

## LOST SALES AND LOST REVENUE SURVEY

### OVERHEAD DOOR COUNTERBALANCE TORSION SPRINGS FROM CHINA AND INDIA

This survey must be received by the Commission by **November 12, 2024**  
*See last page for instructions regarding how to file this questionnaire.*

The information called for in this survey is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning overhead door counterbalance torsion springs ("overhead door springs") from China and India (Inv. Nos. 701-TA-746-747 and 731-TA-1724-1725 (Preliminary)). The information requested in the survey is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)). Further information on this survey can be obtained from Tana von Kessler (202-205-2389, tana.vonkessler@usitc.gov).

Name of firm \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Website \_\_\_\_\_

Has your firm purchased overhead door springs from any source (domestic or foreign), or imported overhead door springs for internal consumption, at any time since January 1, 2021?

- ☐ **NO** (Sign the certification below and promptly return **only** this page of the survey to the Commission)  
☐ **YES** (Complete all parts of the survey, and return the entire survey to the Commission)

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

#### CERTIFICATION

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

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

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

**GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to a petition filed on October 29, 2024, by IDC Group, Inc., Minneapolis, Minnesota; Iowa Spring Manufacturing, Inc., Adel, Iowa; and Service Spring Corp., Maumee, Ohio. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Pertinent information to this proceeding is available at:

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

Other case information: <https://ids.usitc.gov/case/8234/investigation/8655>

**Overhead door springs** covered by this proceeding are helically wound, overhead door counterbalance torsion steel springs ("overhead door counterbalance torsion springs"). Overhead door counterbalance torsion springs are helical steel springs with tightly wound coils that store and release mechanical energy by winding and unwinding along the spring's axis by an angle, using torque to create a lifting force in the counterbalance assembly typically used to raise and lower overhead doors, including garage doors, industrial rolling doors, warehouse doors, trailer doors, and other overhead doors, gates, grates, or similar devices. The merchandise covered by these investigations covers all overhead door counterbalance torsion springs with a coil inside diameter of 15.8 millimeters ("mm") or more but not exceeding 304.8 mm (measured across the diameter from inner edge to inner edge); a wire diameter of 2.5 mm to 20.4 mm; a length of 127 mm or more; and regardless of the following characteristics:

- Wire type (including, but not limited to, oil-tempered wire, hard-drawn wire, music wire, galvanized or other coated wire);
- Wire cross-sectional shape (e.g., round, square, or other shapes);
- Coating (e.g., uncoated, oil- or water-based coatings, lubricant coatings, zinc, aluminum, zinc-aluminum, paint or plastic coating, etc.);
- Winding orientation (left-hand or right-hand wind direction);
- End type (including, but not limited to, looped, double looped, clipped, long length, mini warehouse, Barcol, Crawford, Kinnear, Wagner, rolling steel or barrel ends); and
- Whether the overhead door counterbalance torsion springs are fitted with hardware, including but not limited to fasteners, clips, and cones (winding or stationary cones).

For purposes of the diameters referenced above, where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above.

The steel torsion springs included in the scope of these investigations are produced from steel in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less, by weight.

Subject merchandise includes cones or other fittings attached to or entered with the subject overhead door counterbalance torsion springs. Subject merchandise also includes all subject overhead door counterbalance torsion springs entered as a part of overhead door kits, overhead door mounting or assembly kits, or as a part of a spring-operated motor assembly or as a part of a spring winder assembly kit for torsion springs. When counterbalance torsion springs are entered as a part of such kits, only the counterbalance spring and cones attached to or entered with the spring are within scope.

Subject merchandise also includes overhead door counterbalance torsion springs that have been further processed in a third country, including but not limited to cutting to length, attachment of hardware, cones or end-fittings, inclusion in garage door kits or garage door mounting or assembly kits, or any other processing that would remove the merchandise from the scope of these orders if performed in the country of manufacture of the in-scope overhead door counterbalance torsion springs.

All products that meet the written physical description are within the scope of these investigations unless specifically excluded. The following products are specifically excluded from the scope of these investigations:

- Leaf springs (slender arc-shaped length of spring steel of a rectangular cross-section);
- Disc springs (conical springs consisting of a convex disc with the outer edge working against the center of the disc);
- Extension springs (close-wound round helical wire springs that store and release energy by resisting the external pulling forces applied to the spring's ends in the direction of its length);
- Compression springs (helical coiled springs with open wound active coils (such open winding is also known as pitch) that are designed to compress under load or force); and
- Spiral springs (torsion springs wound as concentric spirals such as a clock spring or mainspring).

Overhead door springs are currently imported under statistical reporting numbers 7320.20.5020, 7320.20.5045 and 7320.20.5060 of the Harmonized Tariff Schedule of the United States (HTSUS). They may also be classified under HTSUS subheading 8412.90.9085 if entered as parts of spring-operated motors. They may also be classified in HTSUS subheading 8412.80.1000 (spring-operated motors) if entered as part of a spring counterweight assembly for an overhead door. They may also be classified in HTSUS subheading 7308.90.9590, a basket category that includes metal garage doors entered with mounting accessories or assemblies. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

**Reporting of information.**-- If information is not readily available from your records, provide carefully prepared estimates.

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

**Release of information.**--The information provided by your firm in response to this survey, 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. Please also retain a copy of the final document that you submit.

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

Name	
Title	
Email	
Telephone	

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

**PURCHASE INFORMATION**

1. **Purchases and imports.**— Report separately your firm's domestic purchases and imports of overhead door springs.

**"Purchase"**— Purchase from a U.S. entity, such as a U.S. producer, a U.S. importer, or other U.S. firm.

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

Item	2021	2022	2023	January-June 2024
	Quantity (in pounds)			
<b>Purchases of overhead door springs produced in—</b> United States				
China				
India				
All other countries <sup>1</sup>				
Sources unknown <sup>2</sup>				
Total purchases	0	0	0	0
<b>Imports of overhead door springs from—</b> China				
India				
All other countries <sup>1</sup>				
Total imports <sup>3</sup>	0	0	0	0
<sup>1</sup> Please identify these countries: <sup>2</sup> Please indicate the firm(s) from which you purchased this merchandise: <sup>3</sup> If your firm imported overhead door springs at any time since January 1, 2021, please also complete and return a U.S. importers' questionnaire in this proceeding.				

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

Select one box per row.

[illegible]

**3. Purchasing subject imports rather than domestic products.—**

- (a) Since January 1, 2021, did your firm import and/or purchase imports of overhead door springs from China and India instead of purchasing U.S.-produced overhead door springs? Respond for each subject country.

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

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

<b>Source</b>	<b>Yes</b>	<b>No</b>
China	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>

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

<b>Source</b>	<b>Yes</b>	<b>If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 1, 2021 (in pounds)</b>	<b>No</b>	<b>If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product</b>
China	<input type="checkbox"/>		<input type="checkbox"/>	
India	<input type="checkbox"/>		<input type="checkbox"/>	
If the quantity reported above exceeds the total quantity reported in Question 1, please explain.				

**4. U.S. producers and import competition.—**

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

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

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

<b>Source</b>	<b>Estimated reduction in U.S. prices (percent)</b>	<b>Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors</b>
China	%	
India	%	



5. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase overhead door springs.

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

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

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

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

Law firm:	
Lead attorney(s):	

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

Hours	Dollars

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

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

## HOW TO FILE YOUR SURVEY RESPONSE

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

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

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

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

**Pin:** **DOOR**

**Phase:** **Preliminary**

- **E-mail.**— *E-mail the MS Word questionnaire to [tana.vonkessler@usitc.gov](mailto:tana.vonkessler@usitc.gov); include a PDF copy of the complete questionnaire with a signature on the first page. Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure submission portal and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm's nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.*

**If your firm did not purchase this product,** please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission's secure submission portal or email.