

U.S. PRODUCERS' QUESTIONNAIRE

LARGE DIAMETER WELDED PIPE FROM CANADA, CHINA, GREECE, INDIA, SOUTH KOREA, AND TURKEY

This questionnaire must be received by the Commission by **December 9, 2024**.
See last page for instructions regarding how to file this questionnaire.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its review of the countervailing and antidumping duty orders concerning large diameter welded pipe from Canada, China, Greece, India, South Korea, and Turkey (Inv. Nos. 701-TA-593-596 and 731-TA-1401-1406 (Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm _____
Address _____
City _____ State _____ Zip Code _____
Website _____

Has your firm produced large diameter welded pipe (as defined on the next page) at any time since January 1, 2018?

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

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

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

CERTIFICATION

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

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background.--On March 6, 2019, the Department of Commerce ("Commerce") issued countervailing and antidumping duty orders on imports of large diameter welded pipe from China and India. On May 2, 2019, Commerce issued countervailing duty orders on imports of large diameter welded pipe from South Korea and Turkey and antidumping duty orders on imports of large diameter welded pipe from Canada, Greece, South Korea, and Turkey. On February 1, 2024, the Commission instituted a review pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the orders will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the relevant order. 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: [Investigation | USITC Investigations](#).

Large Diameter Welded Pipe covered by these orders is welded carbon and alloy steel pipe (other than stainless steel pipe), more than 406.4 mm (16 inches) in nominal outside diameter (large diameter welded pipe), regardless of wall thickness, length, surface finish, grade, end finish, or stenciling. Large diameter welded pipe may be used to transport oil, gas, slurry, steam, or other fluids, liquids, or gases. It may also be used for structural purposes, including, but not limited to, piling. Specifically, not included is large diameter welded pipe produced only to specifications of the American Water Works Association (AWWA) for water and sewage pipe.

Large diameter welded pipe used to transport oil, gas, or natural gas liquids is normally produced to the American Petroleum Institute (API) specification 5L. Large diameter welded pipe may also be produced to American Society for Testing and Materials (ASTM) standards A500, A252, or A53, or other relevant domestic specifications, grades and/or standards. Large diameter welded pipe can be produced to comparable foreign specifications, grades and/or standards or to proprietary specifications, grades and/or standards, or can be non-graded material. All pipe meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise also includes large diameter welded pipe that has been further processed in a third country, including but not limited to coating, painting, notching, beveling, cutting, punching, welding, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the in-scope large diameter welded pipe.

Excluded from the scope are any products covered by the existing antidumping duty order on welded line pipe from the Republic of Korea and Turkey.

See Welded Line Pipe from the Republic of Korea and the Republic of Turkey: Antidumping Duty Orders, 80 FR 75056 (December 1, 2015).

The large diameter welded pipe that is subject to this proceeding is currently classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) under statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, 7305.19.5000, 7305.31.4000, 7305.31.6090, 7305.39.1000 and 7305.39.5000. While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this order is dispositive.

Reporting of information.--If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates. If your firm is completing more than one questionnaire in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions in the questionnaires.

LDW line pipe covered by these orders is LDW pipe (more than 406.4 mm (16 inches) in nominal outside diameter) used for oil and gas pipelines and normally produced to the API specification 5L. LDW line pipe can also be produced to comparable domestic or foreign specifications or to proprietary grades. The large diameter welded line pipe that is subject to this proceeding is currently classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) under statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000.

LDW structural pipe covered by these orders is LDW pipe (more than 406.4 mm (16 inches) in nominal outside diameter) normally produced to ASTM standards A500, A252, or A53. LDW structural pipe can also be produced to comparable domestic or foreign specifications or to proprietary grades, or be non-graded material. The large diameter welded structural pipe that is subject to this proceeding is currently classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) under statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000 and 7305.39.5000.

LDW pipe = LDW line pipe + LDW structural pipe

Separate domestic like products: In the original investigations concerning LDW pipe, the Commission defined two separate domestic like products: "LDW line pipe" and "LDW structural pipe." Accordingly, the data requested in this questionnaire have been split between these two products, industries, and markets.

- Line pipe producers = Fill out sections I, II, III, V, VI, and VIII
- Structural pipe producers = Fill out sections I, II, IV, V, VII, and VIII

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

Verification.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all of your 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.

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

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

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 55 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

- I-2a. **Establishments covered.**--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.**

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

Establishments Covered ¹	LDW line pipe	LDW structural pipe	City, State	Zip (5 digit)	Description
1	<input type="checkbox"/>	<input type="checkbox"/>			
2	<input type="checkbox"/>	<input type="checkbox"/>			
3	<input type="checkbox"/>	<input type="checkbox"/>			
4	<input type="checkbox"/>	<input type="checkbox"/>			
5	<input type="checkbox"/>	<input type="checkbox"/>			
6	<input type="checkbox"/>	<input type="checkbox"/>			
7	<input type="checkbox"/>	<input type="checkbox"/>			
8	<input type="checkbox"/>	<input type="checkbox"/>			
9	<input type="checkbox"/>	<input type="checkbox"/>			
10	<input type="checkbox"/>	<input type="checkbox"/>			

¹ Additional discussion on establishments consolidated in this questionnaire: _____

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

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

Law firm:	
Lead attorney(s):	

I-3a. **LDW line pipe: Position regarding continuation of order.**--Does your firm support or oppose continuation of the following antidumping and/or countervailing duty orders currently in place for LDW line pipe?

Country	Order type	Support	Oppose	Take no position
Canada	Antidumping duty (A-122-863)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Antidumping duty (A-570-077)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Countervailing duty (C-570-078)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Greece	Antidumping duty (A-484-803)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Antidumping duty (A-533-881)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Countervailing duty (C-533-882)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Antidumping duty (A-580-897)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Countervailing duty (C-580-898)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Antidumping duty (A-489-833)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Countervailing duty (C-489-834)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-3b. **LDW structural pipe: Position regarding continuation of order.**--Does your firm support or oppose continuation of the following antidumping and/or countervailing duty orders currently in place for LDW structural pipe?

Country	Order type	Support	Oppose	Take no position
Canada	Antidumping duty (A-122-863)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Antidumping duty (A-570-077)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Countervailing duty (C-570-078)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Antidumping duty (A-580-897)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Countervailing duty (C-580-898)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Antidumping duty (A-489-833)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Countervailing duty (C-489-834)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

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

Firm name	Country	Extent of ownership (percent)

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

I-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing LDW pipe into the United States or that are engaged in exporting LDW pipe to the United States?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation	LDW line pipe	LDW structural pipe
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>

I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of LDW pipe?

☐ No ☐ Yes--List the following information.

[illegible]

PART II.--TRADE AND RELATED INFORMATION (General Information/LDW Pipe)

Production using same machinery.--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce LDW line and/or structural pipe, 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 *not* 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 LDW pipe capacity" – The level of production of LDW line and/or structural pipe 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 LDW line and/or structural pipe based on the actual product mix experienced over the period.

Takes into account	Installed overall capacity	Practical overall capacity	Practical LDW pipe 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 LDW line and/or structural pipe	No	No	Yes

“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.

LDW Pipe Shipments and inventory data.--Report your firm's uses (shipment or storage) of domestically produced LDW line and/or structural 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 net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

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

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

“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.

LDW Pipe Employment data.--Report your firm's employment-related data related to the production of LDW line and/or structural pipe 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 September periods, calculate similarly and divide by 9.

"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.

PART III.--TRADE AND RELATED INFORMATION (LDW line pipe)

LDW line pipe

Further information on this part of the questionnaire can be obtained from **Lawrence Jones (202-205-3358, Lawrence.jones@usitc.gov)**. **Supply all data requested on a calendar-year basis.**

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

Name	
Title	
Email	
Telephone	

III-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of LDW line pipe since January 1, 2018.

<i>Check as many as appropriate.</i>	<i>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</i>
<input type="checkbox"/> Plant openings	
<input type="checkbox"/> Plant closings	
<input type="checkbox"/> Prolonged shutdowns	
<input type="checkbox"/> Production curtailments	
<input type="checkbox"/> Relocations	
<input type="checkbox"/> Expansions	
<input type="checkbox"/> Acquisitions	
<input type="checkbox"/> Consolidations	
<input type="checkbox"/> Weather-related or force majeure events	
<input type="checkbox"/> Other (e.g., revised labor agreements, technology)	

- III-2b. **COVID-19 pandemic.**—Has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, production, employment, and shipments relating to LDW line pipe? 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 large diameter welded pipe.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-2c. **Anticipated changes in operations.**—Does your firm anticipate any changes in the character of its operations or organization relating to the production of LDW line pipe in the future?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

III-3a. **LDW line Pipe: Production using same machinery.—Continued****LDW line pipe**

Item	Quantity (in short tons)							
	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Capacity measures:								
Installed overall capacity ¹								
Practical overall capacity ^{1 2}								
Practical LDW line pipe capacity ^{3 4}	0	0	0	0	0	0	0	0
Production of:								
LDW line pipe ^{3 4}	0	0	0	0	0	0	0	0
LDW structural pipe ⁵								
Other products ⁶								
Subtotal, all out-of-scope products	0	0	0	0	0	0	0	0
Total production using same machinery or workers	0	0	0	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 III-6.

⁴ Data reported for practical LDW line pipe capacity should be greater than the data reported for production of LDW line pipe 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 LDW line pipe then "practical overall" and "practical LDW line pipe" capacity measures should be equal to each other.

⁵ Only report LDW structural pipe that is produced on the same equipment, machinery, or employees as used to produce LDW line pipe (i.e., not necessarily all LDW structural pipe production).

⁶ Please identify these products: _____.

- III-3b. **Operating parameters.**--The **practical** overall capacity reported in III-3a is based on the following operating parameters:

Hours per week	Weeks per year

- III-3c. **Capacity calculations.**--Please describe the methodology used to calculate **installed** and **practical** overall capacities reported in III-3a, and explain any changes in reported capacities.

--

- III-3d. **Practical overall production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's practical overall capacity over the period reported in question III-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)
<input type="checkbox"/>	Production bottlenecks	
<input type="checkbox"/>	Existing labor force	
<input type="checkbox"/>	Supply of material inputs	
<input type="checkbox"/>	Fuel or energy	
<input type="checkbox"/>	Storage capacity	
<input type="checkbox"/>	Logistics/transportation	
<input type="checkbox"/>	Other constraints (list the specific constraints in the description field)	

III-3e. **Reaching installed overall capacity.**--Please describe and quantify the amount of time it would take and the additional actions that would be needed for your firm to be able to fully utilize the reported installed overall capacity reported in III-3a.

Hiring additional workers for existing shifts

Increasing the number of shifts

Bringing online existing unused equipment

Other actions

III-3f. **Excess installed overall capacity.**--To the extent that your company is reporting excess installed overall capacity, please report, with specificity: (1) which machines or equipment (or other elements of production) would need to be brought back into production for your plant to operate at full capacity, and (2) the specific dates on which such machines or equipment were last used by your plant to produce LDW line pipe.

III-4. **Product shifting.**—

(a) Is your firm able to switch production (capacity) between LDW line pipe and other products using the same equipment and/or labor?

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
<input type="checkbox"/>	<input type="checkbox"/>	

- (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.

--

- (c) **Facility details: LDW line pipe.**--Please provide detail descriptions of the number, location, and type (LSAW, HSAW, ERW, et cetera) of the mills included in question III-3a. Please also indicate the lower bound and upper bound diameter size of LDW line pipe each mill is capable of producing.

--

III-5. **Capacity checklist.**--Please check that the capacity numbers reported in question III-3a follow the Commission's relevant definitions for capacity.

Item	√ if Yes
Are all three capacity measures reported based on <u>currently installed machinery and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	<input type="checkbox"/>
Are practical overall capacity and practical LDW line pipe 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)?	<input type="checkbox"/>
Are practical overall capacity and practical LDW line pipe capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical LDW line pipe capacity measures account for <u>normal downtime, maintenance, repair and clean-up</u> activities?	<input type="checkbox"/>
Does the difference between practical overall capacity and practical LDW line pipe capacity equal the portion of practical overall capacity that is dedicated to the production of out-of-scope products?	<input type="checkbox"/>

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.

III-6. Production, shipment, and inventory data (LDW line pipe). –Continued

LDW line pipe

Quantity (in short tons) and value (in \$1,000)								
Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Practical LDW line pipe capacity¹ (quantity) (A)								
Beginning-of-period inventories (quantity) (B)								
Production (C)								
U.S. shipments:								
Commercial shipments:								
quantity (D)								
value (E)								
Internal consumption:²								
quantity (F)								
value (G) ²								
Transfers to related firms:²								
quantity (H)								
value (I) ²								
Export shipments:³								
quantity (J)								
value (K)								
End-of-period inventories:								
quantity (L)								

¹ Report your firm's practical LDW line pipe capacity consistent with the definitions and instructions included in question III-3a.

² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.

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

III-6. **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 L) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and, also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0	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: _____.								

III-7. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW line pipe by channel of distribution during the specified periods.

LDW line pipe

Quantity (in short tons)								
Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
U.S. shipments: to Distributors (M)								
to Oil and gas end users (N)								
To Other end users (O)								

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

Reconciliation item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
M + N + O – D – F – H = zero ("0"), if not revise.	0	0	0	0	0	0	0	0

III-8a. **U.S. shipments by grade and steel type (LDW line pipe).**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW line pipe by grade and steel type during the specified periods.

LDW line pipe

Quantity (in short tons), value (in \$1,000)		
Item	Calendar year	January-September
	2023	2024
U.S. shipments:		
API-5/Grade B:		
Quantity (P)		
Value (Q)		
X-69 and below:		
Quantity (R)		
Value (S)		
X-70 to X-79:		
Quantity (T)		
Value (U)		
X-80 and above:		
Quantity (V)		
Value (W)		
All other grades:¹		
Quantity (X)		
Value (Y)		
¹ Please identify these products: _____.		

RECONCILIATION OF SHIPMENTS.-- Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines P through Y) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year	January-September
	2023	2024
Quantity: $P + R + T + V + X - D - F - H = \text{zero ("0")}$, if not revise.	0	0
Value: $Q + S + U + W + Y - E - G - I = \text{zero ("0")}$, if not revise.	0	0

III-8b. **U.S. shipments by outer diameter size (LDW line pipe).**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW line pipe by diameter size during the specified periods.

LDW line pipe

Quantity (in short tons), value (in \$1,000)		
Item	Calendar year	January-September
	2023	2024
U.S. shipments:		
>16 in OD <= 24 inch OD:		
Quantity (Z)		
Value (AA)		
>24 in OD <= 48 inch OD:		
Quantity (AB)		
Value (AC)		
>48 in OD:		
Quantity (AD)		
Value (AE)		

RECONCILIATION OF SHIPMENTS.-- Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines Z through AE) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year	January-September
	2023	2024
Quantity: $Z + AB + AD - D - F - H = \text{zero ("0")}$, if not revise.	0	0
Value: $AA + AC + AE - E - G - I = \text{zero ("0")}$, if not revise.	0	0

III-8c. **U.S. shipments by production method (LDW line pipe).**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW line pipe, by production method during the specified periods.

LDW line pipe

Quantity (in short tons), value (in \$1,000)		
Item	Calendar year	January-September
	2023	2024
U.S. production:		
HSAW:		
Quantity (AF)		
Value (AG)		
LSAW		
Quantity (AH)		
Value (AI)		
ERW:		
Quantity (AJ)		
Value (AK)		

RECONCILIATION OF SHIPMENTS.-- Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines Z through AE) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year	January-September
	2023	2024
Quantity: $AF + AH + AJ - D - F - H = \text{zero ("0")}$, if not revise.	0	0
Value: $AG + AI + AK - E - G - I = \text{zero ("0")}$, if not revise.	0	0

- III-9. **Employment data.**--Report your firm's employment-related data related to the production of LDW line pipe in your U.S. establishments and provide an explanation for any trends in these data.

LDW line pipe

Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Employment data: Average number of PRWs (<i>number</i>) for line pipe								
Hours worked by PRWs (<i>1,000 hours</i>)								
Wages paid to PRWs (<i>\$1,000</i>)								

Note: PRWs may be dedicated to the production of this product or may engage in the production of other products.

Explanation of trends:

--

- III-10. **Transfers to related firms.**--If your firm reported transfers to related firms in question III-6, 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.

--

- III-11. **Imports.**--Since January 1, 2018, has your firm imported LDW line pipe?

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

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	If yes-- <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

III-12. **Purchases.**--Has your firm purchased LDW line pipe produced in the United States or in other countries since January 1, 2018? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire).

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

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

No	Yes	If yes-- Report such purchases in the table below and explain the reasons for your firms' purchases:
<input type="checkbox"/>	<input type="checkbox"/>	

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

South Korea, subject.—South Korea, subject merchandise includes in-scope LDW line pipe from all suppliers in South Korea except for >16" to 24" in nominal outside diameter LDW line pipe from Husteel and Hyundai.

South Korea, nonsubject.—South Korea, nonsubject merchandise is limited to LDW line pipe >16" to 24" in nominal outside diameter imported from Husteel and/or Hyundai.

Turkey, subject.—Turkey, subject merchandise includes only in-scope LWP line pipe >24" in nominal outside diameter, i.e., excluding >16" through to and including 24" in nominal outside diameter, imported from any supplier in Turkey.

Turkey, nonsubject.—Turkey, subject merchandise is limited to LDW line pipe >16" to 24" in nominal outside diameter imported from any supplier in Turkey.

LDW line pipe

Quantity (in short tons)								
Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Purchases from U.S. importers of LDW line pipe from— Canada								
China								
Greece								
India								
South Korea, subject								
Turkey, subject								
Subject sources	0	0	0	0	0	0	0	0
South Korea, nonsubject								
Turkey, nonsubject								
All other sources								
Subject sources ¹	0	0	0	0	0	0	0	0
Purchases from domestic producers²								
Purchases from other sources³								
Purchases from all sources	0	0	0	0	0	0	0	0

¹ Please list the name of the nonsubject importer(s) from which your firm purchased this product: ____.

² Please list the name of the U.S. producer(s) from which your firm purchased this product: ____.

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

Purchases of subject imports

[illegible]

III-13. **Purchases of imports from subject sources (LDW line pipe).**—Continued.

RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES.--Please ensure that the quantities reported for your firm's 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.

Reconciliation	Calendar year						January-September	
	2018	2019	2020	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	0	0	0

III-14. **Toll production.**--Since January 1, 2018, has your firm been involved in a toll agreement regarding the production of LDW line pipe?

"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	
<input type="checkbox"/>	<input type="checkbox"/>	If yes—Please complete the table below

Does your firm act as the toller or tollee in this arrangement?	Toller: <input type="checkbox"/>	Tollee: <input type="checkbox"/>
Report the share of your firm's production of LDW line pipe that was 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:		

III-15. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce LDW line pipe in and/or admit LDW line pipe 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	Yes	If yes-- Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

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

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

For questions III-16 and III-17, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

LDW line pipe

- III-16. **Effect of order(s).**--Describe the significance of the existing countervailing duty or antidumping duty order covering imports of LDW line pipe from Canada, China, Greece, India, South Korea, or Turkey in terms of its effect on your firm's capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the order(s).

--

- III-17. **Likely impact of revocation.**--Would your firm anticipate any changes in the character of its operations or organization, including its capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of LDW line pipe in the future if the countervailing duty or antidumping duty orders on LDW line pipe from Canada, China, Greece, India, South Korea, or Turkey were to be revoked?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-18. **Other explanations:**--If your firm would like to explain further 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 IV.--TRADE AND RELATED INFORMATION (LDW Structural Pipe)

Further information on this part of the questionnaire can be obtained from **Lawrence Jones (202-205-3358, Lawrence.jones@usitc.gov)**. Supply all data requested on a calendar-year basis.

LDW structural pipe

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

Name	
Title	
Email	
Telephone	

- IV-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of LDW structural pipe since January 1, 2018.

<i>Check as many as appropriate.</i>		<i>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</i>
<input type="checkbox"/>	Plant openings	
<input type="checkbox"/>	Plant closings	
<input type="checkbox"/>	Prolonged shutdowns	
<input type="checkbox"/>	Production curtailments	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Weather-related or force majeure events	
<input type="checkbox"/>	Other (e.g., revised labor agreements, technology)	

- IV-2b. **COVID-19 pandemic.**—Has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, production, employment, and shipments relating to LDW structural pipe? 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 LDW structural pipe.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-2c. **Anticipated changes in operations.**—Does your firm anticipate any changes in the character of its operations or organization relating to the production of LDW structural pipe in the future?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

Quantity (in short tons)								
Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Capacity measures:								
Installed overall capacity ¹								
Practical overall capacity ^{1 2}								
Practical LDW structural pipe capacity ^{3 4}	0	0	0	0	0	0	0	0
Production of:								
LDW structural pipe ^{3 4}	0	0	0	0	0	0	0	0
LDW line pipe ⁵								
Other products ⁶								
Subtotal, all products other than LDW structural pipe	0	0	0	0	0	0	0	0
Total production using same machinery or workers	0	0	0	0	0	0	0	0
<p>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.</p> <p>² Please provide details in your response to the question on capacity constraints in question IV-3d below that explain the differences reported between "installed" overall capacity and "practical" overall capacity.</p> <p>³ Data for this indicator will populate here once reported below in question IV-6.</p> <p>⁴ Data reported for practical LDW structural pipe capacity should be greater than the data reported for production of LDW structural pipe 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 LDW structural pipe then "practical overall" and "practical LDW structural pipe" capacity measures should be equal to each other.</p> <p>⁵ Only report LDW line pipe that is produced on the same equipment, machinery, or employees as used to produce LDW structural pipe (i.e., not necessarily all LDW line pipe production).</p> <p>⁶ Please identify these products: _____.</p>								

IV-3b. **Operating parameters.**--The *practical* overall capacity reported in IV-3a is based on the following operating parameters:

Hours per week	Weeks per year

IV-3c. **Capacity calculations.**--Please describe the methodology used to calculate *installed* and *practical* overall capacities reported in IV-3a, and explain any changes in reported capacities.

--

IV-3d. **Practical overall production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's practical overall capacity over the period reported in question IV-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)
<input type="checkbox"/>	Production bottlenecks	
<input type="checkbox"/>	Existing labor force	
<input type="checkbox"/>	Supply of material inputs	
<input type="checkbox"/>	Fuel or energy	
<input type="checkbox"/>	Storage capacity	
<input type="checkbox"/>	Logistics/transportation	
<input type="checkbox"/>	Other constraints (list the specific constraints in the description field)	

- IV-3e. **Reaching installed overall capacity.**--Please describe and quantify the amount of time it would take and the additional actions that would be needed for your firm to be able to fully utilize the reported installed overall capacity reported in IV-3a.

Hiring additional workers for existing shifts

Increasing the number of shifts

Bringing online existing unused equipment

Other actions

- IV-3f. **Excess installed overall capacity.**--To the extent that your company is reporting excess installed overall capacity, please report, with specificity: (1) which machines or equipment (or other elements of production) would need to be brought back into production for your plant to operate at full capacity, and (2) the specific dates on which such machines or equipment were last used by your plant to produce LDW structural pipe.

IV-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between LDW structural pipe and other products using the same equipment and/or labor?

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
<input type="checkbox"/>	<input type="checkbox"/>	

- (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.

- (c) **Facility details: LDW line pipe.**--Please provide detail descriptions of the number, location, and type (LSAW, HSAW, ERW, et cetera) of the mills included in question II-3a. Please also indicate the lower bound and upper bound diameter size of LDW line pipe each mill is capable of producing.

IV-5. **Capacity checklist.**--Please check that the capacity numbers reported in question IV-3a follow the Commission's relevant definitions for capacity.

Item	✓ if Yes
Are all three capacity measures reported based on <u>currently installed machinery and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	<input type="checkbox"/>
Are practical overall capacity and practical LDW structural pipe 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)?	<input type="checkbox"/>
Are practical overall capacity and practical LDW structural pipe capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical LDW structural pipe capacity measures account for <u>normal downtime, maintenance, repair and clean-up</u> activities?	<input type="checkbox"/>
Does the difference between practical overall capacity and practical LDW structural pipe capacity equal the portion of practical overall capacity that is dedicated to the production of out-of-scope products?	<input type="checkbox"/>

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.

IV-6. Production, shipment, and inventory data (LDW Structural Pipe). –Continued**LDW structural pipe**

Quantity (<i>in short tons</i>) and value (<i>in \$1,000</i>)								
Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Practical LDW structural pipe capacity¹ (<i>quantity</i>) (A)								
Beginning-of-period inventories (<i>quantity</i>) (B)								
Production (C)								
U.S. shipments:								
Commercial shipments:								
<i>quantity</i> (D)								
<i>value</i> (E)								
Internal consumption:²								
<i>quantity</i> (F)								
<i>value</i> (G) ²								
Transfers to related firms:²								
<i>quantity</i> (H)								
<i>value</i> (I) ²								
Export shipments:³								
<i>quantity</i> (J)								
<i>value</i> (K)								
End-of-period inventories:								
<i>quantity</i> (L)								

¹ Report your firm's practical LDW structural pipe capacity consistent with the definitions and instructions included in question IV-3a.

² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.

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

IV-6. **Production, shipment, and inventory data (LDW Structural Pipe).--Continued**

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

Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0	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: _____.								

IV-7. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW structural pipe by channel of distribution during the specified periods.

LDW structural pipe

Quantity (in short tons)								
Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
U.S. shipments: to Distributors (M)								
to Construction end users (N)								
To Other end users (O)								

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

Reconciliation item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
M + N + O – D – F – H = zero ("0"), if not revise.	0	0	0	0	0	0	0	0

- IV-8a. **U.S. shipments by grade and steel type (LDW structural pipe).**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW structural pipe by grade and steel type during the specified periods.

LDW structural pipe

Quantity (in short tons), value (in \$1,000)		
Item	Calendar year	January-September
	2023	2024
U.S. shipments:		
ASTM A500:		
Quantity (P)		
Value (Q)		
ASTM A252:		
Quantity (R)		
Value (S)		
ASTM A53:		
Quantity (T)		
Value (U)		
All other grades:¹		
Quantity (V)		
Value (W)		
¹ Please identify these products: _____.		

RECONCILIATION OF SHIPMENTS.-- Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines P through W) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year	January-September
	2023	2024
Quantity: $P + R + T + V - D - F - H = \text{zero ("0")}$, if not revise.	0	0
Value: $Q + S + U + W - E - G - I = \text{zero ("0")}$, if not revise.	0	0

- IV-8b. **U.S. shipments by outer diameter size (LDW structural pipe).**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW structural pipe by diameter size during the specified periods.

LDW structural pipe

Quantity (in short tons), value (in \$1,000)		
Item	Calendar year	January-September
	2023	2024
U.S. shipments:		
>16 in OD <= 24 inch OD:		
Quantity (X)		
Value (Y)		
>24 in OD <= 48 inch OD:		
Quantity (Z)		
Value (AA)		
>48 in OD:		
Quantity (AB)		
Value (AC)		

RECONCILIATION OF SHIPMENTS.-- Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines X through AC) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year	January-September
	2023	2024
Quantity: $X + Z + AB - D - F - H = \text{zero ("0")}$, if not revise.	0	0
Value: $Y + AA + AC - E - G - I = \text{zero ("0")}$, if not revise.	0	0

IV-8c. **U.S. shipments by production method (LDW structural pipe).**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced LDW structural pipe by production method during the specified periods.

LDW structural pipe

Quantity (in short tons), value (in \$1,000)		
Item	Calendar year	January-September
	2023	2024
U.S. production:		
HSAW:		
Quantity (AF)		
Value (AG)		
LSAW		
Quantity (AH)		
Value (AI)		
ERW:		
Quantity (AJ)		
Value (AK)		

RECONCILIATION OF SHIPMENTS.-- Please ensure that the quantities and values reported for U.S. shipments in this question (i.e., lines Z through AE) in each time period equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year	January-September
	2023	2024
Quantity: $AF + AH + AJ - D - F - H = \text{zero ("0")}$, if not revise.	0	0
Value: $AG + AI + AK - E - G - I = \text{zero ("0")}$, if not revise.	0	0

- IV-9. **Employment data.**--Report your firm's employment-related data related to the production of LDW structural pipe in your U.S. establishments and provide an explanation for any trends in these data.

LDW structural pipe

Item	Calendar year						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Employment data: Average number of PRWs (<i>number</i>) for structural pipe								
Hours worked by PRWs (<i>1,000 hours</i>)								
Wages paid to PRWs (<i>\$1,000</i>)								

Note: PRWs may be dedicated to the production of this product or may engage in the production of other products.

Explanation of trends:

--

- IV-10. **Transfers to related firms.**--If your firm reported transfers to related firms in question IV-6, 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.

--

- IV-11. **Imports.**--Since January 1, 2018, has your firm imported LDW structural pipe?

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

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	If yes-- <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

IV-13. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of LDW structural pipe from Canada, China, South Korea, or Turkey at any time since January 1, 2018, report those purchases by the individual importer of record and subject source.

Purchases of subject imports

[illegible]

IV-13. **Purchases of imports from subject sources (LDW Structural Pipe).**—*Continued.*

RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES.—Please ensure that the quantities reported for your firm's 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.

Reconciliation	Calendar year						January-September	
	2018	2019	2020	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	0	0	0

IV-14. **Toll production.**—Since January 1, 2018, has your firm been involved in a toll agreement regarding the production of LDW structural pipe?

"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	
<input type="checkbox"/>	<input type="checkbox"/>	If yes—Please complete the table below

Does your firm act as the toller or tollee in this arrangement?	Toller: <input type="checkbox"/>	Tollee: <input type="checkbox"/>
Report the share of your firm's production of LDW structural pipe that was 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:		

IV-15. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce LDW structural pipe in and/or admit LDW structural pipe 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	Yes	If yes-- Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

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

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

For questions IV-16 and IV-17, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

LDW structural pipe

- IV-16. **Effect of order(s).**--Describe the significance of the existing countervailing duty or antidumping duty order covering imports of LDW structural pipe from Canada, China, South Korea, or Turkey in terms of its effect on your firm's capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the order(s).

--

- IV-17. **Likely impact of revocation.**--Would your firm anticipate any changes in the character of its operations or organization, including its capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of LDW structural pipe in the future if the countervailing duty or antidumping duty orders on LDW structural pipe from Canada, China, South Korea or Turkey, were to be revoked?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Other explanations:**--If your firm would like to explain further a response to a question in Part IV 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.

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PART V.--FINANCIAL INFORMATION (General information/LDW pipe)

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

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

Name	
Title	
Email	
Telephone	

- V-2. **Accounting system.**—Briefly describe your firm's financial accounting system.

- A.1. When does your firm's fiscal year end (month and day)? _____
If your firm's fiscal year changed since January 1, 2018, explain below:

- A.2. Note: Calendar-year data are preferred for the annual-year financial data in this section (i.e., in questions VI-1a, VI-3a, VI-4a, VII-1a, VII-3a, and VII-4a). 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.

☐ 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 large diameter welded pipe:

- B.2. Does your firm prepare profit/loss statements for large diameter welded pipe:

☐ Yes ☐ No

- B.3. Please indicate the type and frequency (if applicable) of financial statements prepared by your firm. Please check relevant items below.

Financial statements	Check all that apply	Frequency			
		Monthly	Quarterly	Semi-annually	Annually
Audited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unaudited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual reports	<input type="checkbox"/>				
SEC Forms 10-K / 10-Q	<input type="checkbox"/>				
SEC Form 20-F	<input type="checkbox"/>				
Other (specify): _____	<input type="checkbox"/>				

V-2. **Accounting system.**—Continued

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

Accounting basis	Check one
U.S. GAAP	<input type="checkbox"/>
IFRS	<input type="checkbox"/>
Tax – cash	<input type="checkbox"/>
Tax – accrual	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>

V-3. **Cost accounting system.**—Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

--

V-4. **Product listing.**—Please list the products your firm produces in the facilities in which it produces large diameter welded pipe, and provide the share of net sales accounted for by these products in 2023.

Products	Share of sales in 2023
LDW line pipe	%
LDW structural pipe	%
	%
	%
	%

V-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of LDWP from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?
☐ Yes--Continue to question V-6. ☐ No--Continue to question V-8.

- V-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of LDWP that your firm purchases from related suppliers and that are reflected in question VI-1a (LDW line pipe) and VII-1a (LDW structural pipe). For “Share of COGS for LDW line and structural pipe” please report this information by relevant input for 2023.

LDW line pipe

Input	Related supplier	Share of total COGS reported in VI-1a in 2023
		%
		%
		%
		%

LDW structural pipe

Input	Related supplier	Share of total COGS reported in VII-1a in 2023
		%
		%
		%
		%

- V-7a. **Valuation method used for inputs from related suppliers.**—Please indicate the purchase cost valuation method used for the inputs from related suppliers, as recorded in the company's own accounting system. If the basis differs by input, please check all that apply and explain further in the narrative box.

Purchase cost valuation method	Check all that apply
Related supplier's cost	<input type="checkbox"/>
Cost plus	<input type="checkbox"/>
Negotiated transfer price to approximate fair market value	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>
If the methods used differ by input or products (LDW line pipe and LDW structural pipe), please describe:	

- V-7b. **Valuation method used for inputs from related suppliers.**—Please confirm that the inputs purchased from related suppliers, as identified in V-6, were reported in VI-1a and VII-1a (financial results on LDW line pipe and structural pipe) in a manner consistent with the firm's accounting books and records.

Yes	No	If no—Provide an explanation and the valuation basis used for these inputs in question VI-1a and VII-1a.
<input type="checkbox"/>	<input type="checkbox"/>	

- V-8. **Cost assignment/allocation basis.**— Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for LDW line and/or structural pipe in the normal course of business and in the financial results reported in question VI-1a and VII-1a (e.g., actual costs, standard costs, percentage of COGS, percentage of sales, etc.).

Cost/expense	Assignment/allocation bases used for LDW line and/or structural pipe	
	In the normal course of business	In the financial results at VI-1a and VII-1a
Raw materials		
Direct labor		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		
If the assignment/allocation bases differ products (LDW line pipe and LDW structural pipe), please describe:		

- V-9. **Effects on financial performance of COVID-19.**—Has the COVID-19 pandemic, or any government actions taken to contain the spread of the COVID-19 virus, affected the financial performance of your firm's operations LDW line and/or structural pipe as reported in question VI-1a and VII-1a? In your response, please include the duration and timing of any impacts as they relate to your firm's financial performance.

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

DEFINITIONS (for more comprehensive information, see pages 3 above):

LDW line pipe covered by these orders is LDW pipe used for oil and gas pipelines and normally produced to the API specification 5L. LDW line pipe can also be produced to comparable domestic or foreign specifications or to proprietary grades.

LDW structural pipe covered by these orders is LDW pipe normally produced to ASTM standards A500, A252, or A53. LDW structural pipe can also be produced to comparable domestic or foreign specifications or to proprietary grades, or be non-graded material.

Part VI is specific to your firm's operations of LDW line pipe only. If your firm produced and sold both line pipe and structural pipe, please allocate your financial data to line pipe and structural pipe accordingly and report them in Parts VI and VII, respectively.

**IF YOUR FIRM PRODUCED AND SOLD ONLY LDW STRUCTURAL PIPE,
PROCEED DIRECTLY TO PART VII.**

PART VI.--FINANCIAL INFORMATION (LDW line pipe)

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

LDW LINE PIPE

VI-1a. **LDW line pipe: Operations on LDW line pipe.**—Report the revenue and related cost information requested below on the LDW line pipe 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.

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 large diameter welded pipe, as well as specific statements and worksheets) used to compile these data.

VI-1a. **LDW line pipe: Operations on LDW line pipe.**—Continued

Quantity (in short tons) and value (in \$1,000)						
Item	Years					
	2018	2019	2020	2021	2022	2023
Net sales quantities:						
Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales quantities	0	0	0	0	0	0
Net sales values:						
Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales values	0	0	0	0	0	0
Cost of goods sold (COGS):						
Raw materials						
Direct labor						
Other factory costs						
Total COGS	0	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0	0
SG&A expenses						
Operating income (loss)	0	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	0

VI-1a. **LDW line pipe: Operations on large diameter welded pipe.**—*Continued*

Quantity (<i>in short tons</i>) and value (<i>in \$1,000</i>)		
Item	January-September 2023	January-September 2024
Net sales quantities:		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales quantities	0	0
Net sales values:		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales values	0	0
Cost of goods sold (COGS):		
Raw materials		
Direct labor		
Other factory costs		
Total COGS	0	0
Gross profit or (loss)	0	0
SG&A expenses		
Operating income (loss)	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

- VI-1b. **LDW line pipe: Financial data reconciliation.**—Certain line items from question VI-1a, 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?

		<p>If no--If the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise.</p> <p>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).</p> <p>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.</p>
Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	

- VI-1c. **LDW line pipe: Raw materials.**—Please report the share of total raw material costs in 2023 (reported in VI-1a) for the following raw material inputs:

Input	Share of total raw material costs (percent)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Steel plate		<input type="checkbox"/>	<input type="checkbox"/>
Steel coils		<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs ¹		<input type="checkbox"/>	<input type="checkbox"/>
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:			

VI-1d. **LDW line pipe: Depreciation expense.**—Please report the amount of depreciation expense that is included within the reported financial results at question VI-1a.

Item	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Depreciation expense (in \$1,000)								

VI-1e. **LDW line pipe: Depreciation expense classification.**—Please indicate the line item(s) within question VI-1a (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.

--

- VI-2a. **LDW line pipe: Nonrecurring items (charges and gains) included in the LDW line pipe financial results.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question VI-1a. If a nonrecurring item that is not product-specific was allocated to the results at question VI-1a, please report the allocated value, below, rather than the aggregate amount.

Note: The Commission's objective here is to gather information on material (significant) nonrecurring items which impacted the reported financial results for LDW line pipe in question VI-1a.

Item	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
	Value (in \$1,000)							
Nonrecurring item 1								
Nonrecurring item 2								
Nonrecurring item 3								
Nonrecurring item 4								
Nonrecurring item 5								
Nonrecurring item 6								
Nonrecurring item 7								

- VI-2b. **LDW line pipe: Nonrecurring items (charges and gains) included in the large diameter welded pipe financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question VI-1a in which the nonrecurring item is classified.

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

- VI-2c. **LDW line pipe: 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 VI-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 VI-10 identify the specific line items in question VI-1a where these items are reported.

--

- VI-3a. **LDW line pipe: Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of LDW line pipe. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for LDW line pipe 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 VI-1a.

Note: Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to large diameter welded pipe if these assets are also related to other products.

Value (in \$1,000)						
Item	Years					
	2018	2019	2020	2021	2022	2023
Total assets (net)						

- VI-3b. **LDW line pipe: Description of asset values.**—Please provide explanations for any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) included in the above response.

- VI-4a. **LDW line pipe: Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and R&D expenses for LDW line pipe.

Value (in \$1,000)								
Item	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Capital expenditures								
R&D expenses								

- VI-4b. **LDW line pipe: Description of reported capital expenditures.**—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.

- VI-4c. **LDW line pipe: Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm’s reported R&D expenses.

- VI-5a. **LDW line pipe: Data consistency and reconciliation.**—The quantities and values of total net sales reported in question VI-1a should reconcile with the total shipments reported in question III-6 (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.

Reconciliation	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Quantity: Trade data from question III-6 (lines D, F, H, and J) less financial total net sales quantity data from question VI-1a, = zero ("0").	0	0	0	0	0	0	0	0
Value: Trade data from question III-6 (lines E, G, I, and K) less financial total net sales value data from question VI-1a, = zero ("0").	0	0	0	0	0	0	0	0

Is the financial data in question VI-1a reported on a calendar-year basis?

☐ Yes— Complete question VI-5b.

☐ No— Complete question VI-5c

- VI-5b. **LDW line pipe: Data consistency and reconciliation (calendar-year based financial data).**— Do the data in question VI-1a reconcile with the data in question III-6 (i.e., the calculated fields are returning zeros in the table above) for all periods?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

- VI-5c. **LDW line pipe: Data consistency and reconciliation (non-calendar-year based financial data).**— Do the data in question VI-1a reconcile with the data in question III-6 (i.e., the calculated fields are returning zeros) for the January-September periods?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

- VI-6. **Other explanations.**—If your firm would like to further explain a response to a question in Part VI 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.

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PART VII.--FINANCIAL INFORMATION (LDW structural pipe)

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

LDW STRUCTURAL PIPE

VII-1a. **LDW structural pipe: Operations on LDW structural pipe.**—Report the revenue and related cost information requested below on the LDW structural pipe 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.

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 large diameter welded pipe, as well as specific statements and worksheets) used to compile these data.

VII-1a. **LDW structural pipe: Operations on LDW structural pipe.**—*Continued*

Quantity (in short tons) and value (in \$1,000)						
Item	Years					
	2018	2019	2020	2021	2022	2023
Net sales quantities:						
Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales quantities	0	0	0	0	0	0
Net sales values:						
Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales values	0	0	0	0	0	0
Cost of goods sold (COGS):						
Raw materials						
Direct labor						
Other factory costs						
Total COGS	0	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0	0
SG&A expenses						
Operating income (loss)	0	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	0

VII-1a. **LDW structural pipe: Operations on LDW structural pipe.**—*Continued*

Quantity (<i>in short tons</i>) and value (<i>in \$1,000</i>)		
Item	January-September 2023	January-September 2024
Net sales quantities:		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales quantities	0	0
Net sales values:		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales values	0	0
Cost of goods sold (COGS):		
Raw materials		
Direct labor		
Other factory costs		
Total COGS	0	0
Gross profit or (loss)	0	0
SG&A expenses		
Operating income (loss)	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

- VII-1b. **LDW structural pipe: Financial data reconciliation.**—Certain line items from question VII-1a, 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?

		<p>If no--If the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise.</p> <p>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).</p> <p>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.</p>
Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	

- VII-1c. **LDW structural pipe: Raw materials.**—Please report the share of total raw material costs in 2023 (reported in VII-1a) for the following raw material inputs:

Input	Share of total raw material costs (<i>percent</i>)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Steel plate		<input type="checkbox"/>	<input type="checkbox"/>
Steel coils		<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs ¹		<input type="checkbox"/>	<input type="checkbox"/>
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:			

VII-1d. **LDW structural pipe: Depreciation expense.**—Please report the amount of depreciation expense that is included within the reported financial results at question VII-1a.

Item	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Depreciation expense (in \$1,000)								

VII-1e. **LDW structural pipe: Depreciation expense classification.**—Please indicate the line item(s) within question VII-1a (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.

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- VII-2a. **LDW structural pipe: Nonrecurring items (charges and gains) included in the LDW structural pipe financial results.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question VII-1a. If a nonrecurring item that is not product-specific was allocated to the results at question VII-1a, please report the allocated value, below, rather than the aggregate amount.

Note: The Commission's objective here is to gather information on material (significant) nonrecurring items which impacted the reported financial results for LDW structural pipe in question VII-1a.

Item	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
	Value (in \$1,000)							
Nonrecurring item 1								
Nonrecurring item 2								
Nonrecurring item 3								
Nonrecurring item 4								
Nonrecurring item 5								
Nonrecurring item 6								
Nonrecurring item 7								

- VII-2b. **LDW structural pipe: Nonrecurring items (charges and gains) included in the LDW structural pipe financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question VII-1a in which the nonrecurring item is classified.

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

- VII-2c. **LDW structural pipe: 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 VII-2a 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 VII-2b identify the specific line items in question VII-2a where these items are reported.

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- VII-3a. **LDW structural pipe: Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of LDW structural pipe. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for LDW structural pipe 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 VII-1a.

Note: Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to large diameter welded pipe if these assets are also related to other products.

Value (in \$1,000)						
Item	Years					
	2018	2019	2020	2021	2022	2023
Total assets (net)						

- VII-3b. **LDW structural pipe: Description of asset values.**—Please provide explanations for any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) included in the above response.

- VII-4a. **LDW structural pipe: Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and R&D expenses for LDW structural pipe.

Value (in \$1,000)								
Item	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Capital expenditures								
R&D expenses								

- VII-4b. **LDW structural pipe: Description of reported capital expenditures.**—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.

- VII-4c. **LDW structural pipe: Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm’s reported R&D expenses.

- VII-5a. **LDW structural pipe: Data consistency and reconciliation.**—The quantities and values of total net sales reported in question VII-1a should reconcile with the total shipments reported in question IV-6 (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.

Reconciliation	Years						January-September	
	2018	2019	2020	2021	2022	2023	2023	2024
Quantity: Trade data from question IV-6 (lines D, F, H, and J) less financial total net sales quantity data from question VII-1a, = zero ("0").	0	0	0	0	0	0	0	0
Value: Trade data from question IV-6 (lines E, G, I, and K) less financial total net sales value data from question VII-1a, = zero ("0").	0	0	0	0	0	0	0	0

Is the financial data in question VII-1a reported on a calendar-year basis?

☐ Yes— Complete question VII-5b.

☐ No— Complete question VII-5c

- VII-5b. **LDW structural pipe: Data consistency and reconciliation (calendar-year based financial data).**—Do the data in question VII-1a reconcile with the data in question IV-6 (i.e., the calculated fields are returning zeros in the table above) for all periods?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

- VII-5c. **LDW structural pipe: Data consistency and reconciliation (non-calendar-year based financial data).**—Do the data in question VII-1a reconcile with the data in question IV-6 (i.e., the calculated fields are returning zeros) for the January-September periods?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

- VII-6. **Other explanations.**—If your firm would like to further explain a response to a question in Part VII 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.

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PART VIII.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Craig Thomsen (202-205-3226, craig.thomsen@usitc.gov).

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

Name	
Title	
Email	
Telephone	

PRICE DATA

- VIII-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers of the following products produced by your firm.

Product 1.—Line pipe, coated, 42" OD, 0.600" - 1.000" wall, API 5L X52-X70, regardless of length

Product 2.—Line pipe, coated, 32" - 36" OD, 0.350" - 0.800" wall, API 5L X52-X70, regardless of length

Product 3.—Line pipe, coated, 26" - 30" OD, 0.350" - 0.800" wall, API 5L X52-X70, regardless of length

Product 4.—Line pipe, coated, 20" - 24" OD, 0.300" - 0.500" wall, API 5L X60-X70, regardless of length

Product 5.—Structural pipe, 18" - 24" OD, 0.375" - 0.750" wall, ASTM A252, A1035, or similar, regardless of length

Product 6.—Structural pipe, >24" - 32" OD, 0.500" - 1.000" wall, ASTM A252, A1035, or similar, regardless of length

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

- (a) During January 2018-September 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)?

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

VIII-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

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

(Quantity in short tons, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2018:								
January-March								
April-June								
July-September								
October-December								
2019:								
January-March								
April-June								
July-September								
October-December								
2020:								
January-March								
April-June								
July-September								
October-December								
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								
July-September								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:

VIII-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

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

(Quantity in short tons, value in dollars)				
Period of shipment	Product 5		Product 6	
	Quantity	Value	Quantity	Value
2018:				
January-March				
April-June				
July-September				
October-December				
2019:				
January-March				
April-June				
July-September				
October-December				
2020:				
January-March				
April-June				
July-September				
October-December				
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				
July-September				

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

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

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

Product 5:

Product 6:

VIII-2c. **Price data checklist.**--Please check that the pricing data in question VII-2b have been correctly reported.

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

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

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

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The remainder of Part VIII requests information for LDW line pipe and for LDW structural pipe. Please respond based on your firm's production and sales since January 1, 2018. For instance, if your firm produced and sold LDW line pipe but not LDW structural pipe, for questions which allow responses about LDW line pipe and LDW structural pipe separately, please only respond to the part of those questions seeking information regarding LDW line pipe and leave the part of the questions seeking information on LDW structural pipe blank.

VIII-3. **Price setting.**--How does your firm determine the prices that it charges for sales of LDW line pipe and/or LDW structural pipe (*check all that apply*)?

	Transaction by transaction	Contracts	Set price lists	Other	If other, describe
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-4. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

	Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-5. **Pricing terms.**--On what basis are your firm's prices of domestic LDW line pipe and/or LDW structural pipe usually quoted (*check one*)?

	Delivered	F.o.b.	If f.o.b., specify point
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-6. **Contract versus spot.**-- Approximately what shares of your firm's sales of its U.S.-produced LDWP in #termyear were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

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

VIII-7. **Contract provisions.**— Please fill out the table regarding your firm's typical sales contracts for U.S.-produced LDW line pipe and/or LDW structural pipe (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

(1) LDW line pipe

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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
¹ Please identify the indexes used:				

(2) LDW structural pipe

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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
¹ Please identify the indexes used:				

- VIII-8. **Lead times.**-- What share of your firm's sales of its U.S.-produced LDW line pipe and/or LDW structural pipe was from inventory and produced to order, and what was the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced LDWP?

(1) LDW line pipe

Source	Share of 2023 sales	Lead time (average number of days)
From inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

(2) LDW structural pipe

Source	Share of 2023 sales	Lead time (average number of days)
From inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

- VIII-9. **Shipping information.**--

- (a) Who generally arranges the transportation to your firm's customers' locations?

Check one box per row

	Your firm	Purchaser
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Indicate the approximate percentage of your firm's sales of LDW line pipe and/or LDW structural pipe that are delivered the following distances from your firm's production facility.

Distance from your firm's U.S. point of shipment	Share of LDWP line pipe sales	Share of LDW structural pipe sales
Within 100 miles	%	%
101 to 1,000 miles	%	%
Over 1,000 miles	%	%
Total (should sum to 100.0%)	0.0 %	0.0 %

VIII-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced LDW line pipe and/or LDW structural pipe since January 1, 2018 (check all that apply)?

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

VIII-11. **Inland transportation costs.**—What is the approximate percentage of the cost of U.S.-produced LDW line pipe and/or LDW structural pipe that is accounted for by U.S. inland transportation costs?

(a) LDW line pipe: _____ percent.

(b) LDW structural pipe: _____ percent.

VIII-12. **End uses.**--Have there been any changes in the end uses of LDWP since January 1, 2018 or do you anticipate any future changes?

	No	Yes	If yes, explain the changes, noting when these changes occurred or are expected to occur.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-13. **Substitutes.**--Have there been any changes in the number or types of products that can be substituted for LDW line pipe and/or LDW structural pipe since January 1, 2018 or do you anticipate any future changes?

	No	Yes	If yes, explain the changes, noting when these changes occurred or are expected to occur.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-14. **Demand trends.**-- Has demand within the United States and outside of the United States (if known) for LDW line pipe and/or LDW structural pipe steadily increased, fluctuated upward (i.e., ended higher), not changed (or varied but ended around the same level), fluctuated downward (i.e., ended lower), or steadily decreased since January 1, 2018, and how do you anticipate demand will change in the future? Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Select one box per row.

	Market	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease	Explanation and factors
(1) LDW line pipe	Demand since January 1, 2018						
	Within the United States: Oil and gas sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Other sectors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Overall demand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Anticipated future demand						
	Within the United States: Oil and gas sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Other sectors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Overall demand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	Demand since January 1, 2018						
	Within the United States: Construction sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Other sectors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Overall demand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Anticipated future demand						
	Within the United States: Construction sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Other sectors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Overall demand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-15. **Business cycles.**--Is the LDW line pipe and/or LDW structural pipe market subject to business cycles, either during the year or across years? If yes, describe.

	No	Yes	If yes, please describe, including any changes since January 1, 2018.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-16. **Conditions of competition.**--Is the LDW line pipe and/or LDW structural pipe market subject to conditions of competition distinctive to LDWP other than the business cycles described in the previous question? If yes, describe.

	No	Yes	If yes, please describe, including any changes since January 1, 2018.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-17. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of LDW line pipe and/or LDW structural pipe since January 1, 2018 or do you anticipate any future changes?

	No	Yes	If yes, please describe, noting when these changes occurred or are expected to occur.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-18. **Availability of supply.**--Has the availability of LDW line pipe and/or LDW structural pipe in the U.S. market changed since January 1, 2018? Do you anticipate any future changes?

(1) LDW line pipe

Availability in the U.S. market	No	Yes	Please explain, noting the countries, the impact on imports from those countries, and reasons for the changes.
Changes since January 1, 2018:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Canada, China, Greece, India, South Korea (subject), and Turkey (subject)	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Canada, China, Greece, India, South Korea (subject), and Turkey (subject)	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

(2) LDW structural pipe

Availability in the U.S. market	No	Yes	Please explain, noting the countries, the impact on imports from those countries, and reasons for the changes.
Changes since January 1, 2018:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Canada, China, South Korea, and Turkey	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from Canada, China, South Korea, and Turkey	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-19. **Supply constraints.**--Has your firm refused, declined, or been unable to supply LDW line pipe and/or LDW structural pipe since January 1, 2018 (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, etc.)?

	No	Yes	If yes, please describe.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-20. **Raw materials.**-- Have LDW line pipe and/or LDW structural pipe raw material prices steadily increased fluctuated upward (i.e., ended higher), not changed (or varied but ended around the same level), fluctuated downward (i.e., ended lower), or steadily decreased since January 1, 2018, and how do you expect they will change in the future?

Select one box per row.

	Raw materials prices	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease	Explain, noting how raw material price changes have affected your firm's selling prices for LDWP.
(1) LDW line pipe	Changes since January 1, 2018	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	Changes since January 1, 2018	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-21. **North American market integration.**--Please indicate how integrated the North American market (United States, Canada, and Mexico) for LDW line and structural pipe is, and describe in what ways they are integrated.

	Extremely	Very	Moderately	Somewhat	Slightly	Explain
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-22. **Role of section 301 tariffs.**-- Did the tariffs on Chinese-origin products under section 301, or changes in these tariffs, have an impact on the LDW line pipe and/or LDW structural pipe market in the United States, including any effects on LDW line pipe and/or LDW structural pipe cost, price, supply, and/or demand, since January 1, 2018?

	Yes	No	Don't know
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

(1) LDW line pipe	
(2) LDW structural pipe	

VIII-23. **Role of section 232 measures.**—Did the measures (e.g., tariffs, quotas, etc.) on imported steel/aluminum products under section 232, or changes in the measures (such as the level, coverage, or nature of the measures), have an impact on the LDW line pipe and/or LDW structural pipe market in the United States, including any effects on LDW line pipe and/or LDW structural pipe cost, price, supply, and/or demand, since January 1, 2018?

	Yes	No	Don't know
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

(1) LDW line pipe	
(2) LDW structural pipe	

Please indicate to what extent disparate section 232 measures had on the impact on availability from LDWP sources.

(1) LDW line pipe	
(2) LDW structural pipe	

VIII-24. **Price comparisons**.-- Are you aware of prices of LDWP in non-U.S. markets? If yes, please compare market prices of LDW line pipe and/or LDW structural pipe in U.S. and non-U.S. markets. Provide information as to time periods and regions for any price comparisons and note the sources for your market knowledge.

	No	Yes	If yes, please describe.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-25. **Interchangeability.**—How often is LDWP 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

(1) LDW line pipe

Country-pair	Canada	China	Greece	India	South Korea (subject)	Turkey (subject)	Other countries
United States							
Canada							
China							
Greece							
India							
South Korea (subject)							
Turkey (subject)							

For any country-pair producing LDW line pipe which is *sometimes* or *never* interchangeable, please identify the country-pair and explain the factors that limit or preclude the interchangeable use of LDW line pipe produced in the countries:

(2) LDW structural pipe

Country-pair	Canada	China	South Korea	Turkey	Other countries
United States					
Canada					
India					
South Korea					
Turkey					

For any country-pair producing LDW structural which is *sometimes* or *never* interchangeable, please identify the country-pair and explain the factors that limit or preclude the interchangeable use of LDW structural pipe produced in the countries:

VIII-26. **Factors other than price.**—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between LDWP produced in the United States and in other countries a significant factor in your firm's sales of the products? Please indicate A, F, S, N, or O in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

(1) LDW line pipe

Country-pair	Canada	China	Greece	India	South Korea (subject)	Turkey (subject)	Other countries
United States							
Canada							
China							
Greece							
India							
South Korea (subject)							
Turkey (subject)							

For any country-pair for which factors other than price are *always* or *frequently* a significant factor in your firm's sales of LDW line pipe, identify the country-pair and the relevant factors other than price and report the advantages or disadvantages imparted by such factors:

(2) LDW structural pipe

Country-pair	Canada	China	South Korea	Turkey	Other countries
United States					
Canada					
China					
South Korea					
Turkey					

For any country-pair for which factors other than price are *always* or *frequently* a significant factor in your firm's sales of LDW structural pipe, identify the country-pair and the relevant factors other than price and report the advantages or disadvantages imparted by such factors:

VIII-27. **Export constraints.**--Describe how easily your firm can shift its sales of LDWP between the U.S. market and alternative export markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting LDWP between the U.S. and alternative export markets within a 12-month period.

(1) LDW line pipe	
(2) LDW structural pipe	

VIII-28. **Barriers to trade.**--Are your firm's exports of LDWP subject to any tariff or non-tariff barriers to trade in other countries?

	No	Yes	If yes, please list the countries and describe any such barriers and any significant changes in such barriers that have occurred since January 1, 2018, or that are expected to occur in the future.
(1) LDW line pipe	<input type="checkbox"/>	<input type="checkbox"/>	
(2) LDW structural pipe	<input type="checkbox"/>	<input type="checkbox"/>	

VIII-29. **Other explanations.**--If your firm would like to further explain a response to a question in Part VIII that did not provide a narrative response box, 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.

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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.

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

Web address: <https://usitc.gov/qportal> **Pin:** LDWP **Phase:** Review

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

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

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