

FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

CERTAIN ALKYL PHOSPHATE ESTERS FROM CHINA

This questionnaire must be received by the Commission by **January 27, 2025**
See last page for instructions regarding how to file this questionnaire.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping and countervailing duty investigations concerning certain alkyl phosphate esters ("CAPEs") from China (Inv. Nos. 701-TA-721 and 731-TA-1689 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII.

Name of firm _____

Address _____

Website _____

Has your firm produced or exported CAPEs (as defined on next page) from China at any time since January 1, 2021?

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

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

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

CERTIFICATION

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

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

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background. --These proceedings were instituted in response to petitions filed on April 23, 2024, by ICL-IP America, Inc., St. Louis, Missouri. Antidumping and/or countervailing duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce (“Commerce”) makes an affirmative determination of subsidization and/or dumping. Pertinent information to these proceedings is available at:

Questionnaires: https://usitc.gov/reports/active_import_injury_questionnaires.

Other case information: <https://ids.usitc.gov/case/8193/investigation/8606>.

CAPEs covered by these proceedings are halogenated and non-halogenated phosphorus-based esters with a phosphorus content of at least 6.5 percent (per weight) and a viscosity between 1 and 2000 mPa.s (at 20-25 °C). Merchandise subject to these investigations primarily includes Tris (2-chloroisopropyl) phosphate (TCPP), Tris (1,3-dichloroisopropyl) phosphate (TDCP), and Triethyl Phosphate (TEP).

TCPP is also known as Tris (1-chloro-2-propyl) phosphate, Tris (1-chloropropan-2-yl) phosphate, Tris (monochloroisopropyl) phosphate (TMCP), and Tris (2-chloroisopropyl) phosphate (TCIP). TCPP has the chemical formula $C_9H_{18}Cl_3O_4P$ and the Chemical Abstracts Service (CAS) Nos. 1244733-77-4 and 13674-84-5. It may also be identified as CAS No. 6145-73-9.

TDCP is also known as Tris (1,3-dichloroisopropyl) phosphate, Tris (1,3-dichloro-2-propyl) phosphate, Chlorinated tris, tris {2-chloro-1-(chloromethyl ethyl)} phosphate, TDCPP, and TDCIPP. TDCP has the chemical formula $C_9H_{15}Cl_6O_4P$ and the CAS No. 13674-87-8.

TEP is also known as Phosphoric acid triethyl ester, phosphoric ester, flame retardant TEP, Tris(ethyl) phosphate, Triethoxyphosphine oxide, and Ethyl phosphate (neutral). TEP has the chemical formula $(C_2H_5O)_3PO$ and the CAS No. 78-40-0.

Imported alkyl phosphate esters are not excluded from the scope of these investigations even if the imported alkyl phosphate ester consists of a single isomer or combination of isomers in proportions different from the isomers ordinarily provided in the market. Also included in these investigations are blends including one or more alkyl phosphate esters, with or without other substances, where the alkyl phosphate esters account for 20 percent or more of the blend by weight.

CAPEs are currently imported under statistical reporting number 2919.90.5050 of the Harmonized Tariff Schedule of the United States (HTSUS). They may also be imported under HTSUS statistical reporting numbers 2919.90.5010 and 3824.99.5000. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

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

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

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

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

Valid number error messages.--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Celia Feldpausch (202-205-2387, celia.feldpausch@usitc.gov).

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

"Establishment"--Each facility of a firm in China involved in the production or export of CAPEs, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities. Firms operating more than one establishment in China should combine the data for all establishments into a single report.

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“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-3. **Related producers.**--Does your firm or any related firm produce, have the capability to produce, or have any plans to produce CAPEs in the United States or other countries?

No	Yes	If yes, please name the firm(s) and country(ies) below and, if U.S. producer(s), ensure that they complete the Commission's producer questionnaire.
<input type="checkbox"/>	<input type="checkbox"/>	

- I-4. **Related U.S. importers.**--Does your firm or any related firm import or have any plans to import CAPEs into the United States?

No	Yes	If yes, please name the firm(s) below and ensure that they complete the Commission's importer questionnaire.
<input type="checkbox"/>	<input type="checkbox"/>	

- I-5. **Stock symbol information.**-- If your firm or any of the entities reported in questions I-2 through I-4 are publicly traded in the United States, please specify the stock exchange and trading symbol (including American Depositary Receipts, if applicable): _____.

- I-6. **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-7. **U.S. importers.**--Please provide the names, contacts, telephone numbers, and e-mail addresses of the **TEN** largest U.S. importers of your firm's CAPEs since January 1, 2021.

Importer's name		Contact person	Email	Telephone	Share of your firm's 2023 U.S. exports (%)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Celia Feldpausch (202-205-2387, celia.feldpausch@usitc.gov). Supply all data requested on a calendar-year basis.

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

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of CAPEs since January 1, 2021.

Check as many as appropriate.		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
<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)	

- II-2b. **COVID-19 pandemic.**—Has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, production, and shipments (including exports to the United States) relating to CAPEs? 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 and (b) production and shipments with respect to CAPEs.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-2c. **Anticipated changes in operations.**—Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of CAPEs 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"/>	

- II-3a. **Production using same machinery.**--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce CAPEs, 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 CAPEs capacity" – The level of production of CAPEs 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 CAPEs based on the actual product mix experienced over the period.

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

Takes into account	Installed overall capacity	Practical overall capacity	Practical CAPEs 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 CAPEs	No	No	Yes

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

Quantity (in metric tons)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
Capacity measures:					
Installed overall capacity ¹					
Practical overall capacity ^{1 2}					
Practical CAPEs capacity ^{3 4}	0	0	0	0	0
Production of:					
CAPEs ^{3 4}	0	0	0	0	0
Other products ⁵					
Total production using same machinery or workers	0	0	0	0	0
¹ Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period. ² Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" and "practical" overall production capacities. ³ Data entered in question II-9 for this indicator will populate here. ⁴ Data reported for practical CAPEs capacity should be greater than the data reported for production of CAPEs 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 CAPEs then "practical overall" and "practical CAPEs" capacity measures should be equal to each other. ⁵ Please identify these products: _____.					

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

Hours per week	Weeks per year

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

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

Constraint (check as many as appropriate)		Description (If checked, please describe the details, timing, and duration of the constraint; leave completely blank if not applicable)
<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)	

- II-3e. **Reaching installed overall capacity.**--Please describe and quantify the amount of time it would take and the additional actions that would be needed (e.g., hiring new workers, expanding shifts, procuring larger sources of raw material supply, etc.) for your firm to be able to fully utilize the reported installed overall capacity reported in II-3a.

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- II-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 CAPEs.

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- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between CAPEs 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.

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

Item	✓ if Yes
Are all three capacity measures reported based on <u>currently installed 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 CAPEs 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 CAPEs capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical CAPEs 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 CAPEs 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.

- II-6. **Share of sales.**--What percentage of your firm's total sales in its most recent fiscal year was represented by sales of CAPEs? _____ percent.
- II-7a. **Firm's estimated share of production in China.**--Please estimate the percentage of total production of CAPEs in China accounted for by your firm's production in 2023. _____ percent.
- II-7b. **Firm's estimated share of exports from China.**--Please estimate the percentage of total exports to the United States of CAPEs from China accounted for by your firm's exports in 2023. _____ percent.
- II-8. **Third country trade actions.**--Is the CAPEs exported by your firm subject to antidumping/countervailing duty/safeguard findings, remedies, or proceedings?

No	Yes	If yes--List the products(s), countries affected, and the date of such findings/remedies/proceedings.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-9. **Trade data.**--Report your firm's capacity, production, shipments, and inventories related to the production of CAPEs in your establishment(s) in China during the specified periods. Do not include resales of CAPEs that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-10.

Do not submit data by manufacturing facility if they are in the same country. If your firm has multiple manufacturing establishments within one country, you are required to combine data for those establishments within one foreign producer questionnaire response.

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

"Shipments"--Shipments of products produced in your establishment(s) in China. Quantities reported should be net of returns.

"Home market commercial shipments"--Shipments, other than internal consumption and transfers to related firms, within China.

"Home market internal consumption/transfers to related firms"--Shipments made to related firms in China, including product consumed internally by your firm.

"Export shipments"--Shipments to destinations outside of the country indicated on page 1 (China), 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.

Item	Actual experience					Projections	
	Calendar year			January-September		Calendar year	
	2021	2022	2023	2023	2024	2024	2025
B + C – D – E – F – G – J = should equal zero ("0") or provide an explanation. ¹	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:							

- II-10. **Exports to the United States not produced by your firm.**--Report your firm's exports to the United States of CAPEs that was produced in China but not by your firm during the specified periods. Note these data should **not** be included in question II-9.

Quantity (in metric tons)							
Item	Actual experience					Projections	
	Calendar year			January-September		Calendar year	
	2021	2022	2023	2023	2024	2024	2025
Exports of CAPEs to the United States not produced by your firm ¹							
¹ List the producer(s). _____.							

- II-11. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

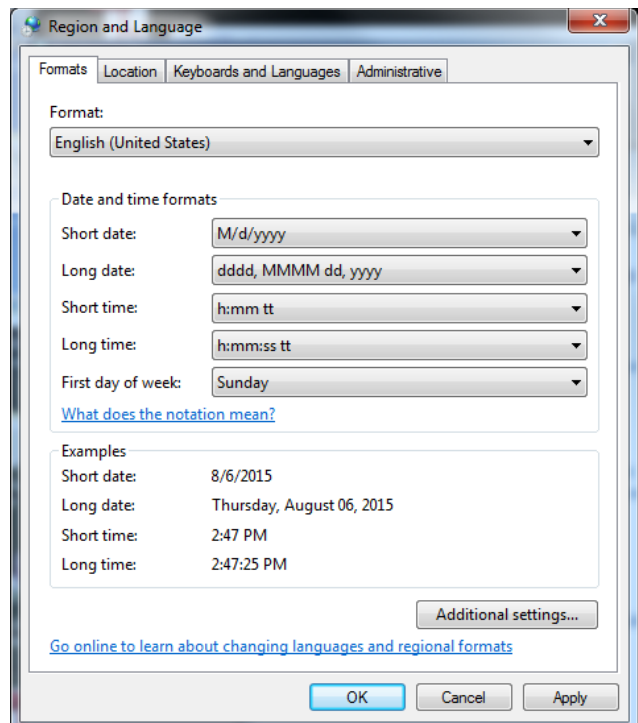
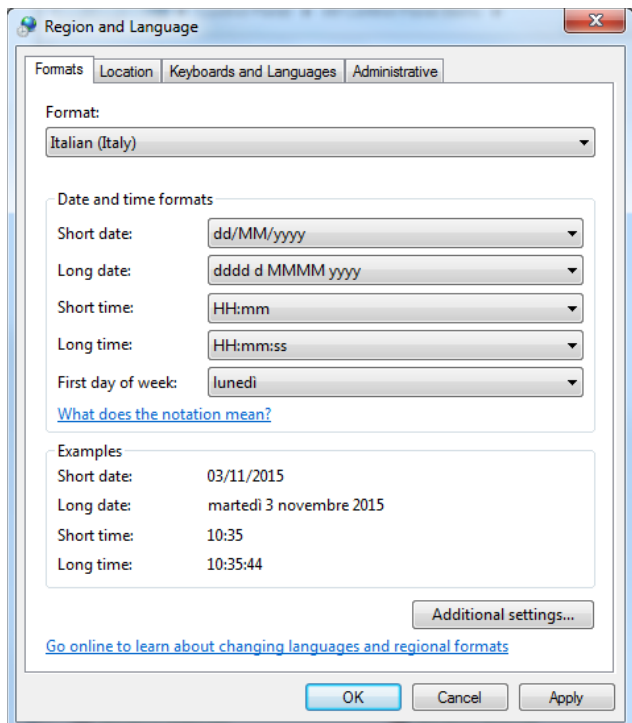
Correcting Valid number error messages.--If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields.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

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

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

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

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



HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

https://usitc.gov/reports/active_import_injury_questionnaires.

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:** FIRE **Phase:** Final

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

If your firm did not produce or export 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.