U.S. PRODUCERS' QUESTIONNAIRE

TRUCK AND BUS TIRES FROM THAILAND

This questionnaire must be received by the Commission by <u>August 7, 2024</u>
See last page for instructions regarding how to file this questionnaire.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping investigation concerning truck and bus tires from Thailand (Inv. No. 731-TA-1658) (Final)). 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

City	State Zi	p Code
Website		
Has your firm pro January 1, 2021?	oduced truck and bus tires (as defined on next page) in t	the United States at any time since
NO (S	Sign the certification below and promptly return only this page	e of the questionnaire to the Commission)
YES (C	Complete all parts of the questionnaire, and return the entire	questionnaire to the Commission)
About the information	CERTIFICATION	in is somethin and somethin the book
ge and belief and of f this certification ion provided in thi	CERTIFICATION tion herein supplied in response to this questionnai understand that the information submitted is subject a I also grant consent for the Commission, and its is questionnaire and throughout this proceeding in an ite or similar merchandise.	to audit and verification by the Commis employees and contract personnel, to
ge and belief and of this certification ion provided in thi mission on the sam dersigned, acknowing or other proceed (a) for developin and evaluations of 3; or (ii) by U.S. g	tion herein supplied in response to this questionnai understand that the information submitted is subject I also grant consent for the Commission, and its is questionnaire and throughout this proceeding in an	to audit and verification by the Commisemployees and contract personnel, to by other import-injury proceedings conductions is request for information and through mission, its employees and Offices, and ceeding, or (b) in internal investigations of the Commission including under
ge and belief and of this certification ion provided in thi mission on the sam dersigned, acknowing or other proceed (a) for developin and evaluations of 3; or (ii) by U.S. g	tion herein supplied in response to this questionnai understand that the information submitted is subject I also grant consent for the Commission, and its is questionnaire and throughout this proceeding in an ite or similar merchandise. I also grant consent for the Commission, and its is questionnaire and throughout this proceeding in an ite or similar merchandise. I also grant consent this proceeding in an ite or similar merchandise. I also grant consent in the programs of this or a related proceeding to the programs, personnel, and operation provernment employees and contract personnel, solely appropriate nondisclosure agreements.	to audit and verification by the Commisemployees and contract personnel, to by other import-injury proceedings conductions is request for information and through mission, its employees and Offices, and ceeding, or (b) in internal investigations of the Commission including under

PART I.—GENERAL INFORMATION

Background.-- This proceeding was instituted in response to a petition filed October 17, 2023, by the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC ("USW"), Pittsburgh, Pennsylvania. 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 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/8149/investigation/8496

<u>Truck and bus tires</u> covered by this proceeding are new pneumatic tires, of rubber, with a truck or bus size designation. Truck and bus tires covered by the scope may be tube-type, tubeless, radial, or non-radial (also known as bias construction or bias-ply).

Subject tires have, at the time of importation, the symbol "DOT" on the sidewall, certifying that the tire conforms to applicable motor vehicle safety standards. Subject tires may also have one of the following suffixes in their tire size designation, which also appear on the sidewall of the tire:

TR—Identifies tires for service on trucks or buses to differentiate them from similarly sized passenger car and light truck tires; and

HC—Identifies a 17.5 inch rim diameter code for use on low platform trailers.

All tires with a "TR" or "HC" suffix in their size designations are covered by the scope regardless of their intended use.

In addition, all tires that lack one of the above suffix markings are included in the scope, as well as all tires that include any other prefix or suffix in their sidewall markings, are included in the scope, regardless of their intended use, as long as the tire is of a size that fits trucks or busses. Sizes that fit trucks and busses include, but are not limited to, the numerical size designations listed in the "Truck-Bus" section of the *Tire and Rim Association Year Book*, as updated annually. The scope includes all tires that are of a size that fits trucks or busses, unless the tire falls within one of the specific exclusions set out below.

Truck and bus tires, whether or not mounted on wheels or rims, are included in the scope. However, if a subject tire is imported mounted on a wheel or rim, only the tire is covered by the scope. Subject merchandise includes truck and bus tires produced in the subject country whether mounted on wheels or rims in the subject country or in a third country. Truck and bus tires are covered whether or not they are accompanied by other parts, e.g., a wheel, rim, axle parts, bolts, nuts, etc. Truck and bus tires that enter attached to a vehicle are not covered by the scope.

Specifically excluded from the scope are the following types of tires: (1) pneumatic tires, of rubber, that are not new, including recycled and retreaded tires; (2) non-pneumatic tires, such as solid rubber tires; and (3) tires that exhibit each of the following physical characteristics: (a) the designation "MH" is molded into the tire's sidewall as part of the size designation; (b) the tire incorporates a warning, prominently molded on the sidewall, that the tire is for "Mobile Home Use Only;" and (c) the tire is of bias construction (also known as non-radial construction) as evidenced by the fact that the construction code included in the size designation molded into the tire's sidewall is not the letter "R."

The subject merchandise is currently imported under Harmonized Tariff Schedule of the United States (HTSUS) statistical reporting numbers: 4011.20.1015 and 4011.20.5020. Tires meeting the scope description may also be reported under the following HTSUS statistical reporting numbers: 4011.90.1010, 4011.90.1050, 4011.90.2010, 4011.90.2050, 4011.90.8010, 4011.90.8050, 8708.70.4530, 8708.70.4546, 8708.70.4548, 8708.70.4560, 8708.70.6030, 8708.70.6045, 8708.70.6060, and 8716.90.5059.

While HTSUS statistical reporting numbers are provided for convenience and for customs purposes, the written description of the subject merchandise is dispositive.

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

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

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

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.

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

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

Hours	Dollars	

Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please provide such comments to the Office of Investigations, import injury@usitc.gov.

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

Yes	☐ No
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I-2a. <u>Establishments covered</u>.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. Firms operating more than one establishment should combine the data for all establishments into a single report.

"<u>Establishment</u>"--Each facility of a firm involved in the <u>production</u> of truck and bus tires, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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

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

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

Law firm:	
Lead attorney(s):	

I-3. <u>Petitioner status.</u>--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

No	Yes

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

Country	Investigation type	Support	Oppose	Take no position
Thailand	Antidumping duty			

Firm name "Related firm" a firm that sole that was solely ointly owned, Related import	—A firm that you by or jointly owned or jointly owned managed, or oth	Country ur firm solely or jointly owned, managed, or otherwised, managed, or otherwised, managed, or otherwise controlled your fire	Extent of ownershi (percent) vned, managed, or otherwise coise controlled your firm; and/or e controlled by a firm that also s
"Related firm" If the firm that sole that was solely ointly owned, Related import	–A firm that you ly or jointly own or jointly owned managed, or oth	Country ur firm solely or jointly owned, managed, or otherwised, managed, or otherwised, managed, or otherwise controlled your fire	vned, managed, or otherwise coise controlled your firm; and/or e controlled by a firm that also s
a firm that sole that was solely ointly owned, Related import	y or jointly own or jointly owned managed, or oth	ned, managed, or otherwisd, managed, or otherwise nerwise controlled your fi	se controlled your firm; and/or controlled by a firm that also s
a firm that sole that was solely ointly owned, Related import	y or jointly own or jointly owned managed, or oth	ned, managed, or otherwisd, managed, or otherwise nerwise controlled your fi	se controlled your firm; and/or controlled by a firm that also s
a firm that sole that was solely ointly owned, Related import	y or jointly own or jointly owned managed, or oth	ned, managed, or otherwisd, managed, or otherwise nerwise controlled your fi	se controlled your firm; and/or controlled by a firm that also s
oreign that ar	eroj expertero.	-Does your firm have any	related firms, either domestic
-			es from Thailand into the United n Thailand to the United States?
No	YesList the	e following information.	
Firm name		Country	Affiliation
	production of tr	firm have any related firm ruck and bus tires? e following information.	ms, either domestic or foreign,
Firm name		Country	Affiliation

I-8. <u>Aftermarket distribution network.</u>—Does your firm, or a related firm, own its own aftermarket distribution network?

No	Yes ¹	If yes, please describe the geographic coverage of this network and the types of additional services your firm or the related firms provide to your customers through this network.
140	163	minis provide to your customers through this network.

¹ If yes, please ensure that all revenue and profit from your aftermarket distribution network is excluded from this questionnaire responses (e.g., question II-8 and III-9a). The revenues and profits in these tables should only reflect the results of your domestic production operations, and not further distribution and retailing operations.

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Peter Stebbins (202-205-2039, peter.stebbins@usitc.gov). **Supply all data requested on a calendar-year basis.**

II-1.	<u>Contact information</u> Please identify the responsible individual and the manner by which						
	Commission staff may contact that individual regarding the confidential information submitted						
	in Part II.	in Part II.					
	Name						
	Title						
	Email						
	Telephone						

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of truck and bus tires since January 1, 2021.

		If checked, please describe the nature, timing / duration, and impact on operations of any such reported changes as well as the business reasons for them; leave completely blank if not applicable
	Plant openings	
	Plant closings	
	Prolonged shutdowns	
	Production curtailments	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Weather-related or force majeure events	
	Other (e.g., revised labor agreements, technology)	

II-2b.	COVID-19	pandemic.—
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(i)	Has the COVID-19 pandemic or have any government actions taken to contain the spread of
	the COVID-19 virus resulted in changes in your firm's supply chain arrangements,
	production, employment, and shipments relating to truck and bus tires? In your response,
	please discuss the duration and timing of any such changes as they relate to your firm's
	operations.

No	Yes		If yes, describe these changes including the impact over time on the (a) supply chain, (b) production and shipments, and (c) employment with respect to truck and bus tires.
			what extent did your firm experience delays fulfilling truck and bus tire orders COVID-19?
			s both a U.S. producer and U.S. importer, were the delays more significant for produced or imported tires?
(iv)	When w	/ere	any delays resolved?
(v)	Were the	e de	lays more significant with aftermarket or OEM sales?

II-3a. Production using same machinery.--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce truck and bus tires, and the combined capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

"Installed overall capacity" – The level of production that your establishment(s) could have attained, assuming your firm's optimal product mix, and based solely on existing capital investments, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does <u>not</u> take into account other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity.

"Practical overall capacity" – The level of production that your establishment(s) could reasonably have expected to attain, taking into account your firm's actual product mix over the period. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate; but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) your firm's existing in place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited your firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production your firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

"Practical truck and bus tires capacity" – The level of production of truck and bus tires that your establishment(s) could reasonably have expected to attain. The same assumptions apply to this capacity measure as for practical overall capacity, but only includes the portion of practical overall capacity allocated to the production of truck and bus tires based on the actual product mix experienced over the period.

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

Takes into account	Installed overall capacity	Practical overall capacity	Practical truck and bus tires capacity
Existing capital investments	Yes	Yes	Yes
Product mix	Yes	Yes	Yes
Normal downtime, maintenance, repair and clean-up	No	Yes	Yes
Existing labor force	No	Yes	Yes
Availability of material inputs	No	Yes	Yes
Actual number of shifts and hours operated	No	Yes	Yes
Limited to truck and bus tires	No	No	Yes

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

Quantity (in 1,000 tires)					
	C	Calendar year	Januar	y-June	
Item	2021	2022	2023	2023	2024
Capacity measures: Installed overall capacity ¹					
Practical overall capacity ¹²					
Practical truck and bus tires capacity ^{3 4}	0	0	0	0	0
Production of: Truck and bus tires ^{3 4}	0	0	0	0	0
Other out-of-scope products: Passenger vehicle and light truck (PVLT) tires					
Off-the-road (OTR) tires					
Other products ⁵					
Subtotal, all out-of-scope products	0	0	0	0	0
Total production using same machinery or workers	0	0	0	0	0

¹ Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period.

² Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" overall capacity and "practical" overall capacity.

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

⁴ Data reported for practical truck and bus tires capacity should be greater than the data reported for production of truck and bus tires in each period, if not revise prior to submission to the Commission. Additionally, if your firm reports the production of no other products on the same machinery and using the same workers as truck and bus tires then "practical overall" and "practical truck and bus tires" capacity measures should be equal to each other.

⁵ Please identify these products: _____.

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U.S.	Producers	Questionnaire :	– rruck and	bus rires	trinai

II-3b.	Operating parametersThe prooperating parameters:	actical overall capacity reported in	ı II-3a is based on the following
	Hours per week	Weeks per year	
II-3c.		escribe the methodology used to ported in II-3a, and explain any ch	•

II-3d. Practical overall capacity constraints.--Please describe the constraint(s) that set the limit(s) on your firm's practical overall capacity over the period reported in question II-3a. If different constraints were binding over different periods reported, please specify when each constraint was limiting your reported practical overall capacity. If a constraint was not actually binding over the period reported, but was still a constraint to achieving the installed capacity level, indicate at what level it would have been binding.

Constraint (check as many as appropriate)		Description (If checked, please describe the details, timing, and duration of the constraint; leave completely blank if not applicable)
	Production bottlenecks	
	Existing labor force	
	Supply of material inputs	
	Fuel or energy	
	Storage capacity	
	Logistics/transportation	
	Other constraints (list the specific constraints in the description field)	

U.S. Producers' Questionnaire – Truck and Bus Tires (Final) Page 13 Reaching installed overall capacity. -- Please describe and quantify the amount of time it would take II-3e. and the additional actions that would be needed (e.g., hiring new workers, expanding shifts, procuring larger sources of raw material supply, etc.) for your firm to be able to fully utilize the reported installed overall capacity reported in II-3a. II-3f. Excess capacity: To the extent that your company is reporting excess capacity, please report, with specificity: (1) which machines or equipment (or other elements of production) would need to be brought back into production for your plant to operate at full capacity, and (2) the specific dates on which such machines or equipment were last used by your plant to produce truck and bus tires. II-4. Product shifting.— (a) Is your firm able to switch production (capacity) between truck and bus tires and other products using the same equipment and/or labor? If yes—(i.e., have produced other products or are able to produce other No Yes products) Please identify other actual or potential products. (b) Please describe the factors that affect your firm's ability to shift capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

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

Item	√ if Yes
Are all three capacity measures reported based on <u>currently installed</u> <u>machinery and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	
Are practical overall capacity and practical truck and bus tires capacity measures reported based on <u>existing labor force</u> (i.e., the reported capacity level would not require hiring additional production related workers or adding shifts)?	
Are practical overall capacity and practical truck and bus tires capacity measures based on the actual availability of material inputs?	
Do both practical overall capacity and practical truck and bus tires capacity measures account for <u>normal downtime, maintenance, repair and clean-up</u> activities?	
Does the difference between practical overall capacity and practical truck and bus tires capacity equal the portion of practical overall capacity that is dedicated to the production of out-of-scope products?	

Note: If your firm is not able to answer "yes" to any of the above criteria as it relates to your firm's reported capacity levels, please revise your capacity numbers to be in conformance with the appropriate definition prior to submission to the Commission.

II-6. **Tolling**.--Since January 1, 2021, has your firm been involved in a toll agreement regarding the production of truck and bus tires?

"Toll agreement"-- Agreement between two firms whereby the first firm ("tollee") furnishes the raw materials and the second firm ("toller") uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	
		If yes—Please complete the table below.

Does your firm act as the toller or tollee in this arrangement?	Toller:	Tollee:	
Report the share of your firm's production of truck and bus tires th included in this toll arrangement in 2023.	%		
Please describe the activities performed in this tolling arrangement:			
Please indicate the name(s) of the firm(s) involved:			

II-7.	Foreign	trade	zones

(a) <u>Firm's FTZ operations</u>.--Does your firm produce truck and bus tires in and/or admit truck and bus tires into a foreign trade zone (FTZ)?

"Foreign trade zone" is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	If yesDescribe the nature of your firm's operations in FTZs and identify the specific FTZ site(s).

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

No	Yes	If yesIdentify the firms and the FTZs.

II-8. **Shipments and inventory data.--**Report your firm's uses (shipment or storage) of domestically produced truck and bus tires during the specified periods.

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

"Lease U.S. shipments" – Shipments made within the United States of a commercial transaction in the ordinary course of business in which your firm retains the legal ownership of/title to the tires shipped. Report lease shipment quantities once at the time of an actual physical transfer of a tire to the lessee(s): include both initial shipments and replacement shipment quantities. Report lease shipment values at fair market value at the time of physical transfer of the tire to the lessee.

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

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

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

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

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

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

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

Quantity (in 1,000 tires) and value (in \$1,000)					
_		Calendar year	January-June		
Item	2021	2022	2023	2023	2024
Practical truck and bus tires capacity¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production ¹ (quantity) (C)					
U.S. shipments: Commercial shipments: 2 Quantity (D)					
Value (E)					
Lease shipments: Quantity (F)					
Value³ (G)					
Internal consumption: Quantity (H)					
Value³ (I)					
Transfers to related firms: Quantity (J)					
Value³ (K)					
Export shipments: ⁴ Quantity (L)					
Value (M)					
End-of-period inventories (quantity) (N)					
¹ Data for this indicator will populate in q ² Please report the share of the quantity of that were mounted on a wheel or rim: ³ Lease shipments, internal consumption firm uses a different basis for valuing these etc.): . However, the data provided all	of your firm's L _ percent. and transfers t transactions in	o related firms r	shipments of tr nust be valued lease specify th	at fair market v at basis (e.g., c	alue. If yo

³ Identify your firm's principal export markets: ______.

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

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

	Calendar year		January-June		
Reconciliation	2021	2022	2023	2023	2024
B+C-D-F-H-J-L-N = should					
equal zero ("0") or provide an					
explanation. ¹	0	0	0	0	0

¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:_____.

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

"Branded tire"--A truck or bus tire produced or packaged for sale under the name of the manufacturer of the tire or a brand name owned by the manufacturer.

"Private label tire" -- A truck or bus tire produced or packaged for sale under the name other than of the manufacturer of the tire or a brand name owned by the manufacturer.

Quantity (in 1,000 tires)						
	Calendar year			January-June		
Item	2021	2022	2023	2023	2024	
U.S. shipments:						
to OEMs:						
Private label:						
Quantity (O)						
Value (P)						
Branded:						
Quantity (Q)						
Value (R)						
to Aftermarket suppliers:						
Private label:						
Quantity (S)						
Value (T)						
Branded:						
Quantity (U)						
Value (V)						

RECONCILIATION OF U.S. SHIPMENTS BY BRANDING AND CHANNELS.-- Please ensure that the quantities and values reported for channels of distribution and branding in this table (i.e., lines O through V) in each time period equal the quantities and values reported for U.S. shipments in question II-8 above (i.e., lines D through K) in each time period. If the calculated fields below return values other than zero (i.e., "O"), the data reported must be revised prior to submission to the Commission.

	Calendar year		January-June		
Reconciliation	2021	2022	2023	2023	2024
Quantity: O + Q + S + U – D – F – H – J					
= zero ("0"), if not revise.	0	0	0	0	0
Value: P + R + T + V - E - G - I - K =					
zero ("0"), if not revise.	0	0	0	0	0

II-10. <u>Inventory under lease</u>.—Please indicate the total number of tires your firm had outstanding on lease on the dates listed below.

	December 31, 2021	December 31, 2022	December 31, 2023	June 30, 2023	June 30, 2024
Total quantity of tires under lease obligations outstanding (in 1,000 tires)					

II-11. <u>Employment data</u>.--Report your firm's employment-related data related to the production of truck and bus tires and provide an explanation for any trends in these data.

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

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to June periods, calculate similarly and divide by 6.

If your firm had the same number of PRWs in all calendar years and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3).

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

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

	Calendar year		January-June		
Item	2021	2022	2023	2023	2024
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

Explanation of trends:

II-12.	Related firmsIf your firm reported transfers to related firms in question II-8, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.
II-13.	<u>Purchases</u> Has your firm purchased truck and bus tires produced in the United States or in other countries since January 1, 2021? (Do not include imports for which your firm was the

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

importer of record. These should be reported in an importer questionnaire.)

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

No	If yesReport such purchases in the table below and explain the reasons for your firm's purchases.

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

(Quantity in 1,000 units)						
	(Calendar year	r	January-June		
Item	2021	2022	2023	2023	2024	
Purchases from U.S. importers of truck and bus tires from— Thailand: Bridgestone ¹						
Thailand: Prinx Chengshan ²						
Thailand: All other suppliers ³ Thailand: All suppliers	0	0	0	0	0	
All other sources⁴						
Purchases from domestic producers ⁵						
Purchases from other sources ⁶						
Purchases from all sources	0	0	0	0	0	

¹ Thailand: Bridgestone = Truck and bus tires from Bridgestone Corporation ("Bridgestone") in Thailand.

² Thailand: Prinx Chengshan = Truck and bus tires from Prinx Chengshan Tire (Thailand) Co. Ltd, ("Prinx Chengshan") in Thailand.

³ Thailand: All other suppliers = Truck and bus tires from all sources other than Bridgestone and Prinx in Thailand.

⁴ Please list the name of the nonsubject importer(s) from which your firm purchased this product: _____.

Flease list the name of the U.S. producer(s) from which your firm purchased this product: _____.

⁶ Please list the name of the firm(s) from which your firm purchased this product: _____.

II-14. <u>Purchases of imports from Thailand</u>.-- If your firm reported purchases from U.S. importers of truck and bus tires from Thailand at any time since January 1, 2021, report those purchases by the individual importer of record and foreign producer.

Purchases of imports from Thailand

Quantity (in 1,000 tires)						
			Calendar yea	ar	January-June	
Importer of record	Foreign producer	2021	2022	2023	2023	2024
Grand total:		0	0	0	0	0

<u>RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES</u>.--Please ensure that the quantities reported for your firms purchases of imports from subject sources reported in this question (i.e., "total purchases of imports from subject sources") in each time period equal the quantity reported for your firm's purchases from subject sources in each time period in the previous question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year		January-June		
Reconciliation	2021	2022	2023	2023	2024
Purchases from subject sources in					
this table – purchases from subject					
sources in previous table = zero					
("0"), if not revise.	0	0	0	0	0

II-17.	Imports Since Januar	y 1, 2021, has v	your firm impo	orted truck and I	bus tires?
--------	-----------------------------	------------------	----------------	-------------------	------------

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

II-18.	Other explanationsIf your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Emily Kim (202-205-1800, emily.kim@usitc.gov

Name	
Title	
Email	2000
Teleph	ione
2. <u>Accou</u>	nting system.—Briefly describe your firm's financial accounting system.
A1.	When does your firm's fiscal year end (month and day)?
	If your firm's fiscal year changed since January 1, 2021, explain below:
A.2.	Note: Calendar-year data are preferred for the annual-year financial data in this section
	(i.e., in questions III-9a, III-9d, III-12a, and III-13a). However, if providing this data on a
	calendar-year basis is unduly burdensome or provides results that are not reliable,
	fiscal-year based data are acceptable. Please indicate whether the results in this section
	are provided on a calendar-year basis (including firms with a calendar-year based fiscal year) or on a fiscal-year basis that does not align with the calendar year.
	yeary or on a risear year basis that abes not angir with the earthair year.
	☐ Calendar-year basis ☐ Fiscal-year basis (does not align with the calendar year)
B.1.	Describe the lowest level of operations (e.g., plant, division, company-wide) for which
	financial statements are prepared that include truck and bus tires:
DЭ	Door your firm propers profit/loss statements for truck and bus tires.
B.2.	Does your firm prepare profit/loss statements for truck and bus tires: No
	☐ Yes ☐ No
B.2. B.3.	

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

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

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

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

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

Products	Share of sales in 2023
Truck and bus tires	%
	%
	%
	%
	%

or any servinclusive or same comp YesCo Inputs from bus tires the	rices) used f transacti pany)? entinue to marelated nat your fi	in the proons between question suppliers.	oduction of een related III-6. [—Please icuses from re	lentify the input elated suppliers ort this informat	e to question I s used in the I	related sup componer II-8. production reflected in	of tru ques 2023	s (e.g., thin the uck and tion III-
Inputs fror bus tires th 9a. For "Sh	n related nat your fi	suppliers. m purcha	.—Please id ises from re please rep	lentify the input elated suppliers ort this informat	s used in the pand that are r	production eflected in nt input for	ques 2023 of tota	tion III- 3.
bus tires th 9a. For "Sh	nat your fi	m purcha	please rep	elated suppliers ort this informat	and that are r	reflected in nt input for	ques 2023 of tota	tion III- 3.
Input			Related	supplier		Share o		ıl
Input			Related	supplier			• 202	
				-		COGS i	1 2023	
								%
								%
								%
								%
	-	ourchase o	ost valuat	ion method		Check a	all tha	at apply
Related s								
Cost plus	•							
Negotiate	d transfe	price to a	approximat	e fair market va	lue			
Other (sp	ecify):							
If the met	thods used	l differ by	input, plea	se describe:				
from relate	ed supplie	rs, as iden	tified in III-	6, were reporte	d in III-9a (fina	ancial resul	-	
Yes	No			planation and tl	ne valuation b	asis used fo	or the	se input
t f	Related so Cost plus Negotiate Other (sp If the met nputs fror from relate ous tires) in	Related supplier's c Cost plus Negotiated transfer Other (specify): If the methods used from related supplier ous tires) in a manne	Purchase of Related supplier's cost Cost plus Negotiated transfer price to a Other (specify): If the methods used differ by specific suppliers from related suppliers, as identity in a manner consister price to a pustires) in a manner consister price to a specific suppliers.	Purchase cost valuation Related supplier's cost Cost plus Negotiated transfer price to approximate Other (specify): If the methods used differ by input, please of the purchase suppliers, as identified in Illous tires) in a manner consistent with the lift no—Provide an expecification.	Purchase cost valuation method Related supplier's cost Cost plus Negotiated transfer price to approximate fair market va Other (specify): If the methods used differ by input, please describe: Inputs from related suppliers valuation method.—Please from related suppliers, as identified in III-6, were reported ous tires) in a manner consistent with the firm's accounting of the name of the	Purchase cost valuation method Related supplier's cost Cost plus Negotiated transfer price to approximate fair market value Other (specify): If the methods used differ by input, please describe: nputs from related suppliers valuation method.—Please confirm that from related suppliers, as identified in III-6, were reported in III-9a (final pus tires) in a manner consistent with the firm's accounting books and	Purchase cost valuation method Related supplier's cost Cost plus Negotiated transfer price to approximate fair market value Other (specify): If the methods used differ by input, please describe: Inputs from related suppliers valuation method.—Please confirm that the inputs from related suppliers, as identified in III-6, were reported in III-9a (financial resultations tires) in a manner consistent with the firm's accounting books and records. If no—Provide an explanation and the valuation basis used for	Purchase cost valuation method Related supplier's cost Cost plus Negotiated transfer price to approximate fair market value Other (specify): If the methods used differ by input, please describe: If the methods used differ by input, please describe: Inputs from related suppliers valuation method. Please confirm that the inputs purchase rom related suppliers, as identified in III-6, were reported in III-9a (financial results on ous tires) in a manner consistent with the firm's accounting books and records. If no—Provide an explanation and the valuation basis used for the

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

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

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

Net sales—Report all commercial sales, internal consumption, and transfers to related firms, whether these are domestic sales or exports. Report net sales values less discounts, returns, allowances, and prepaid freight, in U.S. dollars, f.o.b. your point of shipment. The freight costs associated with delivering the product to your customer should not be included.

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

Lease sales — Sales made of a commercial transaction in the ordinary course of business in which your firm retains the legal ownership of/title to the tires sold. Report lease sales quantities once at the time of an actual physical transfer of a tire to the lessee(s): include both initial sales quantities and replacement quantities. Report lease sales values at fair market value at the time of physical transfer of the tire to the lessee(s).

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

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

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

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

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

III-9a. **Operations on truck and bus tires**.—**Continued**

Quantity (in number of tires) and value (in \$1,000)						
		Years		January	/-June	
Item	2021	2022	2023	2023	2024	
Net sales quantities: Commercial sales						
Lease sales						
Internal consumption						
Transfers to related firms						
Total net sales quantities	0	0	0	0	0	
Net sales values: Commercial sales						
Lease sales						
Internal consumption						
Transfers to related firms						
Total net sales values	0	0	0	0	0	
Cost of goods sold (COGS): Raw materials						
Direct labor						
Other factory costs						
Total COGS	0	0	0	0	0	
Gross profit or (loss)	0	0	0	0	0	
SG&A expenses						
Operating income (loss)	0	0	0	0	0	
Other expenses and income: Interest expense						
All other expense items						
All other income items						
Net income or (loss) before						
income taxes	0	0	0	0	0	

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

		If noIf the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise.
		Also, check signs accorded to the post operating income line items. The two expense line items should report positive numbers (i.e., expenses are positive, and incomes or reversals are negative in these lines – instances of the latter should be rare in these lines). The income line item should also, in most instances, be a positive number (i.e., income is positive, and expenses or reversals are negative in this line).
Yes	No	If, after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated line items persist, please identify and discuss the differences in the space below.

III-9c. Raw materials.—Please report the share of total raw material costs in 2023 (reported in III-9a) for the following raw material inputs:

		Procurement method		
Input	Share of total raw material costs (percent)	Primarily produced by your firm	Primarily purchased by your firm	
Rubber (natural and/or synthetic)				
Carbon black				
Chemicals and oil				
Bead and belt wire				
Other raw material inputs ¹				
Total (should sum to 100 percent)	0.0			

¹ If there are notable or significant raw material inputs included within the "other material inputs" category, please list those here and provide the share of the total raw material costs for which they account:

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

	Years		January-June		
Item	2021	2022	2023	2023	2024
Depreciation expense (in \$1,000)					

III-9e.	<u>Depreciation expense classification</u> .—Please indicate the line item(s) within question III-9a (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.
III-9f.	Sales of mounted truck and bus tires. —Of the data provided in question III-9a, please provide the share (percent) that your firm sold in 2023 as mounted truck and bus tires: sales quantity percent; sales value percent; and total costs/expenses (COGS and SG&A expenses) percent.
III-9g.	<u>Selling/marketing expenses for truck and bus tires</u> .—Please describe the primary selling and marketing expenses reported in question III-9a and the manner in which these expenses are distinct with respect to the OEM and replacement markets.
III-9h.	<u>Tire leasing operations.</u> – Please provide information on your firm's tire leasing operations
	Fee basis:
	Accounting recognition: primarily as capital leases, primarily as operating leases, or evenly split between capital and operating leases. Please describe:
	Maintenance and service obligations:
	Lessee customers:

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

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

	Years		Januar	y-June	
Item	2021	2022	2023	2023	2024
			Value (<i>\$1,000</i>)		
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

III-10b. Nonrecurring items (charges and gains) included in the truck and bus tires financial results.—
In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

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

III-11.	Classification of identified nonrecurring items (charges and gains) in the accounting books and
	records of the company.—If non-recurring items were reported in question III-10 above, please
	identify where your company recorded these items in your accounting books and records in the
	normal course of business, just as responses to question III-10 identify the specific line items in question III-9a where these items are reported.

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U.S.	ribuuceis	Questionnane	- Huck allu	Dus IIIes	(FIIIai)

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

Note: Total assets should reflect the <u>net amount of assets</u> (i.e., after any accumulated depreciation and allowances deducted) and should be <u>allocated to truck and bus tires</u> if these assets are also related to other products.

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

III-12b.	<u>Description of asset values</u> .—Please provide explanations for any substantial changes in total
	asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also
	describe the main asset categories (e.g., cash and cash equivalents, accounts receivable,
	inventory, investments, PPE, vehicles, furniture, and patents/intangible asset) included in the
	above response.

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

Value (<i>in \$1,000</i>)					
	Years January-June				
Item	2021	2022	2023	2023	2024
Capital expenditures					
R&D expenses					

III-13b.	<u>Description of reported capital expenditures</u> .—Please describe the nature, focus, and significance of your firm's reported capital expenditures. If no capital expenditure data were reported, please explain the reason.
III-13c.	<u>Description of reported R&D expenses</u> .—Please describe the nature, focus, and significance of your firm's reported R&D expenses.

III-14a. <u>Data consistency and reconciliation</u>.—The quantities and values of total net sales reported in question III-9a should reconcile with the total shipments reported in question II-8 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis. The interim-period data should reconcile whether the financial data are on a calendar- or fiscal-year basis.

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

	Years			January-June	
Reconciliation	2021	2022	2023	2023	2024
Quantity: Trade data from question II-8 (lines D, F, H, J and L) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
Value: Trade data from question II-8 (lines E, G, I, K, and M) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

		7.		•)		
	Is the financial data in question III-9a reported on a calendar-year basis?						
	Yes—Complete question III-14b. No— Complete question III-14c.						
	III-14b. <u>Data consistency and reconciliation (calendar-year based financial data)</u> .—Do the data in question III-9a reconcile with the data in question II-8 (i.e., the calculated fields are returning zeros in the table above) <u>for all periods</u> ?						
	Yes	No	No If no, please explain.				
III-14c. Data consistency and reconciliation (non-calendar-year based financial data).—Do the data in question III-9a reconcile with the data in question II-8 (i.e., the calculated fields are returning zeros) for the January-June periods?							
	Yes	No	If no, please	explain.			

If your responses to any of the items in questions III-15, III-16, and III-17 differ based on foreign supplier(s) in Thailand, please describe these differences and, as applicable, indicate which country or countries of foreign supplier(s) your response refers to in the relevant form fields.

III-15. <u>Effects of imports on investment</u>.—Since January 1, 2021, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of truck and bus tires from Thailand?

	1	1		
No	Yes			
		If yes, my firm has experienced actual negative effects as follows.		
	(chec	k as many as appropriate)	(please describe)	
		Cancellation, postponement, or rejection of expansion projects		
		Denial or rejection of investment proposal		
		Reduction in the size of capital investments		
		Return on specific investments negatively impacted		
		Other		

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

	. the pro	addit as a result of imports o	The second substitutes from Financia.	
No	Yes			
		If yes, my firm has experienced actual negative effects as follows.		
	(chec	ck as many as appropriate)	(please describe)	
		Rejection of bank loans		
		Lowering of credit rating		
		Problem related to the issue of stocks or bonds		
		Ability to service debt		
		Other		

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III-17.	-		of imports.—Does your firm anticipate any negative effects due to imposs from Thailand?	orts
	No	Yes	If yes, my firm anticipates negative effects as follows.	
III-18.	governme performar	nt actions nce of you onse, pleas	performance of COVID-19.—Has the COVID-19 pandemic, or any taken to contain the spread of the COVID-19 virus, affected the financial firm's operations on truck and bus tires as reported in question III-9a? se include the duration and timing of any impacts as they relate to your ormance.	
	No	Yes	If yes, please describe these effects.	
III-19.	III for which	ch a narrat	—If your firm would like to further explain a response to a question in P live box was not provided, please note the question number and the pace provided below. Please also use this space to highlight any issues ye	

firm had in providing the data in this section.

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Amelia Preece (202-205-3250, amelia.preece@usitc.gov).

IV-1. <u>Contact information</u>.--Please identify the individual that Commission staff may contact regarding the confidential information submitted in Part IV.

Name	
Title	
Email	
Telephone	

PRICE DATA

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2021 of the following products produced by your firm.
 - **Product 1.--** Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).
 - **Product 2.--** Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).
 - **Product 3.--** Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).
 - **Product 4.--** Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

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

IV-2a. During January 2021 – June 2024, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

YesPlease complete the following pricing data tables as appropriate.
NoSkip to question IV-3.

IV-2b. Price data.--Report below the quarterly price data¹ for pricing products² produced and sold by your firm to original equipment manufacturers (OEMs). Do not include lease transactions in these reported pricing data.

US – SALES TO OEMs

Report data in *number of tires* and *actual dollars* (not 1,000s).

(Quantity in number of tires, value in dollars)								
	Product 1		Produ	ıct 2	Product 3		Product 4	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2021: January-March								
April-June								
July-September								
October-December								
2022: January-March								
April-June								
July-September								
October-December								
2023: January-March								
April-June								
July-September								
October-December								
2024: January-March								
April-June								
¹ Net values (i.e., gross firm's U.S. point of shipmen ² Pricing product defini	t. Please subtra tions are provic	ct any discour led on the firs	nts, rebates, and t page of Part IV	returns from	the quarter in w	hich the sale o	occurred.	·
NoteIf your firm's produc	t does not exac	tly meet the p	roduct specificat	tions but is co	mpetitive with t	ne specified p	roduct, provide	a description

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

Product 1:			
Product 2:			
Product 3:			
Product 4:			

IV-2c. Price data. — Continued --Report below the quarterly price data¹ for pricing products² produced and sold by your firm into the aftermarket (e.g., to dealers and service centers for tire replacements). Do not include lease transactions in these reported pricing data.

US – SALES TO AFTERMARKET

Report data in *number of tires* and *actual dollars* (not 1,000s).

	Product 1				Product 3		Product 4	
Period of shipment	Quantity	Value	Produ Quantity	Value	Quantity	Value	Quantity	Value
2021:								
January-March								
April-June								
July-September								
October-December								
2022:								
January-March								
April-June								
July-September								
October-December								
2023:								
January-March								
April-June								
July-September								
October-December								
2024:								
January-March								
April-June								

NoteIf your firm's	product does not exactl	y meet the product s	specifications but	: is competitive v	vith the specified	product, prov	vide a de	escription
of your firm's produc	ct. Also, please explain a	ny anomalies in you	r firm's reported	pricing data.				

Product 1:			
Product 2:			
Product 3:			
Product 4:			

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

	Are the price data reported above:	√ if Yes
	In actual dollars (not \$1,000) and number of tires?	
	Valued f.o.b. U.S. point of shipment (i.e., exclude U.S. inland transportation costs)?	
	Reported net of all discounts, rebates, and returns (deducted from the quarter in which the original sale occurred)?	
	Reported for commercial U.S. shipments only (i.e., exclude internal consumption, transfers, and exports)?	
	Less than or equal to the quantities and values reported in part II for commercial U.S. shipments in each period?	
	Explanation(s) for any boxes not checked:	
IV-2d.	Pricing data methodologyPlease describe the method and the kinds of documents/that were used to compile your price data.	records

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

IV-3.	Price settingHow does your firm determine the prices that it charges for sales of truck and but
	tires (check all that apply)?

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

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

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

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

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

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

IV-7. <u>Contract provisions.</u>—

(a) Please fill out the table regarding your firm's typical <u>OEM</u> sales contracts for U.S.-produced truck and bus tires (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

OEM sales				
Typical sales contract provisions	ltem	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
ana, or price	Both			
Indexed to raw	Yes			
material costs ¹	No			
Not applicable				
¹ Please identify the indexes used:				

IV-7. **Contract provisions.**—Continued

(b) Please fill out the table regarding your firm's typical <u>aftermarket</u> sales contracts for U.S.-produced truck and bus tires (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Aftermarket				
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	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
ana, en price	Both			
Indexed to raw	Yes			
material costs ¹	No			
Not applicab	le			
¹ Please identify the indexes used:				

IV-8. <u>Lead times.</u>— Report your firm's share of sales of its U.S.-produced truck and bus tires from inventory and produced to order, and the average lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced truck and bus tires during each period listed.

Period	Type of sale	Share of sales	Average lead time (number of days)
	From inventory	%	
2021	Produced to order	%	
	Total 2021 (should sum to 100.0%)	0.0 %	
	From inventory	%	
2022	Produced to order	%	
	Total 2022 (should sum to 100.0%)	0.0 %	
	From inventory	%	
2023	Produced to order	%	
	Total 2023 (should sum to 100.0%)	0.0 %	

IV-9.	<u>Shippir</u>	ng information
	(a)	Who generally arranges the transportation to your firm's customers' locations? Your firm Purchaser (check one)
	(b)	Indicate the approximate percentage of your firm's sales of truck and bus tires that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

IV-10. <u>Geographical shipments.</u>—In which U.S. geographic market area(s) has your firm sold its U.S.-produced truck and bus tires since January 1, 2021 (check all that apply)?

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

IV-11.	<u>Inland transportation costs.</u> —What is the approximate percentage of the cos	t of U.Sproduced
	truck and bus tires that is accounted for by U.S. inland transportation costs?	percent

IV-12. <u>End uses.</u>--List the end uses of the truck and bus tires that your firm manufactures. For each end-use product, what percentage of the <u>total cost</u> is accounted for by truck and bus tires and other inputs?

	Share of total cost of end use product accounted for by:				Total (should	
End-use product	Truck and bus tires		Other inputs		sum to 100.0% across)	
For OEMs, a new Heavy Duty (Class 7 or 8) Truck or Bus ¹	%	+	%	11	0.0 %	
For OEMs, a new Medium Duty (Class 6 or lower) Truck or Bus ¹	%	+	%	II	0.0 %	
Other ²	%	+	%	П	0.0 %	

¹ The share of the total cost for an OEM to produce the specified class of truck or bus tires (estimates are acceptable). The other inputs include everything else that makes up a truck/bus. Include trailer costs in this calculation/analysis if appropriate.

² Describe the end use

IV-13.	<u>Substitutes</u> Can other products be substituted for truck and bus tires?

Yes--Please fill out the table.

☐ No

3.

	End use in which this	Have changes in the price of this substitute affected the price for truck and bus tires?			
Substitute	substitute is used	No	Yes	Explanation	

IV-14. <u>Demand trends.</u>— Has demand within the United States and outside of the United States (if known) for truck and bus tires 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.

Calaat a aa la		ie principai	iactors triat i	iave arrec	ieu tilese t	manges in C	gernanu.			
Select one bo	ox per row. arket	Steadi	ly Fluctuate se up	No change	Fluctuate down	Steadily decrease	Explanation and factors			
			Overall marke	et (OEM a	nd afterma	arket comb	ined)			
Within the	United State	es 🗌								
Outside the	United Stat	tes								
	OEM purchases									
Within the	United State	es 🗌								
Outside the	United Stat	tes								
				Aftermar	ket purchas	ses				
Within the	United State	es 🗌								
Outside the	United Stat	tes								
IV-16.	No	Yes I	f yes, please of truck and but the truck and but	describe a	and quantif	y if possibl	ess cycles, either during the			
	No	Yes I	f yes, please (describe,	including a	ny changes	s since January 1, 2021.			
IV-17. <u>Conditions of competition</u> Is the truck and bus tires market subject to conditions of competition distinctive to truck and bus tires other than the business cycles described in the previous question? If yes, describe.										
	No	Yes I	f yes, please (describe,	including a	ny changes	s since January 1, 2021.			

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IV-18. Supply constraints.-- Has your firm refused, declined, or been unable to supply truck and bus tires at any time between January 1, 2021 and October 17, 2023, and since the petition was filed on October 17, 2023 (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.)?

Period	No	Yes	If yes, please describe, including the reason, timing, and duration of the constraint.
2021			
2022			
January 1- October 17, 2023			
Since October 17, 2023			

IV-19. Raw materials.-- Have truck and bus tires 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 truck and bus tires.

IV-20. Market categories.—

(a) In your view, is the U.S. truck and bus tires market divided into categories (e.g., Best/Better/Good; Tier 1/Tier 2/Tier 3; Flagship/Secondary/Mass-market)?

No	If no, please skip to question IV-21
Yes	If yes, please describe each tier/category and identify the producers and brands that belong to in each category in the table below. Five potential tiers/categories are provided for your convenience; only fill out the number of tiers/categories that you perceive there to be in the market.

	Tier/categories	Producers	Brands
1.			
2.			
3.			
4.			
5.			

Tier/	If yes, please describe the characteristics of the tires and methods of sales and services in the tier/category and how this differs from the tiers above and/or below the tier/category.
1.	
2.	
3.	
4.	
5.	

(b) Please report the share of your firm's sales of domestically produced truck and bus tires for each tier. Five potential tiers are provided for your convenience; only fill out the number of tiers that you perceive there to be in the market.

Tiers	Share of your firm's 2023 sales to OEMs	Share of your firm's 2023 sales to the aftermarket
Tier 1	%	%
Tier 2	%	%
Tier 3	%	%
Tier 4	%	%
Tier 5	%	%
Total (should sum to 100.0%)	%	%

No	Yes		If yes, please explain which tiers, and why your firm's sales are concentrated in this/these tier(s).					
	as your fir anuary 1, 2		d bus tires shifte	ed between tiers/categories since				
	T							
No	Yes	If yes, please descr	ibe and quantif	y if possible.				
No	Yes	If yes, please descr	ibe and quantif	y if possible.				
(e) Do	truck and	bus tires in the higher as truck and bus tir	est/best tier hades in the lowest,	ve the same physical characteristics and /mass market tier?				
(e) Do	truck and	bus tires in the higher as truck and bus tir	est/best tier ha	ve the same physical characteristics and				

What criteria (other than quality) are used to delineate market tiers?

(g)

IV-21.	Branding.—
--------	------------

(a) How competitive in terms of quality and price are private-label tires with their namebrand counterparts?

Item	Very competitive	Somewhat competitive	Not competitive	Explanation and factors
Price				
Quality				

(b) Does your firm sell private label and branded truck and bus tires with the same specifications at different prices?

No	Yes	If yes, please explain and estimate price differences.

IV-22. Interchangeability.—

a) How often are truck and bus tires produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

Please indicate A, F, S, N, or 0 in the table below:

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

0 = no familiarity with products from a specified country-pair

Country-pair	Thailand	Other countries		
United States				
Thailand				
For any country-pair producing truck and bus tires which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude the interchangeable use of truck and bus tires produced in the countries:				

b) Does the interchangeability of truck and bus tires from the United States and Thailand differ between Thai truck and bus tires produced by Bridgestone, Prinx Chengshan, and other Thai producers?

No	Yes	If yes, please report differences and specify which of the three sources are more or less interchangeable.

IV-23. Factors other than price.—

a) How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between truck and bus tires produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

	ountry-pa	air	Thailand	Other countries
United State	tes			
Thailand				
factor in yo	our firm's ctors oth	purchases	of truck and bus tires, ident	always or frequently a significant ify the country-pair and the sor disadvantages imparted by
technical between producei	al suppor n Thai tru ers?	t, etc.) of t uck and bus	ruck and bus tires from the Us tires produced by Bridgesto	nsportation network, product range Jnited States and Thailand differ ne, Prinx Chengshan, and other Tha
	lo	Yes		nces and specify which of the three is are different.
N			Source	s are different.
N			Source	s are different.
Role of section changes in the	hese tari	ffs, have ar	d the tariffs on Chinese-origin	n products under section 301, or stires market in the United States, ly, and/or demand, since January 1,
Role of section changes in the including any 2021?	hese tari	ffs, have ar	d the tariffs on Chinese-origin	n products under section 301, or s tires market in the United States,

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

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

IV-26.	Com	petition	from	im	ports

(a) <u>Lost revenue</u>.--Since January 1, 2021: To avoid losing sales to competitors selling truck and bus tires from Thailand, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales</u>.--Since January 1, 2021: Did your firm lose sales of truck and bus tires to imports of this product from Thailand?

No	Yes

IV-27.	Other explanationsIf your firm would like to further explain a response to a question in Part
	IV for which a narrative response box was not provided, please note the question number and
	the explanation in the space provided below. Please also use this space to highlight any issues
	your firm had in providing the data in this section.

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://usitc.gov/reports/active import injury questionnaires.

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

• <u>Upload via Secure Drop Box</u>.—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: https://dropbox.usitc.gov/oinv/ Pin: TIRES

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

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

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