm's principal export markets: _____.					

II-6a. **U.S. imports from Turkey.--Continued**

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

Reconciliation	Calendar year			January-March	
	2021	2022	2023	2023	2024
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-6b. **Channels of distribution: Turkey.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from Turkey by channel of distribution during the specified periods.

**"OEM"** -- original equipment manufacturers that purchase brake drums as first-fit production parts to be installed on transportation vehicles (e.g., new trucks and trailers).

**"AFM"** -- aftermarket suppliers that purchase brake drums to supply replacement brake drums to dealers, end users, or independent warehouse distributors.

## Turkey

Quantity (in units)					
Item	Calendar year			January-March	
	2021	2022	2023	2023	2024
<b>Channels of distribution:</b>					
<b>U.S. shipments to:</b>					
OEM truck (O)					
OEM trailer (P)					
AFM truck (Q)					
AFM trailer (R)					

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

Reconciliation item	Calendar year			January-March	
	2021	2022	2023	2023	2024
O + P + Q + R – F – H – J = zero ("0"), if not revise.	0	0	0	0	0

- II-6c. **U.S. shipments by weight category.**--Report the quantity of your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imported brake drums during calendar year 2023 by weight category.

Quantity (in units)	
Item	Calendar year 2023
<b>U.S. shipments:</b>	
Greater than 50 pounds but less than 97 pounds (S)	
Greater than or equal to 97 pounds but less than or equal to 106 pounds (T)	
Greater than 106 pounds but less than or equal to 113 pounds (U)	
Greater than 113 pounds (V)	

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for U.S. shipments by weight category (i.e., lines S through V) in each time period equal the quantity reported for U.S. shipments (i.e., lines F, H, and J) in calendar year 2023. If the calculated fields below return quantities other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year 2023
$S + T + U + V - F - H - J = \text{zero ("0")}$ , if not revise.	0



- II-7a. **Imports from all other sources.**—Report your firm's imports and your firm's shipments and inventories of brake drums imported from **all other sources** by your firm during the specified periods.

## All other sources

(list sources: \_\_\_\_\_)

Quantity (in units), value (in \$1,000)					
Item	Calendar year			January-March	
	2021	2022	2023	2023	2024
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports:</b> <sup>1</sup> Classified under Primary HTS number 8708.30.5020: Quantity (B)					
Value (C)					
Classified under Other HTS numbers: <sup>2</sup> Quantity (D)					
Value (E)					
<b>U.S. shipments:</b> <b>Commercial shipments:</b> Quantity (F)					
Value (G)					
<b>Internal consumption:</b> <sup>2</sup> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Transfers to related firms:</b> <sup>2</sup> Quantity (J)					
Value <sup>2</sup> (K)					
<b>Export shipments:</b> <sup>3</sup> Quantity (L)					
Value (M)					
<b>End-of-period inventories:</b> (quantity) (N)					
<sup>1</sup> Please identify the foreign producers, if known: _____. <sup>2</sup> List the specific "Other" HTS numbers: _____. <sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. <sup>4</sup> Identify your firm's principal export markets: _____.					

II-7a. **Imports from all other sources.**—Continued

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

Reconciliation	Calendar year			January-March	
	2021	2022	2023	2023	2024
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-7b. **Channels of distribution: All other sources.**— Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from **all other sources** by channel of distribution during the specified periods.

**"OEM"** -- original equipment manufacturers that purchase brake drums as first-fit production parts to be installed on transportation vehicles (e.g., new trucks and trailers).

**"AFM"** -- aftermarket suppliers that purchase brake drums to supply replacement brake drums to dealers, end users, or independent warehouse distributors.

## All other sources

Quantity (in units)					
Item	Calendar year			January-March	
	2021	2022	2023	2023	2024
<b>Channels of distribution:</b>					
<b>U.S. shipments to:</b>					
OEM truck (O)					
OEM trailer (P)					
AFM truck (Q)					
AFM trailer (R)					

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

Reconciliation item	Calendar year			January-March	
	2021	2022	2023	2023	2024
O + P + Q + R – F – H – J = zero ("0"), if not revise.	0	0	0	0	0

- II-7c. **U.S. shipments by weight category.**--Report the quantity of your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imported brake drums during calendar year 2023 by weight category.

Quantity (in units)	
Item	Calendar year 2023
<b>U.S. shipments:</b>	
Greater than 50 pounds but less than 97 pounds (S)	
Greater than or equal to 97 pounds but less than or equal to 106 pounds (T)	
Greater than 106 pounds but less than or equal to 113 pounds (U)	
Greater than 113 pounds (V)	

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for U.S. shipments by weight category (i.e., lines S through V) in each time period equal the quantity reported for U.S. shipments (i.e., lines F, H, and J) in calendar year 2023. If the calculated fields below return quantities other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year 2023
$S + T + U + V - F - H - J = \text{zero ("0")}$ , if not revise.	0

- II-8a. **Out-of-scope merchandise imported under the primary HTS number 8708.30.5020.**-- Report your firm's quantity and value of U.S. imports of products other than in-scope brake drums (i.e., out-of-scope merchandise) imported and classified under the primary HTS number for brake drums (8708.30.5020) in the specified periods.

Quantity (in units), value (in \$1,000)					
Source	Calendar year			January-March	
	2021	2022	2023	2023	2024
<b>U.S. imports other than in-scope brake drums (i.e., out-of-scope products)<sup>1</sup> imported under primary HTS number 8708.30.5020 from:</b>					
China:					
Quantity					
Value					
Turkey:					
Quantity					
Value					
All other sources: <sup>2</sup>					
Quantity					
Value					

<sup>1</sup> Please identify the specific out-of-scope products your firm imports under the primary HTS number for in-scope brake drums in order of commercial importance (volume): \_\_\_\_\_.

<sup>2</sup> Please identify the specific sources: \_\_\_\_\_.

- II-8b. **Out-of-scope merchandise imported under the primary HTS number 8708.30.5020.**-- Report your firm's quantity of U.S. imports of products other than in-scope brake drums (i.e., out-of-scope merchandise) imported and classified under the primary HTS number for brake drums (8708.30.5020) in the specified period.

Source	June 2023 through May 2024
	Quantity (in units)
<b>U.S. imports other than in-scope brake drums (i.e., out-of-scope products)<sup>1</sup> imported under primary HTS number 8708.30.5020 from:</b>	
China	
Turkey	
All other sources <sup>2</sup>	

<sup>1</sup> Please identify the specific out-of-scope products your firm imports under the primary HTS number for in-scope brake drums in order of commercial importance (volume): \_\_\_\_\_.

<sup>2</sup> Please identify the specific sources: \_\_\_\_\_.

- II-8. **Transfers to related firms.**--If your firm reported transfers to related firms in any of the data tables in part II, 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) and whether the transfers were priced at market value or by a non-market formula.

--

- II-9. **Other explanations.**--If your firm would like to further explain a response to a question in Part II 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 III.--PRICING AND MARKET FACTORS**

Further information on this part of the questionnaire can be obtained from Cindy Cohen (202-205-3230, [cindy.cohen@usitc.gov](mailto:cindy.cohen@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

**PRICE DATA**

- III-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 your firm imported from China and/or Turkey:

**Product 1.**-- Value or economy brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds. *Do not include drums sold or imported as part of an assembly or finished good.*

**Product 2.**-- Standard brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds. *Do not include drums sold or imported as part of an assembly or finished good.*

**Please note that values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts or rebates).**

- III-2a. During January 2021-March 2024, did your firm import from China and/or Turkey and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following pricing data tables as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question III-3.

III-2b. **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from China and sold by your firm.

## China

Report data in units and actual dollars (not \$1,000s).

(Quantity in units, value in dollars)								
	Sales to OEMs				Sales to aftermarket			
Period of shipment	Product 1		Product 2		Product 1		Product 2	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								

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

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

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

Product 1 (OEM):

Product 2 (OEM):

Product 1 (aftermarket):

Product 1 (aftermarket):

III-2c. **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from Turkey and sold by your firm.

## Turkey

Report data in units and actual dollars (not \$1,000s).

(Quantity in units, value in dollars)								
	Sales to OEMs				Sales to aftermarket			
Period of shipment	Product 1		Product 2		Product 1		Product 2	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								

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

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

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

Product 1 (OEM):

Product 2 (OEM):

Product 1 (aftermarket):

Product 1 (aftermarket):



III-2d. **Price data checklist.**--Please check that the pricing data in question III-2a have been correctly reported.

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

III-2e. **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

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

**PURCHASE COST DATA**

- III-3. **Imports for internal use or retail sale**--This question requests quarterly quantity and landed-duty paid value data for your firm's imports of the products defined above (on the first page of part III) for internal consumption or use for sales in your firm's retail locations from China and Turkey since January 1, 2021. These are imports that your firm either does not resell as brake drums or sells at retail.

During January 2021-March 2024, did your firm import any of the products listed on the first page of part III from China or Turkey for internal consumption or for sales in your firm's retail locations?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following tables as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question III-4.

III-3a. **Imports for internal use or retail sale (China).**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from China and used by your own firm or sold by your firm at retail.

Please note that values should be **landed, duty-paid (“LDP”)** and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

## China

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

(Quantity in units, value in dollars)								
Period of importation	OEM				Aftermarket			
	Product 1		Product 2		Product 1		Product 2	
	Quantity	LDP value	Quantity	LDP value	Quantity	LDP value	Quantity	LDP value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								

<sup>1</sup> LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). See “Import values” definition in Part II (Trade and Related Information – Definitions).

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

**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 data.

Product 1 (OEM):

Product 2 (OEM):

Product 1 (aftermarket):

Product 1 (aftermarket):

III-3b. **Imports for internal use or retail sale (Turkey).**— Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from Turkey and used by your own firm or sold by your firm at retail.

Please note that values should be landed, duty-paid (“LDP”) and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

## Turkey

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

(Quantity in units, value in dollars)								
Period of importation	OEM				Aftermarket			
	Product 1		Product 2		Product 1		Product 2	
	Quantity	LDP value	Quantity	LDP value	Quantity	LDP value	Quantity	LDP value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								

<sup>1</sup> LDP value (i.e., landed duty-paid values): Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States). See “Import values” definition in Part II (Trade and Related Information – Definitions).

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

**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 data.

Product 1 (OEM):

Product 2 (OEM):

Product 1 (aftermarket):

Product 1 (aftermarket):

III-3c. **Purchase cost data checklist.**--Please check that the purchase cost data in question III-3(a) and (b) have been correctly reported.

Are the purchase cost data reported above:	✓ if Yes
In actual dollars ( <b>not</b> \$1,000) and actual units?	<input type="checkbox"/>
Valued at landed duty-paid import value (i.e., value at the U.S. border after clearing Customs)?	<input type="checkbox"/>
Reported only for imports used for internal consumption or for your firm's retail sale?	<input type="checkbox"/>
Less than or equal to the quantities and values reported in part II for imports in each period?	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of these data, as Commission staff may contact your firm regarding questions. 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.*

**Complete these questions only if your firm reported data in III-3a or III-3b, otherwise skip to question III-4.**

**The following questions ask about the costs/benefits (not included in the LDP values reported above) that factor into your firm's decision to import brake drums rather than purchase from a U.S. producer or importer of brake drums.**

**III-3d. Additional costs for your firm's imports of brake drums for your firm's internal use or retail sale.—**

- i. Did your firm incur any additional costs by importing brake drums rather than purchasing from a U.S. producer or importer (e.g., logistical or supply chain management costs, warehousing/inventory carrying costs, insurance or other risk management fees, demurrage fees, indirect and overseas costs)?  
  
☐ No                      ☐ Yes—Please answer parts ii, iii, and iv.
- ii. Please provide an estimate of the total additional cost incurred (as a percentage compared to LDP value) when importing brake drums rather than purchasing from a U.S. producer or importer. (Report only the portion that is related to your firm's importing activities, either directly or indirectly, and not already included in the LDP value. Do NOT include any costs that also would be incurred if your firm purchased the product from a U.S. producer or importer.) \_\_\_\_\_ percent compared to LDP value.
- iii. Please identify and explain the specific additional costs incurred by your firm and estimate each cost (in percent) compared to the cost of importing. (Only report costs and the portion of each cost that was related to your firm's importing activities for brake drums, either directly or indirectly, and that are not already included in the LDP value. Do NOT report costs that your firm would incur when purchasing brake drums from a U.S. producer or importer.)

<b>Costs</b>	<b>Estimated percentage compared to LDP value (percent)</b>	<b>Explanation</b>
	%	
	%	
	%	
	%	

- iv. Briefly describe how your firm's additional costs (beyond the purchase price) by importing brake drums directly compare with the additional costs your firm incurs when purchasing from a U.S. producer or U.S. importer.

III-3d. **Decision basis.**—To which source(s) does your firm compare costs in determining whether or not to import brake drums? Check all that apply.

U.S. importers	U.S. producers	Neither U.S. importers nor U.S. producers
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III-3e. **Benefits of importing brake drums.**

- i. Briefly identify the benefits of importing brake drums instead of purchasing brake drums from a U.S. importer or from a U.S. producer.

--

- ii. Is it your firm's experience that the brake drums your firm imported from China and/or Turkey are priced lower than they would be if your firm purchased from a U.S. importer or U.S. producer?

Imports are priced lower when	No	Yes (If yes to either, please answer parts iii and iv.)
Not including the additional costs above	<input type="checkbox"/>	<input type="checkbox"/>
Including the additional costs above	<input type="checkbox"/>	<input type="checkbox"/>

- iii. Please estimate your firm's savings by importing brake drums instead of purchasing from a U.S. producer or U.S. importer since January 1, 2021 (as a percent of the purchase price from the U.S. importer or U.S. producer). For your estimate, compare the price of purchasing from a U.S. importer or U.S. producer to the cost of direct imports (including the additional costs described above in III-3b).

Factors	Estimated savings (percent of purchase price from U.S. importer/producer)
U.S. producer	%
U.S. importer	%

- iv. What methods or experience did you base the estimates in III-3diii (i.e. based on previous transactions with U.S. producers and/or U.S. importers, market research, etc.) Check all that apply.

Reported estimates in III-3diii based on	✓ if Yes
Previous company transactions	<input type="checkbox"/>
Market research	<input type="checkbox"/>
Other – Please explain	<input type="checkbox"/>

III-4. **Price setting.**--How does your firm determine the prices that it charges for sales of brake drums (*check all that apply*)?

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-5. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-6. **Pricing terms.**--On what basis are your firm's prices of imported brake drums from China and/or Turkey usually quoted (*check one*)?

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

III-7. **Contract versus spot.**-- Approximately what shares of your firm's sales of its brake drums from China and/or Turkey in 2023 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

Item	Type of sale				Total (should sum to 100.0%)
	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	
Share of 2023 sales	%	%	%	%	0.0 %



- III-8. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for brake drums imported from China and/or Turkey (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation (during contract period)	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	Quantity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs <sup>1</sup>	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<sup>1</sup> Please identify the indexes used: _____.				

- III-9. **Lead times.**-- What share of your firm's sales of its brake drums imported from China and/or Turkey was 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 imported brake drums?

Source	Share of 2023 sales	Lead time (Average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

**III-10. Shipping information.—**

- (a) Who generally arranges the transportation to your firm's customers' locations?  
☐ Your firm    ☐ Purchaser (*check one*)
- (b) When your firm sells brake drums imported from China and/or Turkey, from where is it shipped?  
☐ Point of importation    ☐ Storage facility (*check one*)
- (c) Indicate the approximate percentage of your firm's sales of brake drums imported from China and/or Turkey that are delivered the following distances from your firm's U.S. point of shipment.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total</b> (should sum to 100.0%)	0.0 %

- III-11. Geographical shipments.—**In which U.S. geographic market area(s) has your firm sold brake drums imported from subject countries since January 1, 2021(check all that apply)?

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

- III-12. Inland transportation costs.—**What is the approximate percentage of the cost of brake drums imported from China and/or Turkey that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent.

III-13. **End uses.**--List the end uses of the brake drums that your firm imports. For each end-use product, what percentage of the total cost is accounted for by brake drums and other inputs?

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

III-14. **Substitutes.**--Can other products be substituted for brake drums?

☐ No

☐ Yes--Please fill out the table.

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

III-15. **Demand trends.**-- Has demand within the United States and outside of the United States (if known) for brake drums steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021? Explain any trends and describe the principal factors that have affected these changes in demand.

Select one box per row.

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

- III-16. **Product changes.**--Have there been any significant changes in the product range, product mix or marketing of brake drums since January 1, 2021?

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

- III-17. **Business cycles.**--Is the brake drum market subject to business cycles, either during the year or across years? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-18. **Conditions of competition.**--Is the brake drum market subject to conditions of competition distinctive to brake drums other than the business cycles described in the previous question? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-19. **Supply constraints.**--Has your firm refused, declined, or been unable to supply brake drums at any time since January 1, 2021 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

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

- III-20. **Raw materials.**-- Have brake drum raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021?

Select one box per row.

Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how raw material price changes have affected your firm's selling prices for brake drums.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-21. **Interchangeability.**—How often are brake drums produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	Turkey	Other countries
United States			
China			
Turkey			
For any country-pair producing brake drums that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of brake drums produced in the countries:			

III-22. **Factors other than price.**—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between brake drums produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	Turkey	Other countries
United States			
China			
Turkey			
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 brake drums, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:			

- III-23. **Role of section 301 tariffs.**-- Did the tariffs on Chinese-origin products under section 301, or changes in these tariffs, have an impact on the brake drum market in the United States, including any effects on brake drum cost, price, supply, and/or demand, since January 1, 2021?

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

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

III-24. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for brake drums since January 1, 2021. Indicate the share of the quantity of your firm's U.S. shipments of brake drums that each of these customers accounted for in 2023.

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

III-25. **Other explanations.**--If your firm would like to further explain a response to a question in Part III 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 IV.--ALTERNATIVE PRODUCT INFORMATION**

Further information on this part of the questionnaire can be obtained from Mary Messer (202-205-3193, [mary.messer@usitc.gov](mailto:mary.messer@usitc.gov)).

IV-1. **Comparability of in-scope (cast iron) brake drums to out-of-scope (composite or steel) brake drums.**--For each of the following, indicate whether listed brake drums products are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.

F: fully comparable or the same, *i.e.*, have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

O: no familiarity with products.

(a) **Physical characteristics and end uses.**--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of <u>physical characteristics and end uses</u> :
In-scope (cast iron) brake drums vs Out-of-scope (composite or steel) brake drums		

(b) **Interchangeability.**--The ability to substitute the products in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of <u>interchangeability</u> :
In-scope (cast iron) brake drums vs Out-of-scope (composite or steel) brake drums		



IV-1. **Comparability of in-scope (cast iron) brake drums to out-of-scope (composite or steel) brake drums.**--*Continued*

F: fully comparable or the same, *i.e.*, have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

O: no familiarity with products.

- (c) **Channels of distribution.**--Channels of distribution/market situation through which the products are sold (i.e., sold OEM truck, OEM trailer, AFM truck, AFM trailer, etc.).

***"OEM"*** -- original equipment manufacturers that purchase brake drums as first-fit production parts to be installed on transportation vehicles (e.g., new trucks and trailers).

***"AFM"*** -- aftermarket suppliers that purchase brake drums to supply replacement brake drums to dealers, end users, or independent warehouse distributors.

<b>Product-pair</b>	<b>Comparison</b>	Please provide a narrative discussion for the comparability ratings you provided in terms of <u><i>channels of distribution</i></u> :
In-scope (cast iron) brake drums vs Out-of-scope (composite or steel) brake drums		

- (d) **Manufacturing facilities, production processes, and production employees.**--Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

<b>Product-pair</b>	<b>Comparison</b>	Please provide a narrative discussion for the comparability ratings you provided in terms of <u><i>manufacturing facilities, production processes, and production employees</i></u> :
In-scope (cast iron) brake drums vs Out-of-scope (composite or steel) brake drums		

IV-1. **Comparability of in-scope (cast iron) brake drums to out-of-scope (composite or steel) brake drums.**--*Continued*

F: fully comparable or the same, *i.e.*, have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

O: no familiarity with products.

(e) **Customer and producer perceptions.**--Perceptions as to the differences and/or similarities in the market (*e.g.*, sales/marketing practices).

<b>Product-pair</b>	<b>Comparison</b>	Please provide a narrative discussion for the comparability ratings you provided in terms of <u>customer and product perceptions</u> :
In-scope (cast iron) brake drums vs Out-of-scope (composite or steel) brake drums		

(f) **Price.**--Whether prices are comparable or differ between the products.

<b>Product-pair</b>	<b>Comparison</b>	Please provide a narrative discussion for the comparability ratings you provided in terms of <u>price</u> :
In-scope (cast iron) brake drums vs Out-of-scope (composite or steel) brake drums		

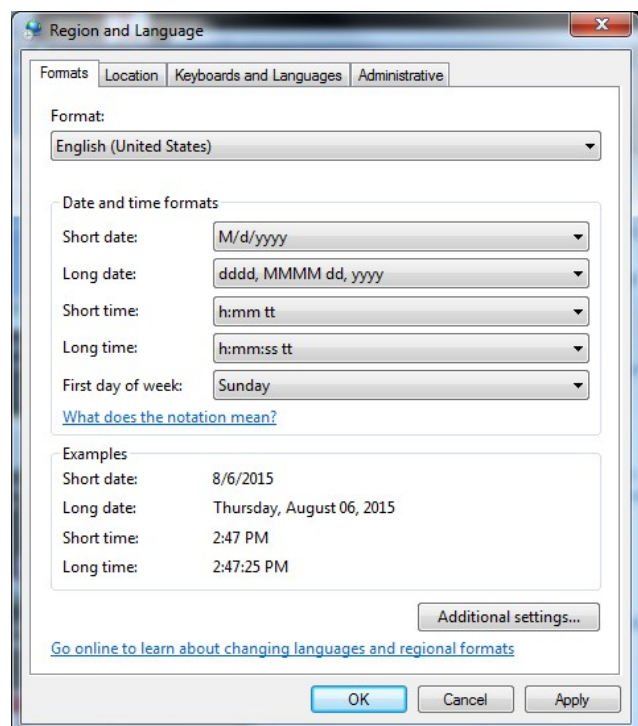
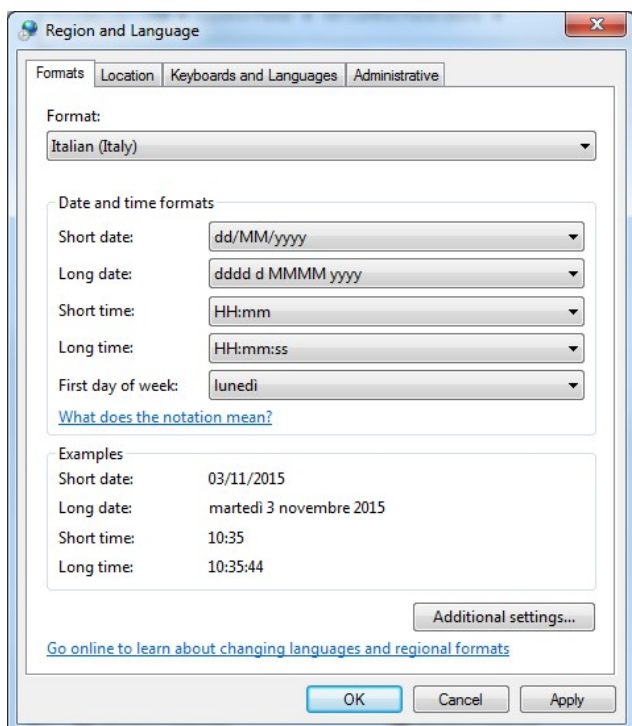
**Correcting valid number error messages.**--If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (i.e., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in the numeric form fields. This issue stems from your computer's number formatting setting (i.e., not the MS Word document itself, but the computer from which you are opening up the document). In the United States commas (",") delineate multiples of 1000 and periods (".") delineate fractions less than one. Many EU and other countries use the reverse where multiples of 1000 are delineated with periods (".") and fractions less than one are delineated with commas (","). The U.S. International Trade Commission's questionnaires are set-up in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU or other country number formatting, we believe this may cause this issue.

The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

To temporarily change your computer's number settings to U.S. settings, please do the following (for Microsoft Windows Operating system):

- START
- Control Panel
- Region and Language (under Clock, Language, and Region category)
- Format tab
- Change the Format from your existing one (e.g., "Italian (Turkey)") to "English (United States)" (see screen shots below)

When you do this the number "twelve million dollars and thirty five cents" would change from \$12.000.000,35 (Turkey format) to \$12,000,000.35 (U.S. format), and then there will be no conflict with the USITC importer questionnaire form. When you finish reporting the data then you can close the questionnaire and switch back to Turkey (or your country) settings.



# HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at:

[https://usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://usitc.gov/reports/active_import_injury_questionnaires).

***Please do not attempt to modify the format or permissions of the questionnaire document.*** Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

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

**Web address:** <https://usitc.gov/qportal>      **Pin:** BRAKE      **Phase:** Preliminary

• **E-mail.**— *E-mail the MS Word questionnaire to [mary.messer@usitc.gov](mailto:mary.messer@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 import this product,** please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission’s secure submission portal or email.

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