FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

ERYTHRITOL FROM CHINA

This questionnaire must be received by the Commission by <u>December 27, 2024</u>

See last page for instructions regarding how to file this questionnaire.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping and countervailing duty investigations concerning erythritol from China (Inv. Nos. 701-TA-751 and 731-TA-1729 (Preliminary)). 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 firn	n produced or	exported erythrito	ol (as defined or	next page)	at any tir	ne since J	anuary 1	, 2021	2	
	□ NO	(Sign the cer	ification below and pr	romptly return o ı	nly this page o	of the ques	tionnaire to	the Con	nmission		
	☐ YES	(Complete al	parts of the question	nnaire, and return	the entire qu	uestionnaiı	e to the Co	mmissior	1)		
	-		a the Commission . (PIN: SWEET, Ph	-	-	_		_	ctions		
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PART I.—GENERAL INFORMATION

Background. --This proceeding was instituted in response to petitions filed on December 13, 2024 by Cargill, Incorporated, Wayzata, Minnesota. Antidumping and countervailing duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of dumping and/or subsidization. Pertinent information to this proceeding is available at:

Questionnaires: https://usitc.gov/reports/active import injury questionnaires. Other case information: https://ids.usitc.gov/case/8245/investigation/8674

<u>Erythritol</u> covered by this proceeding is a sugar alcohol, commonly referred to as a polyol, typically produced by the fermentation of glucose using enzymes and yeast or yeast-like fungi (though the scope includes erythritol produced using any other feedstock or organism).

Erythritol is an organic compound with the molecular formula $C_4H_{10}O_4$ and a Chemical Abstract Service ("CAS") registry number of 149-32-6. Other names for erythritol include *meso*-erythritol, (2R, 3S)-butan-1,2,3,4-tetrol, butane-1,2,3,4-tetrol, or *meso*-1,2,3,4-Tetrahydroxybutane.

Erythritol typically appears as a white crystalline, odorless product that rapidly dissolves in water. While erythritol is typically produced in the crystalline form or as a fine powder or in directly compressible form, the scope of these investigations covers all physical forms and grades of erythritol.

Erythritol is currently imported under statistical reporting number 2905.49.4000 of the Harmonized Tariff Schedule of the United States (HTSUS). It may also be imported under HTSUS statistical reporting number 2106.90.9998. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Reporting of information</u>.--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.

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

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

<u>Release of information</u>.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and

other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

<u>Valid number error messages.</u>—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 are provided at the end of this questionnaire and are 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.

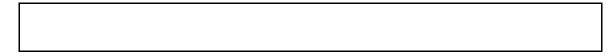
Hours	Dollars

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. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire.

" <u>Establishment"</u> Each facility of a firm in China involved in the production or export of
erythritol, 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.



"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 erythritol in the United States or other countries?

No	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.

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

No	If yes, please name the firm(s) below and ensure that they complete the Commission's importer questionnaire.

- I-5. <u>Stock symbol information.</u>— 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 Depository 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>U.S. importers</u>.--Please provide the names, contacts, telephone numbers, and e-mail addresses of the <u>TEN</u> largest U.S. importers of your firm's erythritol 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 celia.feldpausch@usitc.gov).

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. <u>Changes in operations.</u>--Please indicate whether your firm has experienced any of the following changes in relation to the production of erythritol 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
	Plant openings	
	Plant closings	
	Prolonged shutdowns	
	Production curtailments	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Weather-related or force majeure events	
	Other (e.g., revised labor agreements, technology)	

II-2b.	COVID-19 pandemic. — Since January 1, 2021, 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 erythritol? In your response, please discuss the duration and timing of
	any such changes as they relate to your firm's operations.

No	If yes, describe these changes including the impact over time on the (a) supply chain and (b) production and shipments with respect to erythritol.

II-2c. <u>Anticipated changes in operations.</u>--Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of erythritol in the future?

No	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.

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 erythritol, and the combined capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

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

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

"Practical erythritol capacity" – The level of production of erythritol 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 erythritol 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 erythritol 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 erythritol	No	No	Yes

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

Quantity (in 1,000 pounds)						
	Calendar year			January-S	January-September	
Item	2021	2022	2023	2023	2024	
Capacity measures: Installed overall capacity ¹						
Practical overall capacity ¹²						
Practical <i>erythritol</i> capacity ^{3 4}	0	0	0	0	0	
Production of: Erythritol ^{3 4}	0	0	0	0	0	
Out-of-scope products: Other polyol sweeteners						
Other products ⁵						
Subtotal, out-of-scope products	0	0	0	0	0	
Total production using same machinery or workers	0	0	0	0	0	

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

5	Please	identify	vthese	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

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 erythritol capacity should be greater than the data reported for production of erythritol 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 erythritol then "practical overall" and "practical erythritol" capacity measures should be equal to each other.

firm's were report but wa	practical overall capacity over the pe binding over different periods reporte ted practical overall capacity. If a cons	rise describe the constraint(s) that set the limit(s) on your riod reported in question II-3a. If different constraints ed, please specify when each constraint was limiting your straint was not actually binding over the period reported, stalled capacity level, indicate at what level it would have
	straint ck as many as appropriate)	Description (If checked, please describe the details, timing, and durat of the constraint; leave completely blank if not applicable
	Production bottlenecks	
	Existing labor force	
	Supply of material inputs	
	Fuel or energy	
	Storage capacity	
	Logistics/transportation	
	Other constraints (list the specific constraints in the description field)	
and th	ne additional actions that would be ne	e describe and quantify the amount of time it would take eded (e.g., hiring new workers, expanding shifts, pply, etc.) for your firm to be able to fully utilize the lin II-3a.

II-3f. II-4.	overall of prod capacit	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 element 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 erythritol.					
	Produc	•	n able to switch production (capacity) between erythritol and other products ame 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.				
	(b)	(e.g., time,	cribe the factors that affect your firm's ability to shift capacity between products , cost, relative price change, etc.), and the degree to which these factors enhance in such shifts.				

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

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

Note: I reporte 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 erythritol? percent.
- Firm's estimated share of production in China.--Please estimate the percentage of total production of erythritol 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 erythritol from China accounted by your firm's exports in 2023. percent.
- II-8. Third country trade actions.--Is the erythritol exported by your firm subject to antidumping/countervailing duty/safeguard findings, remedies, or proceedings?

No	Yes	If yesList the products(s), countries affected, and the date of such findings/remedies/proceedings.

II-9. <u>Trade data</u>.--Report your firm's capacity, production, shipments, and inventories related to the production of erythritol in your establishment(s) in China during the specified periods. Do not include resales of erythritol 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.

<u>Do not submit data by manufacturing facility if they are in the same country.</u> 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.

II-9. **Trade data.**--Continued.

	Act alendar yea	ual experie	nce		Projec	tions1
	alendar yea				,	.CIO113-
2021	•	r	January-September		Calendar year	
2021	2022	2023	2023	2024	2024	2025
0	0	0	0	0	0	(
0	0	0	0	0	0	(
	0		0 0 0	0 0 0 0	0 0 0 0	0 0 0 0 0

¹ Explain the basis of your firm's projections: ______.

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line J) 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, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Actual experience				Projections		
	Calendar year			January-	September	Calendar year	
Item	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:

² Report your firm's practical erythritol capacity consistent with the definitions and instructions included in question II-3a.

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

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

	Q	uantity (in	1,000 poun	ds)			
	Actual experience				Projections		
	Calendar year January-September				Calendar year		
Item	2021	2022	2023	2023	2024	2024	2025
Exports of erythritol 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.

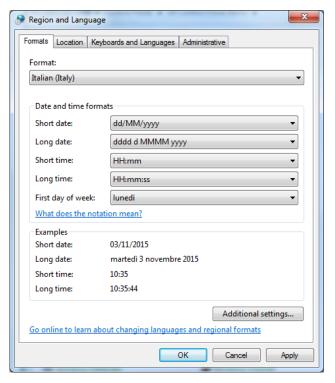
Correcting valid number error messages. -- If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. 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.

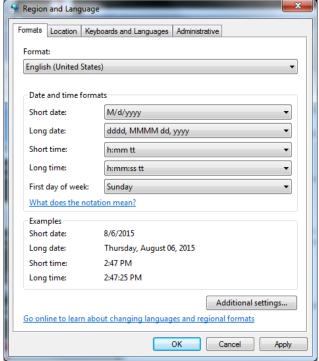
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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.

• <u>Upload via Commission's secure submission portal</u>.— 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: SWEET Phase: Preliminary

• 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.