FOREIGN PRODUCERS'/EXPORTERS' 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.

Name of firm						
Address						
Website						
Has your firm produced or export	ed brake drums (as defined on next pa	age) 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	YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)					
Data reported in this question	naire relate to (Check one):					
	China	☐ Turkey				
https://usitc.gov/qportal. (PIN	: BRAKE / Phase: Final). See last p CERTIFICATION					
and belief and understand that the i certification I also grant consent for	nformation submitted is subject to au the Commission, and its employees a	aire is complete and correct to the best of my knowledge dit and verification by the Commission. By means of this and contract personnel, to use the information provided in injury proceedings conducted by the Commission on the				
proceeding or other proceedings m personnel (a) for developing or mai reviews, and evaluations relating to	ay be disclosed to and used: (i) by the control of this or a relation of this or a relation of the control of the programs, personnel, and operatives and contract personnel, solely for the control of t	se to this request for information and throughout this he Commission, its employees and Offices, and contract ted proceeding, or (b) in internal investigations, audits, ions of the Commission including under 5 U.S.C. Appendix or cybersecurity purposes. I understand that all contract				
Name of Authorized Official	Title of Authorized Official	Date				
Signature	Phone	Email address				

PART I.—GENERAL INFORMATION

<u>Background</u>.--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 drum-hub 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, purchaser and/or foreign producer questionnaire), you need not respond to duplicated questions.

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 Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as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

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

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 Mary Messer (202-205-3093, mary.messer@usitc.gov).

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

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 30 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

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

questionna		eredProvide the name and address of establishment(s) covered by this
involved in conjunctio than one e	the prod n with (w stablishm	ach facility of a firm in the country specified on the certification page uction or export of brake drums, including auxiliary facilities operated in hether or not physically separate from) such facilities. Firms operating more ent in the country specified on the certification page should combine the ments into a single report.
a firm that that was so jointly own	solely or olely or joned, mana	rm that your firm solely or jointly owned, managed, or otherwise controlled; jointly owned, managed, or otherwise controlled your firm; and/or a firm intly owned, managed, or otherwise controlled by a firm that also solely or ged, or otherwise controlled your firm. -Does your firm or any related firm produce, have the capability to produce, produce brake drums in the United States or other countries?
No	Yes	If yes, please name the firm(s) and country(ies) below and, if U.S. producer(s), ensure that they complete the Commission's producer questionnaire.
		<u>ers</u> Does your firm or any related firm import or have any plans to import e United States?
brake drun	ns into th	If yes, please name the firm(s) below and ensure that they complete the
No Stock syml 1-4 are pub symbol (inc	Yes bol informolicly tradecluding August 200.	If yes, please name the firm(s) below and ensure that they complete the Commission's importer questionnaire. nation If your firm or any of the entities reported in questions I-2 throughed in the United States, please specify the stock exchange and trading merican Depository Receipts, if applicable): f your firm or parent firm is represented by external counsel in relation to
No Stock syml 1-4 are pub symbol (incesting process)	Yes bol informolicly tradecluding Areacteding, pleased.	If yes, please name the firm(s) below and ensure that they complete the Commission's importer questionnaire. nation If your firm or any of the entities reported in questions I-2 throughed in the United States, please specify the stock exchange and trading merican Depository Receipts, if applicable):
No Stock syml 1-4 are pub symbol (incention proceed) Law firm	Yes bol informolicly tradecluding Areacteding, pleased.	If yes, please name the firm(s) below and ensure that they complete the Commission's importer questionnaire. nation If your firm or any of the entities reported in questions I-2 throughed in the United States, please specify the stock exchange and trading merican Depository Receipts, if applicable): f your firm or parent firm is represented by external counsel in relation to

I-7. <u>U.S. importers</u>.--Please provide the names, contacts, telephone numbers, and e-mail addresses of the <u>TEN</u> largest U.S. importers of your firm's brake drums since January 1, 2022.

	Importer's name	Contact person	Email	Telephone	Share of your firm's 2024 U.S. exports (%)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

PART II.--TRADE AND RELATED INFORMATION

Email Telephone

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.		rmationPlease identify the responsible individual and the manner by which staff may contact that individual regarding the confidential information submitted
	Name	
	Title	

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of brake drums since January 1, 2022.

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

II-2b.	Anticipated changes in operationsDoes your firm anticipate any changes in the character of
	its operations or organization (as noted above) relating to the production of brake drums in the
	future?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.

II-3a. <u>Production using same machinery.</u>--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 <u>not</u> take into account other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and cleanup. 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 brake drums 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 establishment(s) in the country specified on the certification page, 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

Quantity (in units)				
	Calendar year			
Item	2022	2023	2024	
Capacity measures: Installed overall capacity ¹				
Practical overall capacity ¹²				
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	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.

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

Hours per week	Weeks per year

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

³ Data entered in question II-9 for this indicator will populate here.

⁴ Data reported for practical 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: _____.

fii w re bi	rm's pere be eporte eporte ut wa	practical overall capacity over the peri inding over different periods reported ed practical overall capacity. If a const	e describe the constraint(s) that set the limit(s) on your od reported in question II-3a. If different constraints I, please specify when each constraint was limiting your raint was not actually binding over the period reported, talled capacity level, indicate at what level it would have
		traint k as many as appropriate)	Description (If checked, please describe the details, timing, and durated of the constraint; leave completely blank if not applicable.)
		Production bottlenecks	
		Existing labor force	
		Supply of material inputs	
		Fuel or energy	
		Storage capacity	
		Logistics/transportation	
		Other constraints (list the specific constraints in the description field)	
aı pı	nd the	e additional actions that would be nee	describe and quantify the amount of time it would take eded (e.g., hiring new workers, expanding shifts, ply, etc.) for your firm to be able to fully utilize the n II-3a.

Product sh	nifting	
		able to switch production (capacity) between brake drums and other produme equipment and/or labor?
		If yes—(i.e., have produced other products or are able to produce other
No	Yes	products) Please identify other actual or potential products.
No	Yes	products) Please identify other actual or potential products.

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

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

Note: If your firm is not able to answer "yes" to any of the above criteria as it relates to your firm's reported capacity levels, please revise your capacity numbers to be in conformance with the appropriate definition prior to submission to the Commission.

- II-6. **Share of sales.**--What percentage of your firm's total sales in its most recent fiscal year was represented by sales of brake drums? _____ percent.
- II-7a. <u>Firm's estimated share of production in China or Turkey</u>.--Please estimate the percentage of total production of brake drums in the country specified on the certification page accounted for by your firm's production in 2024. _____ percent.
- II-7b. <u>Firm's estimated share of exports from China or Turkey.</u>—Please estimate the percentage of total exports to the United States of brake drums from the country specified on the certification page accounted for by your firm's exports in 2024. _____ percent.
- II-8. <u>Third country trade actions</u>.--Are the brake drums exported by your firm subject to antidumping/countervailing duty/safeguard findings, remedies, or proceedings?

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

II-9. <u>Trade data</u>.--Report your firm's capacity, production, shipments, and inventories related to the production of brake drums in your establishment(s) in the country specified on the certification page during the specified periods. Do not include resales of brake drums that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-10.

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

<u>Do not submit data on multiple countries combined</u>. The establishments reported here should all be located in the country of the firm's address reported on the certification page. Multinational companies with production in multiple subject countries should submit separate foreign producer questionnaire responses for each subject country.

"Shipments"--Shipments of products produced in your establishment(s) in the country specified on the certification page. Quantities reported should be net of returns.

"Home market commercial shipments"--Shipments, other than internal consumption and transfers to related firms, within the country specified on the certification page.

"Home market internal consumption/transfers to related firms"--Shipments made to related firms in the country specified on the certification page, including product consumed internally by your firm.

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

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

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

II-9. <u>Trade data</u>.--*Continued*.

	Qı	uantity (<i>in unit</i>	s)				
	Act	tual experience	Projections ¹				
	Calendar year						
Item	2022	2023	2024	2025	2026		
Practical brake drum capacity ² (A)							
Beginning-of-period inventories (B)							
Production ² (C)							
Home market shipments: Internal consumption/ transfers (D)							
Commercial shipments (E)							
Export shipments: to the United States (F)							
to all other markets (G) ³							
Total exports (H)	0	0	0	0	0		
Total shipments (I)	0	0	0	0	0		
End-of-period inventories (J)							

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

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

II-9. <u>Trade data</u>.--Continued.

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

	А	ctual experienc	Projections			
	Calendar year					
ltem	2022	2023	2024	2025	2026	
B + C – D – E – F –G – J = should equal						
zero ("0") or provide an explanation.1	0	0	0	0	0	
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless						
accurate: .						

II-10. Exports to the United States not produced by your firm.--Report your firm's exports to the United States of brake drums that were produced in the country specified on the certification page but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-9.

Proje	Projections		
Calendar year			
2025	2026		
	ear		

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

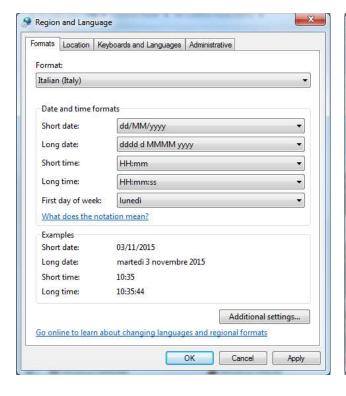
Correcting Valid number error messages. --If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields.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

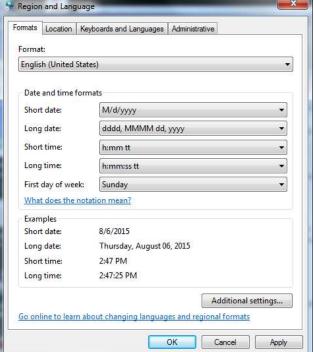
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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

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

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





HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://usitc.gov/reports/active import injury questionnaires.

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

• <u>Upload via Commission's secure submission portal</u>.— The questionnaire must be uploaded in two formats: (1) a Microsoft Word 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 did not produce or export this product, please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission's secure submission portal or email.

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