## **U.S. IMPORTERS' QUESTIONNAIRE**

## METHYLENE DIPHENYL DIISOCYANATE ("MDI") PRODUCTS FROM CHINA

This questionnaire must be received by the Commission by <u>February 26, 2025.</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 duty investigation concerning MDI products from China (inv. No. 731-TA-1733 (Preliminary)). 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 importe 2022?	ed MDI products (as defined on next page) from	n any country at any time since January 1,	
NO (Sign th	ne certification below and promptly return <b>only</b> this	page of the questionnaire to the Commission)	
YES (Compl	ete all parts of the questionnaire, and return the en	tire questionnaire to the Commission)	
	CERTIFICATION	e is complete and correct to the best of my knowledge	
belief and understand that fication I also grant consen	the information submitted is subject to audit t for the Commission, and its employees and c	and verification by the Commission. By means of the contract personnel, to use the information provided by proceedings conducted by the Commission on the	
eeding or other proceeding onnel (a) for developing or ws, and evaluations relatin (ii) by U.S. government en	gs may be disclosed to and used: (i) by the C maintaining the records of this or a related ng to the programs, personnel, and operations	to this request for information and throughout the Commission, its employees and Offices, and contract proceeding, or (b) in internal investigations, audit of the Commission including under 5 U.S.C. Appendybersecurity purposes. I understand that all contracts	
e of Authorized Official	Title of Authorized Official	Date	
nture			

#### PART I.—GENERAL INFORMATION

**Background.**--This proceeding was instituted in response to a petition filed on February 12, 2025, by the MDI Fair Trade Coalition consisting of BASF Corporation, Florham Park, New Jersey; and The Dow Chemical Company, Midland, Michigan. Antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of dumping. Pertinent information to this proceeding is available at:

Questionnaires: <a href="https://usitc.gov/reports/active">https://usitc.gov/reports/active</a> import injury questionnaires. Other case information: <a href="https://ids.usitc.gov/case/8267/investigation/8705">https://ids.usitc.gov/case/8267/investigation/8705</a>

MDI products covered by this petition is aromatic polyisocyanate material whose composition includes two or more isocyanate groups (i.e., functional group containing a nitrogen atom, a carbon atom, and an oxygen atom bonded together (-NCO)) attached to one or more benzene rings (i.e., flat, symmetrical molecule made up of six carbon atoms arranged in a hexagonal ring and has the chemical formula C6H6) that are joined by methylene bridges (i.e., a carbon atom bound to two hydrogen atoms (-CH2-) and connected by single bonds to two other distinct atoms in the rest of the molecule). These products are commonly called Polymeric, Monomeric, or Modified Methylene Diphenyl Diisocyanate ("MDI") and also known as Methylene bisphenyl isocyanate, 4,4'-Diphenylmethane diisocyanate, Methylene di-phenylene ester of isocyanic acid, Methylene bis(4-phenyl isocyanate), among others. MDI is normally associated with Chemical Abstracts Service ("CAS") registry numbers 9016-87-9, 101-68-8, 5873-54-1, 2536-05-2, 2536-05-2, 25686-28-6, 26447-40-5, and 39310-05-9, but several others are also used.

MDI ranges in physical form from low viscosity liquids to solids. MDI is covered by the scope of this petition irrespective of whether it has gone through a distillation process and regardless of acid content, reactivity, functionality, freeze stability, physical form, viscosity, grade, purity, molecular weight, or packaging.

MDI may contain additives, such as catalysts, solvents, plasticizers, antioxidants, fire retardants, colorants, pigments, diluents, thickeners, fillers, softeners, toughening agents. The scope does not include mixtures of MDI with other materials, when the combined MDI component comprises less than 40 percent of the total weight of the mixture.

MDI may be partially reacted with itself, polyol, or polyamines, and retain MDI component that has not fully chemically reacted so as to convert it into a different product no longer containing isocyanate groups. These products are known as homopolymer, uretonimine MDI, carbodiimide MDI, or prepolymers. The scope does not include partially reacted MDI when its NCO content is less than 10 weight percentage.

For MDI that enter as part of a system with separately packaged polyol, only the MDI portion of the system is included in the scope. The scope does not include any separately packaged polyol that would not fall within the scope if entered on its own.

The scope includes merchandise matching the above description that has been processed in a third country, including by commingling, diluting, introducing or removing additives, or performing any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the subject country.

The scope also includes MDI that is commingled or blended with MDI from sources not subject to this investigation. Only the subject component of such commingled products is covered by the scope of this investigations.

This merchandise is currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 2929.10.8010 and 3909.31.0000. Subject merchandise may also be entered under subheadings 3909.50.5000, 3824.99.2900, 3824.99.9397, 3506.91.5000, 3815.90.5000, 3911.90.4500, 3921.13.5000, 3920.99.5000. The HTSUS subheadings are provided for convenience and customs purposes only; the written description of the scope is dispositive.

<u>Importer</u>.--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing MDI products (as defined above) into the United States from a foreign manufacturer or through its selling agent.

<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, and/or purchaser questionnaire), you need not respond to duplicated questions.

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

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

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

<u>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 Lawrence Jones (202-205-3358, lawrence.jones@usitc.gov).

<u>D-GRIDS tool.</u>--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macroenabled MS Excel file available for download from the Commission's generic questionnaires webpage (<a href="https://www.usitc.gov/trade\_remedy/question.htm">https://www.usitc.gov/trade\_remedy/question.htm</a>) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is <u>optional</u>. 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 40 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, <a href="import\_injury@usitc.gov">import\_injury@usitc.gov</a>.

I-2a. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire.

" <u>Establishment</u> "Each facility of a firm involved in the <u>importation</u> of MDI products, including
auxiliary facilities operated in conjunction with (whether or not physically separate from) such
facilities.

U.S. In	nporters' Questionnai	ire – MDI Products (Preliminary)	Page 5
I-2b.		ng activitiesSince January 1, 2022, has your firm firm f MDI products into another product that match	•
	No Yes	If yes <u>COMPLETE AND RETURN A U.S. PROD</u>	UCERS' QUESTIONNAIRE
I-2c.		mation If your firm or parent firm is publicly to the land of t	raded, please specify the
I-2d.		If your firm or parent firm is represented by ext ease specify the name of the law firm and the lea	
	Law firm:		
	Lead attorney(s):		
I-3.		r firm owned, in whole or in part, by any other fi	
	Firm name	Country	Extent of ownership (percent)

oreign, that are enga	<b>porters</b> Does your firm have any relate ged in importing MDI products from Chir	na into the United States or
	ting MDI products from China to the Unit esList the following information.	ed States?
Firm name	Country	Affiliation
Firm name	Country	Affiliation
		7
	2Please indicate the nature of your firmer of record is expected to complete this be applicable.	's importing operations on

115	Importors'	Questionnaire	- MDI Products	(Proliminary
U.S.	importers	Questionnaire	- IVIDI Products	tereliminary

I-7.	 •	OI products but is not the consignee, telephone number, and individual to
		Contact per

Firm name	Address	Contact person and phone number

I-8. **FTZ or bonded warehouses**.--Please indicate whether your firm admits MDI products into, or withdraws such merchandise from, foreign trade zones or bonded warehouses.

"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, as well as other savings. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

"Bonded warehouse" is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designated as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

Item	No	Yes	Quantity (in short tons) admitted in 2024
Foreign trade zones			
Bonded warehouses			

I-9. Other trade actions.--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

No	Yes	If yes, Yes-Please specify.

## PART II.--TRADE AND RELATED INFORMATION

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 <u>calendar-year</u> basis**.

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

Name	
Title	
Email	
Telephone	

II-2. <u>Changes in operations.</u>—Has your firm experienced any changes in ownership or in the nature of its importing operations for MDI products since January 1, 2022?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and describe reasons for the changes, including any underlying assumptions used.

	uestioiiiiaii	re – <b>MDI Products (</b> I	,,		Page
_		-Has your firm imported or arranged for the importation of MDI products for mber 31, 2024?			
_	ct merchan	' are imports for whi ndise, but delivery of			
No	Yes				
		If yes, fill out the t	able below.		
			Per	iod	
Se	ource	Jan-Mar 2025	Apr-Jun 2025	Jul-Sept 2025	Oct-Dec 202
		Quantity (in short tons)			
			Qualitity (III	1	
China			Qualitity (III		
All other	source bet	nonth period preced tween February 1, 20 nonth in 2025 combi	ing the petitionHa	as your firm importe	-
All other	n the 12-m	tween February 1, 20 nonth in 2025 combi	ing the petitionHa	as your firm importe 2025? (i.e., the last	11 months in
All other	in the 12-m source bet the first m	tween February 1, 20 nonth in 2025 combi	ing the petitionHa 024 and January 31, ned)	as your firm importe 2025? (i.e., the last	11 months in
All other	in the 12-m source bet the first m	If yes, report the c	ing the petitionHa D24 and January 31, ned) quantity of such imp	as your firm importe 2025? (i.e., the last port below by source	11 months in
All other	in the 12-m source bet the first m	If yes, report the c	ing the petitionHa 024 and January 31, ned) quantity of such imp antity (in short tons February 2024 thro	as your firm importe 2025? (i.e., the last port below by source	11 months in
All other	in the 12-m source bet the first m	If yes, report the control of the co	ing the petitionHabitan January 31, med)  quantity of such impartity (in short tons)  February 2024 throsified under	as your firm importe 2025? (i.e., the last port below by source ) ugh January 2025	11 months in
All other	in the 12-m source bet the first m	If yes, report the c	ing the petitionHa 024 and January 31, ned) quantity of such imp antity (in short tons February 2024 throus sified under S numbers	as your firm importe 2025? (i.e., the last port below by source	11 months in
All other	source bet the first m	If yes, report the control of the co	ing the petitionHa 024 and January 31, ned) quantity of such imp antity (in short tons February 2024 throus sified under S numbers	as your firm imported 2025? (i.e., the last port below by sourced)  ugh January 2025  Imports classif	11 months in

### **Definitions**

"Imports" –Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty).

"Import quantities" —Quantities reported should be net of returns.

"Import values" — Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

"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.

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

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

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

II-5a. <u>U.S. imports from China</u>.—Report your firm's imports and your firm's shipments and inventories of MDI products imported from China by your firm during the specified periods.

## China

Quantity (in short tons), value (in \$1,000)				
		Calendar year		
Item	2022	2023	2024	
Beginning-of-period inventories (quantity) (A)				
Imports classified under: <sup>1</sup> Primary HTS numbers <sup>2</sup> Quantity (B)				
Value (C)				
Other HTS numbers <sup>3</sup> Quantity (D)				
Value (E)				
U.S. shipments: Commercial shipments: Quantity (F)				
Value (G)				
Internal consumption: <sup>4</sup> Quantity (H)				
Value³ (I)				
Transfers to related firms: <sup>4</sup> Quantity (J)  Value <sup>4</sup> (K)				
Export shipments: <sup>5</sup> Quantity (L)				
Value (M)				
End-of-period inventories: (quantity) (N)				
Please identify the foreign producers, if known The primary HTSUS statistical reporting numbe Please identify the other HTSUS statistical report Internal consumption and transfers to related different basis for valuing these transactions in you  However, the data provided above in this t	ers are 2929.10.8010 orting numbers: firms must be valued ur records, please sp	d at fair market value. ecify that basis (e.g., co		

#### II-5a. U.S. imports from China.—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and D), less total shipments (i.e., lines F, H, J, and L). 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.

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

<sup>&</sup>lt;sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: \_\_\_\_\_.

II-5b. <u>Channels of distribution: China</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by channel of distribution during the specified periods.

## China

Quantity (in short tons)				
	Calendar year			
Item	2022	2023	2024	
Channels of distribution:				
U.S. shipments:				
To distributors (O)				
To distillers and processors (P)				
To end users (Q)				

<u>RECONCILIATION OF CHANNELS.</u>--Please ensure that the quantities reported for channels of distribution (i.e., lines O through Q) in each time period equal the quantity reported for U.S. shipments (i.e., line F, H, J) 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.

		Calendar year	
Reconciliation item	2022	2023	2024
O + P + Q - F - H - J = zero ("0"), if not revise.	0	0	0

II-5c. <u>U.S. shipments by type: China</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from China by type (for usage) during the specified year.

## China

Quantity (in short tons)				
Item	Calendar year 2024			
U.S. shipments for: Rigid polyurethane foams (R)				
Flexible polyurethane foams (S)				
Surface coating applications (T)				
Adhesives and sealants (U)				
Elastomers (V)				
Other known uses (W) <sup>1</sup>				
Unknown uses (X) <sup>2</sup>				
Please list the other known uses:  Please list the top five customers to which you sole know the likely ultimate end use application(s) in desce	d your firm's MDI products but for which you do not ending order of your 2024 shipments to them:			

<u>RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE AND USAGE</u>.--Please ensure that the quantities reported for U.S. shipments by product type and form (i.e., lines R, S, T, U, V, W, and X) in 2024 equal the quantities and values reported for U.S. shipments (i.e., lines F though K) in 2024. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year
Reconciliation	2024
<b>Quantity:</b> R + S + T + U + V + W + X - F - H- J = zero ("0"), if not revise.	0

II-5d. <u>U.S. imports by form: China</u>.--Report your firm's U.S. imports by form from China during the specified year.

## China

Quantity (short tons) and Value (\$1,000)			
Item	Calendar year 2024		
U.S. imports: <sup>1</sup>			
Crude polymeric MDI:			
Quantity (Y)			
Value (Z)			
Pure monomeric MDI:			
Quantity (AA)			
Value (AB)			
All other MDI products (e.g., non-pure, non-crude MDI			
derivatives) <sup>1</sup> :			
Quantity (AC)			
Value (AD)			

<sup>&</sup>lt;sup>1</sup> These products can include MDI that has been partially reacted (e.g., with itself, polyol, or polyamines) to remove some but not all isocyanates groups (e.g., homopolymer, uretonimine MDI, carbodiimide MDI, or prepolymers). Please list the specific other MDI products included in this category, in order of their commercial importance (shipment volumes): \_\_\_\_\_.

<u>RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT FORM.</u>--Please ensure that the quantities and values reported for U.S. shipments by product form (i.e., lines Y, Z, AA, AB, AC, and AD) in 2024 equal the quantities and values reported for U.S. shipments (i.e., lines F though K) in 2024. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year
Reconciliation	2024
Quantity: $Y + AA + AC - F - H - J = zero$ ("0"), if not revise.	0
<b>Value:</b> $Z + AB + AD - G - I - K = zero ("0"), if not revise.$	0

Imports from all other sources.—Report your firm's imports and your firm's shipments and inventories of MDI products imported from all other sources (i.e., sources other than China) by your firm during the specified periods.

## All other sources

Quantity (in short tons), value (in \$1,000)				
	Calendar year			
Item	2022	2023	2024	
Beginning-of-period inventories (quantity) (A)				
Imports classified under: <sup>1</sup> Primary HTS numbers <sup>2</sup> Quantity (B)				
Value (C)				
Other HTS numbers Quantity (D)				
Value (E)				
U.S. shipments: Commercial shipments: Quantity (F)				
Value (G)				
Internal consumption: <sup>3</sup> Quantity (H)				
Value³ (I)				
Transfers to related firms: <sup>3</sup> Quantity (J)				
Value³ (K)				
Export shipments: <sup>4</sup> Quantity (L)				
Value (M)				
End-of-period inventories: (quantity) (N)				
<ul> <li>Please identify the foreign producers, if known:</li> <li>The primary HTSUS statistical reporting numbers</li> <li>Internal consumption and transfers to related fir different basis for valuing these transactions in your</li> <li>However, the data provided above in this tab</li> </ul>	are 2929.10.801 ms must be value records, please s	ed at fair market value. pecify that basis (e.g., co	ost, cost plus, <i>e</i>	

<sup>&</sup>lt;sup>3</sup> Identify your firm's principal export markets:

#### II-6a. Imports from all other sources.—Continued

RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.--Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and D), less total shipments (i.e., lines F, H, J, and L). 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.

	Calendar year		
Reconciliation	2022	2023	2024
A + B + D – E – G – J – L – N= should equal zero			
("0") or provide an explanation.1	0	0	0

<sup>&</sup>lt;sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: .

II-6b. Channels of distribution: All other sources.—Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources (i.e., sources other than China) by channel of distribution during the specified periods.

## All other sources

Quantity (in short tons)			
	Calendar year		
Item	2022 2023 2024		
Channels of distribution:			
U.S. shipments:			
To distributors (O)			
To distillers and processors (P)			
To end users (Q)			

<u>RECONCILIATION OF CHANNELS.</u>--Please ensure that the quantities reported for channels of distribution (i.e., lines O through Q) in each time period equal the quantity reported for U.S. shipments (i.e., line F, H, J) 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.

	Calendar year		
Reconciliation item	2022	2023	2024
O + P + Q - F – H – J= zero ("0"), if not revise.	0	0	0

II-6c. <u>U.S. shipments by type: all other sources</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources (i.e., sources other than China) by type (for usage) during the specified year.

## All other sources

Quantity (in short tons)		
ltem	Calendar year 2024	
U.S. shipments for:		
Rigid polyurethane foams (R)		
Flexible polyurethane foams (S)		
Surface coating applications (T)		
Adhesives and sealants (U)		
Elastomers (V)		
Other known uses (W) <sup>1</sup>		
Unknown uses (X) <sup>2</sup>		
<sup>1</sup> Please list the other known uses:		
<sup>2</sup> Please list the top five customers to which you sol	d your firm's MDI products but for which you do not	
know the likely ultimate end use application(s) in desce	ending order of your 2024 shipments to them:	

<u>RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE AND USAGE</u>.--Please ensure that the quantities reported for U.S. shipments by product type and form (i.e., lines R, S, T, U, V, W, and X) in 2024 equal the quantities and values reported for U.S. shipments (i.e., lines F though K) in 2024. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year
Reconciliation	2024
<b>Quantity:</b> R + S + T + U + V + W + X - F - H- J = zero ("0"), if not revise.	0

II-6d. <u>U.S. imports by form: all other sources</u>.--Report your firm's U.S. imports by form from all other sources (i.e., sources other than China)during the specified year.

## All other sources

)
Calendar year 2024

<sup>&</sup>lt;sup>1</sup> These products can include MDI that has been partially reacted (e.g., with itself, polyol, or polyamines) to remove some but not all isocyanates groups (e.g., homopolymer, uretonimine MDI, carbodiimide MDI, or prepolymers). Please list the specific other MDI products included in this category, in order of their commercial importance (shipment volumes): \_\_\_\_\_.

<u>RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT FORM.</u>--Please ensure that the quantities and values reported for U.S. shipments by product form (i.e., lines Y, Z, AA, AB, AC, and AD) in 2024 equal the quantities and values reported for U.S. shipments (i.e., lines F though K) in 2024. 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.

Calenda	
Reconciliation	2024
Quantity: $Y + AA + AC - F - H - J = zero$ ("0"), if not revise.	0
<b>Value:</b> $Z + AB + AD - G - I - K = zero ("0"), if not revise.$	0

II-6e. <u>U.S. imports by share: All other sources</u>.--Report your firm's in-scope MDI products imports from all other sources (i.e., sources other than China) by type during the specified periods.

## All other sources

Quantity (in short tons) and Value (in \$1,000s of dollars)		
Item	Calendar year 2024	
	MDI products from nonsubject sources	
U.S. imports of MDI products:		
Belgium		
Quantity (AE)		
Value (AF)		
Germany		
Quantity (AG)		
Value (AH)		
Spain		
Quantity (AI)		
Value (AJ)		
South Korea		
Quantity (AK)		
Value (AL)		
All other sources		
Quantity (AM)		
Value (AN)		

<u>RECONCILATION OF U.S. IMPORTS FROM ALL OTHER SOURCES.</u>—Please ensure that the quantities and values reported in this question (i.e. lines AE through AN across all columns) equal the quantity and values reported for U.S. imports (i.e. lines F through K) for 2024 in question II-6a. If 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 2024
Quantity: $AE + AG + AI + AK + AM - F - H - J =$ zero ("0"), if not revise.	0
Value: $AF + AH + AJ + AL + AN - G - I - K = zero$ ("0"), if not revise.	0

II-7a. Out-of-scope imports under the primary HTS statistical reporting numbers.--Report your firm's imports of products other than MDI products that are classified under the primary HTS numbers (i.e., 2929.10.8010 and 3909.31.0000) from any source during the specified period.

# Out-of-scope products imported under primary HTS statistical reporting numbers

Quantity (in short tons); Va	lue ( <i>in \$1,000</i> )		
	Calendar year		
Item	2022	2023	2024
Out-of-scope imports under primary HTS statistical reporting numbers <sup>1</sup> from China:			
Quantity			
Value			
All other sources: <sup>2</sup> Quantity			
Value			
Value  1 Please describe the products being imported: 2 Please list sources:			

II-7b. Monthly U.S. imports: Imports of out-of-scope imports under the primary HTS numbers.-Report your firm's imports of products other than MDI products that are classified under the primary HTS numbers (i.e., 2929.10.8010 and 3909.31.0000) from the specified source during the specified period (February 2024 through January 2025).

# Out-of-scope products imported under primary HTS statistical reporting numbers

		Quantity (in short tons)		
Year	Month	China	All other sources	
2024	February			
	March			
	April			
	May			
	June			
	July			
	August			
	September			
	October			
	November			
	December			
2025	January			

<u>Transfers to related firms</u> If your firm reported transfers to related firms in any of the data tables in Part II, 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) and whether the transfers were priced at market value or by a non-market formula.
Other explanationsIf your firm would like to further explain a response to a question in Part II for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

#### PART III.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Economist (202-xxx-xxxx, NAME@usitc.gov).

III-1.	<b>Contact information.</b> 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	

#### **PRICE DATA**

- III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2022 of the following products your firm imported from China:
  - Product 1.-- Polymeric MDI, 150-250 centipoise viscosity at 25o C, 30.2-32.5
    Isocyanate content in weight percentage, basic commodity grade (e.g., PM-200, PM-200S, Papi 27, Isobind 1088, Lupranate M20, Rubinate 1840, Rubinate M), sold in bulk (e.g., trucks, rail car, ISO tanks, isotainer).
  - Product 2.-- Polymeric MDI, 150-250 centipoise viscosity at 25o C, 30.2-32.5
    Isocyanate content in weight percentage, basic commodity grade (e.g., PM-200, PM-200S, Papi 27, Isobind 1088, Lupranate M20, Rubinate 1840, Rubinate M), sold in packages (e.g., totes, drums).
  - **Product 3.--** Polymeric MDI, 585-900 centipoise viscosity at 25o C, 30.3-32.0 Isocyanate content in weight percentage, basic commodity grade (e.g., PM-700, Papi 580N, Lupranate M70, Rubinate 1850), sold in bulk (e.g., trucks, rail car, ISO tanks, isotainer).

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

III-2a.	During January 2022-December 2024, did your firm import from China and sell to unrelated U.S.
	customers any of the above listed products (or any products that were competitive with these
	products)?

YesPlease complete the following pricing data table as appropriate.
NoSkip to question III-3.

III-2b. <u>Price data</u>.--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from China and sold by your firm.

## China

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

	Product 1		Product 2		Product 3	
Period of shipment	Quantity	Value	Quantity	Value	Quantity	Value
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						
October-December						

<sup>&</sup>lt;sup>1</sup> 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.

Product 3:

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

description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.
Product 1:
Product 2:

<sup>&</sup>lt;sup>2</sup> Pricing product definitions are provided on the first page of Part III.

III-2c. <u>Price data checklist.</u>--Please check that the pricing data in question III-2a have been correctly reported.

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

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

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U.S.	IIIIDOLLEIS	Questionnane.	- IVIDI PIUUULIS	(Premimaly

III-3.	Price settingHow does your firm determine the prices that it charges for sales of MDI products
	(check all that apply)?

ransaction by ransaction	Contracts	Set price lists	Other	If other, describe
	l —			

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe

III-5. **Pricing terms.**--On what basis are your firm's prices of imported MDI products from China usually quoted *(check one)*?

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

III-6. <u>Contract versus spot.</u>— Approximately what shares of your firm's sales of its MDI products from China in 2024 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

ltem	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	<b>Spot sales</b> (for a single delivery)	Tota (shou sum t 100.09	ld :o
Share of 2024 sales	%	%	%	%	0.0	%

III-7. <u>Contract provisions.</u>--Please fill out the table regarding your firm's typical sales contracts for MDI products imported from China (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

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 No. day			365					
Price renegotiation (during contract period)	Yes							
	No							
	Quantity							
Fixed quantity and/or price	Price							
3.1.5, 5.1 p.1.55	Both							
Indexed to raw	Yes							
material costs <sup>1</sup>	No							
Not applicable								
<sup>1</sup> Please identify the in	idexes used:	<sup>1</sup> Please identify the indexes used:						

III-8. <u>Lead times.</u>-- What share of your firm's sales of its MDI products imported from China 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 imported MDI products?

Source	Share of 2024 sales	Lead time (Average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

прогсе	is Questionnaire – <b>Wibi Products (Preliminary)</b>		Page
<u>Ship</u>	ping information.—		
(a)	Who generally arranges the transportation to your firm Your firm Purchaser (check one)	's customers'	locations?
(b)	When your firm sells MDI products imported from Chin Point of importation Storage facility (check one)	-	is it shipped?
(c)	Indicate the approximate percentage of your firm's sale from China that are delivered the following distances fr shipment.	•	•
	Distance from your firm's U.S. point of shipment	Share	
	Within 100 miles	%	
	101 to 1,000 miles	%	
	Over 1,000 miles	%	
	Total (should sum to 100.0%)	0.0 %	
	graphical shipmentsIn which U.S. geographic market area lucts imported from subject countries since January 1, 2022  Geographic area		
No	ortheast.–CT, ME, MA, NH, NJ, NY, PA, RI, and VT.		
Mi	dwest.–IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.		
So	utheast.–AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, ar	nd WV.	
Ce	ntral SouthwestAR, LA, OK, and TX.		

	Central Southwest.—AR, LA, OR, and TX.		l
	Mountains.—AZ, CO, ID, MT, NV, NM, UT, and WY.		
	Pacific Coast.–CA, OR, and WA.		
	<b>Other</b> .—All other markets in the United States not previously listed, including AK, HI, PR, and VI.		
III-11.	<u>Inland transportation costs.</u> —What is the approximate percentage of the comported from China that is accounted for by U.S. inland transportation cost	•	

III-12. <u>End uses.</u>--List the end uses of the MDI products that your firm imports. For each end-use product, what percentage of the <u>total cost</u> is accounted for by MDI products and other inputs?

	Share of total cost	Total	
		(should sum to	
End-use product	MDI products Other inputs		100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

III-13.	3. <u>Substitutes</u> Can other products be substituted for MDI products?							
	☐ No	YesPlease fill out t	he tab	le.				
		End use in which this	На		ranges in the price of this substitute cted the price for MDI products?			
	Substitute	substitute is used	No	Yes	Explanation			
1.								
2.								
3.								
3.								

III-14. <u>Demand trends.</u>-- Has demand within the United States and outside of the United States (if known) for MDI products steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2022? Explain any trends and describe the principal factors that have affected these changes in demand.

Select one box per row.

Market	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explanation and factors
Within the United States						
Outside the United States						

U.S. Im	porters' Qu	estionnair	re – MDI Products (Preliminary) Page 29
III-15.	•		ave there been any significant changes in the product range, product mix or oducts since January 1, 2022?
	No	Yes	If yes, please describe.
III-16.			the MDI products market subject to business cycles, either during the year es, describe.
	No	Yes	If yes, please describe, including any changes since January 1, 2022.
III-17.	•	to MDI pr	etitionIs the MDI products market subject to conditions of competition oducts other than the business cycles described in the previous question? If
	No	Yes	If yes, please describe, including any changes since January 1, 2022.

<b>U.S.</b> Importers	' Questionnaire – MDI Produ	cts (Preliminary)
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III-18.	Supply	constraints.	_
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(a) Has your firm refused, declined, or been unable to supply MDI products at any time since January 1, 2022 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

No (skip to III-19)	Yes (respond to part b)

(b) For each year that your firm faced supply constraints, check yes and describe the constraints with the details requested below.

Check if yes	Period	Description: include the timing, duration, and reason for the constraint.
	2022	
	2023	
	2024	

III-19. <u>Raw materials</u>.-- Have MDI products raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2022?

Select one box per row.

Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how raw material price changes have affected your firm's selling prices for MDI products.

III-20. <u>Interchangeability.</u>—How often are MDI products produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

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

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	Other countries
United States		
China		

For any country-pair producing MDI products that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of MDI products produced in the countries:

III-21. Factors other than price.—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between MDI products produced in the United States and in other countries a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	Other countries
United States		
China		

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

III-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 MDI products market in the United States,
	including any effects on MDI products cost, price, supply, and/or demand, since January 1,
	2022?

Yes	No	Don't know					
If yes, please describe the impact on cost, price, supply, and/or demand, and include the timing of such impacts.							

U.S. Importer	3' Questionnaire – MDI Products	(Preliminary
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III-24 <u>Customer identification.</u>--List the names and contact information for your firm's 10 largest U.S. customers for MDI products since January 1, 2022. Indicate the share of the quantity of your firm's U.S. shipments of MDI products that each of these customers accounted for in 2024.

Cu	istomer's name	Contact person	Email	Telephone	City	State	Share of 2024 sales (%)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

III-25.	for which a nar explanation in t	ionsIf your firm rative response bo the space provide viding the data in	ox was not prov d below. Please	ided, please n	ote the question	number	and the

#### PART IV.—ALTERNATIVE PRODUCT INFORMATION

Further information on this part of the questionnaire can be obtained from Lawrence Jones (202-205-3358, <a href="mailto:lawrence.jones@usitc.gov">lawrence.jones@usitc.gov</a>).

- IV-1. Comparability of alternative products.-- For each of the following indicate whether listed MDI products are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.
  - F: fully comparable or the same, i.e., have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

0: no familiarity with products.

(a) <u>Physical Characteristics and End Uses</u>.--The differences and similarities in the physical characteristics and end uses.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>physical characteristics and uses</i> :
MDI products <b>vs.</b> toluene di-isocyanate (TDI)		

(b) <u>Interchangeability</u>.--The ability to substitute the products in the same application.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>interchangeability</u> :
MDI products <b>vs.</b> toluene di-isocyanate (TDI)		

(c) <u>Channels of distribution</u>.--Channels of distribution/market situation through which the products are sold (i.e., sold direct to end users, through wholesaler/distributors, etc.).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>channels of distribution</i> :
MDI products <b>vs.</b> toluene di-isocyanate (TDI)		

### IV-1. Comparability of alternate products.--Continued

F: fully comparable or the same, i.e., have no differentiation between them;

M: mostly comparable or similar;

S: somewhat comparable or similar;

N: never or not-at-all comparable or similar; or

0: no familiarity with products.

(d) <u>Manufacturing facilities, production processes, and production employees</u>.--Whether manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <u>manufacturing facilities</u> , <u>production</u> <u>processes</u> , <u>and production employees</u> :
MDI products <b>vs.</b> toluene di-isocyanate (TDI)		

(e) <u>Customer and producer perceptions</u>.--Perceptions as to the differences and/or similarities in the market (*e.g.*, sales/marketing practices).

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>customer and producer perceptions</i> :
MDI products <b>vs.</b> toluene di-isocyanate (TDI)		

(f) **Price**.--Whether prices are comparable or differ between the products.

Product-pair	Comparison	Please provide a narrative discussion for the comparability ratings you provided in terms of their <i>price</i> :
MDI products <b>vs.</b> toluene di-isocyanate (TDI)		

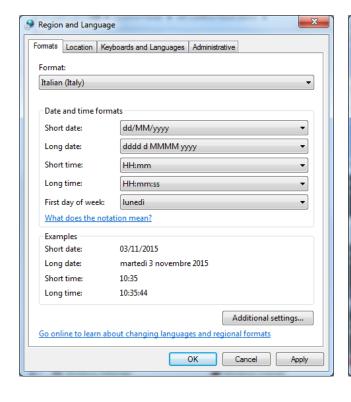
Correcting valid number error messages.--If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (i.e., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in the numeric form fields. This issue stems from your computer's number formatting setting (i.e., 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 and other countries use the reverse where multiples of 1000 are delineated with periods (".") and fractions less than one are delineated with commas (","). The U.S. International Trade Commission's questionnaires are set-up in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU or other country number formatting, we believe this may cause this issue.

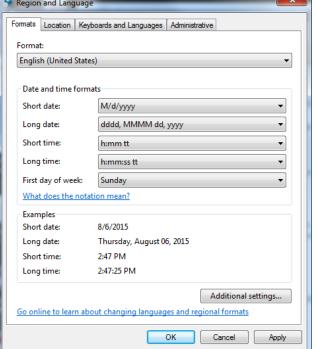
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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 importer questionnaire form. When you finish reporting the data then you can close the questionnaire and switch back to Italy (or 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 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: <a href="https://usitc.gov/qportal">https://usitc.gov/qportal</a> Pin: MDIP Phase: Preliminary

• E-mail.— E-mail the MS Word questionnaire to <u>lawrence.jones@usitc.gov</u>; 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 import this product**, please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission's secure submission portal or email.

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