

U.S. PRODUCERS' QUESTIONNAIRE

BRAKE DRUMS FROM CHINA AND TURKEY

This questionnaire must be received by the Commission by **March 31, 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 brake drums from China and Turkey (Inv. Nos. 701-TA-729-730 and 731-TA-1698-1699 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm _____

Address _____

City _____ State _____ Zip Code _____

Website _____

Has your firm produced brake drums (as defined on next page) in the United States at any time since January 1, 2022?

☐ **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: **BRAKE** / Phase: **Final**). 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.-- This proceeding was instituted in response to a petition filed on June 20, 2024, by Webb Wheel Products, Inc., Cullman, Alabama. 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 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/8208/investigation/8632>

Brake drums covered by this proceeding are defined as follows:

The merchandise covered by these investigations is certain brake drums made of gray cast iron, whether finished or unfinished, with an actual or nominal inside diameter of 14.75 inches or more but not over 16.6 inches, weighing more than 50 pounds. Unfinished brake drums are those which have undergone some turning or machining but are not ready for installation. Subject brake drums are included within the scope whether imported individually or with non-subject merchandise (for example, a hub), whether assembled or unassembled, or if joined with non-subject merchandise. When a subject drum is imported together with non-subject merchandise, such as, but not limited to, a hub-drum assembly, only the subject drum is covered by the scope.

Subject merchandise also includes finished and unfinished brake drums that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the subject brake drums. The inclusion, attachment, joining, or assembly of non-subject merchandise with subject drums either in the country of manufacture of the subject drum or in a third country does not remove the subject drum from the scope. The scope of these investigations does not include any products already covered by the antidumping and countervailing duty orders on certain chassis and subassemblies thereof from the People's Republic of China (A-570-135; C-570-136).

The scope also excludes composite brake drums that contain more than 40 percent steel by weight, while certain brake drums that meet the above criteria and that contain 40 percent or less steel by weight are within the scope.

Brake drums are currently imported under statistical reporting number 8708.30.5020 of the Harmonized Tariff Schedule of the United States ("HTSUS"). They may also be imported under HTSUS statistical reporting number 8708.30.5090 when combined with a hub to form an assembly. 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, and/or purchaser 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.

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

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

Hours	Dollars

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

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

- I-1b. **TAA information release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, contact person's title, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

☐ Yes ☐ No

- I-2a. **Establishments covered.**--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

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

Establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discussion on establishments consolidated in this questionnaire: _____.			

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

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

Law firm:	
Lead attorney(s):	

- I-3. **Petitioner status.**--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

- I-4. **Petition support.**--Does your firm support or oppose the petition?

Country	Investigation type	Support	Oppose	Take no position
China	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Turkey	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-5. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

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

Firm name	Country	Extent of ownership (percent)

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

- 1-6. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing brake drums from China and/or Turkey into the United States or that are engaged in exporting brake drums from China and/or Turkey to the United States?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-7. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of brake drums?

☐ No ☐ Yes--List the following information.

[illegible]

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Mary Messer (202-205-3193, mary.messer@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-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of brake drums since January 1, 2022.

<i>Check as many as appropriate.</i>		<i>If checked, please describe the nature, timing / duration, and impact on operations of any such reported changes as well as the business reasons for them; leave completely blank if not applicable</i>
<input type="checkbox"/>	Plant openings	
<input type="checkbox"/>	Plant closings	
<input type="checkbox"/>	Prolonged shutdowns	
<input type="checkbox"/>	Production curtailments	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Weather-related or force majeure events	
<input type="checkbox"/>	Other (e.g., revised labor agreements, technology)	

- 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 brake drums, 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 brake drum capacity" – The level of production of in-scope brake drums (see definition on p. 2) 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 brake drums based on the actual product mix experienced over the period.

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

Takes into account	Installed overall capacity	Practical overall capacity	Practical brake drum 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 brake drums	No	No	Yes

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

Item	Quantity (in units)		
	Calendar year		
	2022	2023	2024
Capacity measures:			
Installed overall capacity ¹			
Practical overall capacity ^{1 2}			
Practical brake drum capacity ^{3 4}	0	0	0
Production of:			
Brake drums ^{3 4}	0	0	0
Other out-of-scope products: Composite/steel brake drums ⁵			
Other products ⁶			
Subtotal, all out-of-scope products	0	0	0
Total production using same machinery or workers ¹	0	0	0

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

² Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" overall capacity and "practical" overall capacity.

³ Data for this indicator will populate here once reported below in question II-8.

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

⁵ Out-of-scope composite/steel brake drums are brake drums that otherwise match the definition of in-scope (cast iron) brake drums (defined on p. 2), but contain more than 40 percent steel by weight.

⁶ 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 production 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 brake drums.

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- II-4. **Product shifting.**--

- (a) Is your firm able to switch production (capacity) between brake drums 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 brake drum 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 brake drum capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical brake drum 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 brake drum 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. **Tolling.**--Since January 1, 2022, has your firm been involved in a toll agreement regarding the production of brake drums?

"Toll agreement"-- Agreement between two firms whereby the first firm ("tollee") furnishes the raw materials and the second firm ("toller") uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	If yes—Please complete the table below.

Does your firm act as the toller or tollee in this arrangement?	Toller: <input type="checkbox"/>	Tollee: <input type="checkbox"/>
Report the share of your firm's production of brake drums that was included in this toll arrangement in 2024.	%	
Please describe the activities performed in this tolling arrangement:		
Please indicate the name(s) of the firm(s) involved:		

II-7. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce brake drums in and/or admit brake drums into a foreign trade zone (FTZ)?

"Foreign trade zone" is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yes--Describe the nature of your firm's operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

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

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

- II-8. **Production, shipments, and inventory data.**--Report your firm's practical capacity, production, shipments and inventories of domestically produced brake drums during the specified periods.

Report data for only the brake drums included in the scope (see definition on page 2). For in-scope brake drums attached to out-of-scope merchandise (e.g., hub-drum assemblies), report shipment quantities and values of the in-scope brake drum attached (i.e., not the value of the entire assembly).

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

"Commercial U.S. shipments" –Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

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

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

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

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

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

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

II-8. Production, shipment, and inventory data.--Continued

Quantity (in units) and value (in \$1,000)			
Item	Calendar year		
	2022	2023	2024
Practical brake drum capacity¹ (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production (quantity) (C)			
U.S. shipments:			
Commercial shipments:			
Quantity (D)			
Value (E)			
Internal consumption:²			
Quantity (F)			
Value ² (G)			
Transfers to related firms:²			
Quantity (H)			
Value ² (I)			
Export shipments:³			
Quantity (J)			
Value (K)			
End-of-period inventories (quantity) (L)			
¹ Report your firm's practical brake drum capacity consistent with the definitions and instructions included in question II-3a. ² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value. ³ Identify your firm's principal export markets: _____.			

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

Reconciliation	Calendar year		
	2022	2023	2024
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.			

- II-9. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced brake drums by channel of distribution during the specified periods.

"Truck OEM" -- original equipment manufacturers that purchase brake drums as first-fit production parts to be installed on new trucks.

"Trailer OEM" -- original equipment manufacturers that purchase brake drums as first-fit production parts to be installed on new trailers.

"OEM aftermarket" -- original equipment manufacturers that purchase brake drums as replacement parts to be installed on vehicles (trucks or trailers).

"Independent aftermarket" -- aftermarket suppliers that are unaffiliated with original equipment manufacturers that purchase brake drums to supply replacement brake drums to dealers, end users, or independent warehouse distributors.

Quantity (in units) and value (in \$1,000)			
Item	Calendar year		
	2022	2023	2024
Channels of distribution:			
U.S. shipments to:			
Truck OEM:			
Quantity (M)			
Value (N)			
Trailer OEM:			
Quantity (O)			
Value (P)			
OEM aftermarket:			
Quantity (Q)			
Value (R)			
Independent aftermarket:			
Quantity (S)			
Value (T)			

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

Reconciliation	Calendar year		
	2022	2023	2024
Quantity: M + O + Q + S - D - F - H = zero ("0"), if not revise.	0	0	0
Value: N + P + R + T - E - G - I = zero ("0"), if not revise.	0	0	0

- II-10. **U.S. shipments pursuant to pallet and non-pallet sales.**--Report the quantity of your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced brake drums during the specified periods pursuant to pallet and non-pallet sales.

"Pallet sales" – sales made pursuant to higher volumes of 16 or more brake drums. May also be referred to as "bulk sales."

"Non-pallet sales" – sales made pursuant to lower volumes of less than 16 brake drums.

Quantity (in units) and value (in \$1,000)			
Item	Calendar year		
	2022	2023	2024
U.S. shipments:			
Brake drums shipped pursuant to pallet sales:			
Quantity (U)			
Value (V)			
Brake drums shipped pursuant to non-pallet sales:			
Quantity (W)			
Value (X)			

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

Reconciliation	Calendar year		
	2022	2023	2024
Quantity: U + W - D - F - H = zero ("0"), if not revise.	0	0	0
Value: V + X - E - G - I = zero ("0"), if not revise.	0	0	0

- II-11. **U.S. shipments by weight category.**--Report the quantity of your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced brake drums during calendar year 2024 by weight category.

Quantity (in units)	
Item	Calendar year 2024
U.S. shipments:	
Greater than 50 pounds but less than 97 pounds (Y)	
Greater than or equal to 97 pounds but less than or equal to 106 pounds (Z)	
Greater than 106 pounds but less than or equal to 113 pounds (AA)	
Greater than 113 pounds (AB)	

***RECONCILIATION OF US SHIPMENTS BY WEIGHT.**--Please ensure that the quantities reported for U.S. shipments by weight category (i.e., lines Y through AB) in calendar year 2024 equal the quantity reported for U.S. shipments (i.e., line D, F, H) in calendar year 2024. If the calculated fields below return quantities other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.*

Reconciliation	Calendar year 2024
$Y + Z + AA + AB - D - F - H = \text{zero ("0")}$, if not revise.	0

- II-12. **U.S. shipments of brake drums shipped within larger (e.g., hub-drum) assemblies.**--Report the quantity of your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced brake drums that are shipped as part of larger (e.g., hub-drum) assemblies during calendar year 2024. Report only the quantity and value of the shipments relating to the brake drum itself (i.e., exclude the quantity and value of the out-of-scope components or hub to which the brake drums are attached).

Quantity (<i>in units</i>) and value (<i>in \$1,000</i>)	
Item	Calendar year 2024
U.S. shipments:	
Brake drums shipped as part of a larger (e.g., hub-drum) assembly: ¹ Quantity (AC)	
Value (AD)	
All other brake drums (i.e., not shipped as part of a larger assembly): ² Quantity (AE)	0
Value (AF)	0
<p>¹ Describe the out-of-scope components contained in the larger assemblies that includes both in-scope merchandise (i.e., brake drums) and other out-of-scope components (e.g., hubs in hub-drum assemblies) that your firm shipped and indicate the average number of brake drums included in such larger assemblies: _____. Please also indicate the total value of the larger assembly, inclusive of the value of the embodied brake drums reported above in line AD and the value of the excluded out-of-scope components to which they were attached (i.e., line AD should be a subset of this value) (in 1,000 dollars): _____.</p> <p>² Please ensure that the quantity and value of "Brake drums shipped part of a larger assembly" (i.e., lines AC and AD) are not larger than your firm's overall U.S. shipments (i.e., lines D through I in question II-8). If the data in the lines for "All other brake drums" are resulting in negative numbers, this indicates that your firm likely misreported something because your reported data in either lines AC or AD are larger than your firm's overall shipments in question II-8. If this is the case, please review your firm's data and revise as appropriate to fix your firm's reporting.</p>	

- II-13. **Employment data.**--Report your firm's employment-related data related to the production of brake drums in your U.S. establishments during the specified periods and provide an explanation for any trends in these data.

"Production and Related Workers" (PRWs) includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12.

"Hours worked" includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

"Wages paid" --Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar year		
	2022	2023	2024
Average number of PRWs (<i>number</i>)			
Hours worked by PRWs (<i>1,000 hours</i>)			
Wages paid to PRWs (<i>\$1,000</i>)			

Explanation of trends:

- II-14. **Transfers to related firms.**--If your firm reported transfers to related firms in question II-8, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-15. **Purchases.**--Has your firm purchased brake drums produced in the United States or in other countries since January 1, 2022? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

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

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

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

Note: If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below

(Quantity in units)			
Item	Calendar year		
	2022	2023	2024
Purchases from U.S. importers of brake drums from—			
China			
Turkey			
Subject sources	0	0	0
All other sources ¹			
Purchases from domestic producers²			
Purchases from other sources³			
Purchases from all sources	0	0	0
¹ Please list the name of the nonsubject importer(s) from which your firm purchased this product: _____. ² Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. ³ Please list the name of the firm(s) from which your firm purchased this product: _____.			

[illegible]

II-16. **Purchases of imports from subject sources.**--Continued.

RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES.--Please ensure that the quantities reported for your firm's purchases of imports from subject sources reported in this question (i.e., "total purchases of imports from subject sources") in each time period equal the quantity reported for your firm's purchases from subject sources in each time period in the previous question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year		
	2022	2023	2024
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0

II-17. **Imports.**--Since January 1, 2022, has your firm imported brake drums?

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

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

II-18. **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.

--

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Joanna Lo (202-205-1888, joanna.lo@usitc.gov).

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

Name	
Title	
Email	
Telephone	

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

- A.1. When does your firm's fiscal year end (month and day)? _____
If your firm's fiscal year changed since January 1, 2022, explain below:

- A.2. Note: Calendar-year data are required for the annual-year financial data in this section (i.e., in questions III-9a, III-9d, III-12a, and III-13a). However, if providing this data on a calendar-year basis is unduly burdensome or provides results that are not reliable, fiscal-year based data are acceptable. Please indicate whether the results in this section are provided on a calendar-year basis (including firms with a calendar-year based fiscal year) or on a fiscal-year basis that does not align with the calendar year.

☐ Calendar-year basis ☐ Fiscal-year basis (does not align with the calendar year)

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include brake drums:

- B.2. Does your firm prepare profit/loss statements for brake drums:

☐ Yes ☐ No

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

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

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

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

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

--

III-4a. **Product listing.**—Please list the products your firm produces in the facilities in which it produces brake drums and provide the share of net sales accounted for by these products in 2024.

Products	Share of sales in 2024
Brake drums	%
	%
	%
	%
	%

III-4b. **In-scope product mix.**—Provide an estimate of the number of unique stock keeping units ("SKUs") of brake drums produced and sold by your firm.

Item	Years		
	2022	2023	2024
Brake drums (in actual number of SKUs, ranges are acceptable)			
If the number of SKUs fluctuated materially, explain the primary cause and the impact on revenue and cost:			

- III-4c. **Out-of-scope products sold at the same facility.**—Did your firm report reported sales of out-of-scope product(s) at the same production facility (listed in questions I-2a and III-4a)?

No	Yes	If yes, explain how these sales of nonsubject were generated at the same facility (e.g., different production lines for each product, the same equipment and/or workers as brake drums, same facility but different buildings, etc.):
<input type="checkbox"/>	<input type="checkbox"/>	

- III-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of brake drums from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

☐ Yes--Continue to question III-6. ☐ No--Continue to question III-8a.

- III-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of brake drums that your firm purchases from related suppliers and that are reflected in question III-9a. For "Share of total COGS" please report this information by relevant input for 2024.

Input	Related supplier	Share of total COGS in 2024
		%
		%
		%
		%

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

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

- III-7b. **Valuation method used for inputs from related suppliers.**—Please confirm that the inputs purchased from related suppliers, as identified in III-6, were reported in III-9a (financial results on brake drums) in a manner consistent with the firm's accounting books and records.

Yes	No	If no—Provide an explanation and the valuation basis used for these inputs in question III-9a.
<input type="checkbox"/>	<input type="checkbox"/>	

III-8. **Cost assignment/allocation basis.**—Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for brake drums in the normal course of business and in the financial results reported in question III-9a (e.g., actual costs, standard costs, percentage of COGS, percentage of sales, etc.).

(a) **INTEGRATED** (your firm produces castings for the production of brake drums):

Cost/expense	Assignment/allocation bases used for brake drums—	
	In the normal course of business	In the financial results at III-9a
Raw materials (include all COGS items to make castings at your firm's foundry)		
Other raw materials		
Direct labor (non-foundry)		
Energy and utilities (non-foundry)		
Other factory costs (non-foundry)		
SG&A expenses		
Interest expense		
Other income/expenses		

(b) **NON-INTEGRATED** (your firm purchases castings to produce of brake drums):

Cost/expense	Assignment/allocation bases used for brake drums—	
	In the normal course of business	In the financial results at III-9a
Raw materials (purchased castings)		
Other raw materials		
Direct labor		
Energy and utilities		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		

- III-9a. **Operations on brake drums.**—Report the revenue and related cost information requested below on the brake drum operations of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing operations. Do not report any revenue or cost data related to the resale of purchased product.

Net sales—Report all commercial sales, internal consumption, and transfers to related firms, whether these are domestic sales or exports. Report net sales values less discounts, returns, allowances, and prepaid freight, in U.S. dollars, f.o.b. your point of shipment. The freight costs associated with delivering the product to your customer should not be included.

Note: If the financial data are reported on a calendar-year basis, the total net sales quantities and values should match the total shipment quantities and values reported in Part II of this questionnaire (see question III-14 for a reconciliation grid).

Internal consumption—Product consumed internally by your firm. Report internal consumption at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

Transfers to related firms—Sales made to related firms. Report transfers to related firms at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

Costs and expenses—Include costs and expenses associated with all reported net sales (i.e., for both domestic and export commercial sales, internal consumption, and transfers to related firms). If any freight costs were removed from net sales values, ensure the associated costs are removed from the applicable cost/expense line.

Inputs from related suppliers—Any inputs purchased from related suppliers should be reported in a manner consistent with your firm's accounting books and records.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes brake drums, as well as specific statements and worksheets) used to compile these data.

III-9a. Operations on brake drums.—

If you have a tolling arrangement (as a tollee or a toller), contact Joanna Lo at joanna.lo@usitc.gov before continuing to fill out this questionnaire.

Quantity (in units) and value (in \$1,000)			
Item	Years		
	2022	2023	2024
Net sales quantities:			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales quantities	0	0	0
Net sales values:			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
Cost of goods sold (COGS):			
Raw materials costs ¹	0	0	0
Direct labor (non-foundry)			
Energy and utilities (non-foundry)			
Other factory costs (non-foundry)			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
SG&A expenses			
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	0

¹ Raw materials costs should be reported in III-9b inclusive of the direct labor, energy/utilities, and factory overhead costs associated with any internally produced castings.

III-9b. **Raw materials.**—Provide a breakout of the relevant components of relevant components of total raw material costs reported in question III-9a.

Value (in \$1,000)			
Item	Years		
	2022	2023	2024
Raw material costs:			
<u>Internally produced brake drum castings recognized in III-9a:</u>			
Pig iron cost			
All other foundry material inputs ¹			
Direct labor (foundry operations)			
Energy and utility costs (foundry operations)			
All other factory costs (foundry operations)			
Cost of internally produced brake drum castings	0	0	0
<u>Purchased or imported brake drum castings recognized in III-9a:</u>			
From related suppliers			
From unrelated suppliers			
Cost of externally procured brake drum castings	0	0	0
<u>All other (non-foundry related) material inputs²</u>			
¹ List the notable “other” foundry operation raw materials used and provide the share (%) of total raw material costs accounted for by each notable “other” raw material: _____.			
² List the notable “other” non-foundry operation raw materials used and provide the share (%) of total raw material costs accounted for by each notable “other” raw material: _____.			

- III-9c. **Financial data reconciliation.**-- Certain line items from question III-9a, including total net sales quantities and values, total COGS, gross profit (or loss), operating profit (or loss), and net income (or loss), have been calculated based on the data submitted for other line items. Are the data in these calculated line items correct according to your firm's financial records ignoring non-material differences that may arise due to rounding?

		<p>If no--If the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise.</p> <p>Also, check signs accorded to the post operating income line items. The two expense line items should report positive numbers (i.e., expenses are positive, and incomes or reversals are negative in these lines – instances of the latter should be rare in these lines). The income line item should also, in most instances, be a positive number (i.e., income is positive, and expenses or reversals are negative in this line).</p> <p>If, after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated line items persist, please identify and discuss the differences in the space below.</p>
Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	

- III-9d. **Financial data checklist.**--

Confirm the following with regard to the financial data reported in question III-9a:	✓ if Yes
In actual units?	<input type="checkbox"/>
In \$1,000 dollars (not actual dollars)?	<input type="checkbox"/>
Net sales values (CS, IC, and/or Transfers) exclude freight costs associated with delivering the product to your customer(s), i.e., reflect f.o.b. values from your point of shipment?	<input type="checkbox"/>
Net sales values (CS, IC, and/or Transfers) exclude all discounts, returns, allowances, and prepaid freight.	<input type="checkbox"/>
Cost items (e.g., materials, labor, other factory costs, and/or SG&A) exclude freight costs associated with delivering the product to your customer(s)?	<input type="checkbox"/>
Cost associated with warehousing and/or storage are removed from "other factory costs"?	<input type="checkbox"/>
Warehousing and/or storage are reported within SG&A expenses only and allocated to include costs for the in-scope product?	<input type="checkbox"/>
Cost of packaging materials related to shipping the in-scope product to customers are removed from "other factory costs"?	<input type="checkbox"/>
Packaging materials related to shipping the in-scope product to customers are reported within SG&A expenses only?	<input type="checkbox"/>
If you did not ✓ Yes in any of the boxes above, go back to III-9a and revise your responses.	

III-9e. **Explanation of trends.**—Indicate the primary decisions, events, or factors that impacted the trends in the following metrics reported in question III-9a. For “average unit sales values” (calculated from net sales quantities and values), include information that may have impacted per unit sales and costs (e.g., product mix variations, patented product).

Metric in III-9a	Explanation of trends from 2022 to 2024
Net sales quantity	
Net sales values	
Average sales unit values (calculated)	
INTEGRATED PRODUCER’S raw material (castings) – Steel making costs (e.g., foundry grade steel, basic pig iron, cast scrap, silicon carbide, ferrosilicon, ferromanganese, coke, graphite, limestone, etc.) and conversion costs to make castings used in brake drums	
NON-INTERGRATED PRODUCER’S raw material costs (castings not produced by your firm)	
Other raw materials (not castings)	
Direct labor costs	
Energy and utilities	
Other factory costs	
SG&A costs	
Other expenses and income	

- III-9f. **Brake drums variable and fixed costs.**—For total COGS and total SG&A expenses reported for the most recently completed annual period in table III-9a, please estimate the share of variable and fixed costs for each category, with the sum adding to 100 percent. The specified variable and fixed cost shares should be representative of the relevant range of production that the company could achieve under current capacity constraints.

Item	Share of 2024: COGS (percent)	Share of 2024: SG&A (percent)
Share of costs that are:--		
Variable	%	%
Fixed	%	%
Total (should sum to 100.0%)	0.0 %	0.0 %

- III-9g. **Regulations and standards of brake drums on costs.**—Since January 1, 2022, have regulations and/or standards related to brake drums sold in the United States materially impacted your firm's costs and profitability?

--

- III-9h. **Castings procurement (not produced by your firm).**—Since January 1, 2022, describe any difficulties (e.g., supply shortages and cost increases) experienced by your firm in procuring castings to produce brake drums.

--

- III-9i. **Depreciation expense.**—Please report the amount of depreciation expense that is included within the reported financial results at question III-9a.

Item	Years		
	2022	2023	2024
Depreciation expense (<i>in \$1,000</i>)			

- III-9j. **Depreciation expense classification.**—Please indicate the line item(s) within question III-9a (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.

--

III-10a. **Nonrecurring items (charges and gains) included in the brake drum financial results.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question III-9a. If a nonrecurring item that is not product-specific was allocated to the results at question III-9a, please report the allocated value, below, rather than the aggregate amount.

Note: The Commission's objective here is to gather information on material (significant) nonrecurring items which impacted the reported financial results for brake drums in question III-9a.

Item	Years		
	2022	2023	2024
	Value (\$1,000)		
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

III-10b. **Nonrecurring items (charges and gains) included in the brake drum financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

	Description of the nonrecurring item	Location (i.e., line item) within question III-9a
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**—If non-recurring items were reported in question III-10a above, please identify where your company recorded these items in your accounting books and records in the normal course of business, just as responses to question III-10a identify the specific line items in question III-9a where these items are reported.

--

III-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of brake drums. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for brake drums in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations used in question III-9a.

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

Value (in \$1,000)			
Item	Years		
	2022	2023	2024
Total assets (net)			

III-12b. **Description of asset values.**—Please provide explanations for any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) included in the above response.

--

III-13a. **Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and research and development expenses for brake drums.

Value (in \$1,000)			
Item	Years		
	2022	2023	2024
Capital expenditures			
R&D expenses			

III-13b. **Description of reported capital expenditures.**—Please describe the nature, focus, and significance of your firm’s reported capital expenditures. If no capital expenditure data were reported, please explain the reason.

--

III-13c. **Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm’s reported R&D expenses.

--

III-14a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question III-9a should reconcile with the total shipments reported in question II-8 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis.

If the calculated fields below return values other than zero (i.e., "0") this indicates the total net sales quantities and values do not match the total shipments quantities and values.

Reconciliation	Years		
	2022	2023	2024
Quantity: Trade data from question II-8 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
Value: Trade data from question II-8 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

Is the financial data in question III-9a reported on a calendar-year basis?

☐ Yes— Complete question III-14b.

☐ No— Continue to question III-15.

III-14b. **Data consistency and reconciliation (calendar-year based financial data).**—Do the data in question III-9a reconcile with the data in question II-8 (i.e., the calculated fields are returning zeros in the table above) for all periods?

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

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

III-15. **Effects of imports on investment.**—Since January 1, 2022, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of brake drums from China and/or Turkey?

No	Yes	If yes, my firm has experienced actual negative effects as follows:
<input type="checkbox"/>	<input type="checkbox"/>	

	<i>(check as many as appropriate)</i>	<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

- III-16. **Effects of imports on growth and development.**—Since January 1, 2022, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of brake drums from China and/or Turkey?

No	Yes	If yes, my firm has experienced actual negative effects as follows:
<input type="checkbox"/>	<input type="checkbox"/>	

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

- III-17. **Anticipated effects of imports.**—Does your firm anticipate any negative effects due to imports of brake drums from China and/or Turkey?

No	Yes	If yes, my firm anticipates negative effects as follows:
<input type="checkbox"/>	<input type="checkbox"/>	

- III-18. **Other explanations.**—If your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Pamela Davis (202-205-2218, Pamela.Davis@usitc.gov).

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

Name	
Title	
Email	
Telephone	

PRICE DATA

- IV-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 produced by your firm.

Product 1.-- Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than or equal to 97 pounds and less than or equal to 106 pounds. *Do not include drums sold or imported as part of an assembly or finished good.*

Product 2.-- Brake drums designed with a 16.5 inch nominal braking surface for a 7 inch wide brake shoe, with an 8.78 inch nominal mounting pilot diameter, and a final machined weight greater than 106 pounds but not greater than 113 pounds. *Do not include drums sold or imported as part of an assembly or finished good.*

Please note that values should be f.o.b., U.S. point of shipment 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).

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

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

IV-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm. Report separately for sales to OEMs and to the aftermarket (both OEM aftermarket and independent aftermarket).

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

(Quantity in units, value in dollars)								
Period of shipment	Sales to OEMs				Sales to aftermarket			
	Product 1		Product 2		Product 1		Product 2	
	Quantity	Value	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								

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

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

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

Product 1 (OEM): _____.

Product 2 (OEM): _____.

Product 1 (aftermarket): _____.

Product 2 (aftermarket): _____.

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

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

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

--

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

- IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of brake drums (check all that apply)?

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-5. **Pricing terms.**--On what basis are your firm's prices of domestic brake drums usually quoted (check one)?

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-6. **Contract versus spot.**--Approximately what shares of your firm's sales of its U.S.-produced brake drums in 2024 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

Item	Type of sale				Total (should sum to 100.0%)
	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	
Share of 2024 sales	%	%	%	%	0.0 %

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced brake drums (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 duration	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
¹ Please identify the indexes used: _____.				

IV-8. **Lead times.**--What share of your firm's sales of its U.S.-produced brake drums was from inventory and produced to order, and what was the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced brake drums?

Source	Share of 2024 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9. **Shipping information.**--

- (a) Who generally arranges the transportation to your firm's customers' locations?
☐ Your firm ☐ Purchaser (*check one*)
- (b) Indicate the approximate percentage of your firm's sales of brake drums that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

- IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced brake drums since January 1, 2022 (check all that apply)?

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

- IV-11. **Inland transportation costs.**--What is the approximate percentage of the cost of U.S.-produced brake drums that is accounted for by U.S. inland transportation costs? _____ percent

- IV-12. **End uses.**--List the end uses of the brake drums that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by brake drums and other inputs?

End-use product	Share of total cost of end use product accounted for by		Total (should sum to 100.0% across)
	Brake drums	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-13. **Substitutes.**--Can other products be substituted for brake drums?

☐ No ☐ Yes--Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for brake drums?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

IV-14. **Demand trends.**-- Has demand within the United States and outside of the United States (if known) for brake drums 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:						
Overall market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Truck OEM market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Trailer OEM market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
OEM aftermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Independent aftermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of brake drums since January 1, 2022?

No	Yes	If yes, please describe and quantify if possible.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-16. **Business cycles.**--Is the brake drum market subject to business cycles, either during the year or across years? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2022.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-17. **Conditions of competition.**--Is the brake drum market subject to conditions of competition distinctive to brake drums other than the business cycles described in the previous question? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2022.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Supply constraints.**--

- (a) Has your firm refused, declined, or been unable to supply brake drums 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 IV-19)	Yes (respond to part b)
<input type="checkbox"/>	<input type="checkbox"/>

- (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.
<input type="checkbox"/>	2022	
<input type="checkbox"/>	2023	
<input type="checkbox"/>	January 1- June 20, 2024	
<input type="checkbox"/>	Since June 20, 2024	

- IV-19. **Raw materials.**-- Have brake drum 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 brake drums.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-20. **Interchangeability.**—How often are brake drums 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 O 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

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

Country-pair	China	Turkey	Other countries
United States			
China			
Turkey			
For any country-pair producing brake drums that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of brake drums produced in the countries:			

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

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	China	Turkey	Other countries
United States			
China			
Turkey			
For any country-pair for which factors other than price are <i>always</i> or <i>frequently</i> a significant factor in your firm's sales of brake drums, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:			

- IV-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 brake drum market in the United States, including any effects on brake drum cost, price, supply, and/or demand, since January 1, 2022?

Yes	No	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

IV-23. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for brake drums since January 1, 2022. Indicate the share of the quantity of your firm's U.S. shipments of brake drums that each of these customers accounted for in 2024.

	Customer's name	City	State	Share of 2024 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

IV-24. **Competition from imports.--**

- (a) **Lost revenue.**--Since January 1, 2022: To avoid losing sales to competitors selling brake drums from China and/or Turkey, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

- (b) **Lost sales.**--Since January 1, 2022: Did your firm lose sales of brake drums to imports of this product from China and/or Turkey?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

- IV-25. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV 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.

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HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

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

Please do not attempt to modify the format or permissions of the questionnaire document. Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission of further instructions.

- **Upload via Commission’s secure submission portal.**— 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: <https://usitc.gov/qportal> **Pin:** BRAKE **Phase:** Final

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

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

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