

U.S. PRODUCERS' QUESTIONNAIRE

HOT-ROLLED STEEL PRODUCTS FROM CHINA, INDIA, INDONESIA, TAIWAN, THAILAND, AND UKRAINE

This questionnaire must be received by the Commission by **May 15, 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 review of the countervailing duty orders concerning hot-rolled steel from India, Indonesia, China, Taiwan, Thailand, and Ukraine and the antidumping duty orders concerning hot-rolled steel from India, Indonesia, and Thailand (Inv. Nos. 701-TA-405-406 and 408 and 731-TA-899-901 and 906-908 (Fourth Review)). 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 hot-rolled steel (as defined on the next page) at any time since January 1, 2019?

☐ **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: **STEEL**, Phase: **Review**). 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 or reviews 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.-- On November 29, 2001, the Department of Commerce ("Commerce") issued antidumping duty orders on imports of hot-rolled steel from China, Thailand, Taiwan, and Ukraine. On December 3, 2001, Commerce issued antidumping duty orders on imports of hot-rolled steel from India and Indonesia and countervailing duty orders on imports of hot-rolled steel from India, Indonesia and Thailand. On July 1, 2024, the Commission instituted these reviews pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the orders will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the orders. 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/1491/investigation/8591>

Hot-rolled steel covered by this proceeding is hot-rolled steel of a rectangular shape, with a width of 0.5 inch or greater, neither clad, plated, nor coated with metal and whether or not painted, varnished, or coated with plastics or other non-metallic substances, in coils (whether or not in successively superimposed layers), regardless of thickness, and in straight lengths, of a thickness of less than 4.75 mm and of a width measuring at least 10 times the thickness. Universal mill plate (*i.e.*, flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm, but not exceeding 1250 mm, and of a thickness of not less than 4 mm, not in coils and without patterns in relief) of a thickness not less than 4.0 mm is not included within the scope of these *Orders*.

Specifically included within the scope of these *Orders* are vacuum degassed, fully stabilized (commonly referred to as interstitial-free (IF)) steels, high strength low alloy (HSLA) steels, and the substrate for motor lamination steels. IF steels are recognized as low carbon steels with micro-alloying levels of elements such as titanium or niobium (also commonly referred to as columbium), or both, added to stabilize carbon and nitrogen elements. HSLA steels are recognized as steels with micro-alloying levels of elements such as chromium, copper, niobium, vanadium, and molybdenum. The substrate for motor lamination steels contains micro-alloying levels of elements such as silicon and aluminum.

Steel products included in the scope of the *Orders*, regardless of definitions in the Harmonized Tariff Schedule of the United States (HTSUS), are products in which: (i) iron predominates, by weight, over each of the other contained elements; (ii) the carbon content is 2 percent or less, by weight; and (iii) none of the elements listed below exceeds the quantity, by weight, respectively indicated:

- 1.80 percent of manganese, or
- 2.25 percent of silicon, or
- 1.00 percent of copper, or
- 0.50 percent of aluminum, or
- 1.25 percent of chromium, or
- 0.30 percent of cobalt, or
- 0.40 percent of lead, or
- 1.25 percent of nickel, or
- 0.30 percent of tungsten, or
- 0.10 percent of molybdenum, or
- 0.10 percent of niobium, or
- 0.15 percent of vanadium, or
- 0.15 percent of zirconium.

All products that meet the physical and chemical descriptions provided above are within the scope of the *Orders* unless otherwise excluded. The following products, by way of example, are outside or specifically excluded from the scope of the *Orders*:

- Alloy hot-rolled steel products in which at least one of the chemical elements exceeds those listed above (including, 3, American Society for Testing and Materials (ASTM) specifications A543, A387, A514, A517, A506).
- Society of Automotive Engineers (SAE)/American Iron & Steel Institute (AISI) grades of series 2300 and higher.
- Ball bearings steels, as defined in the HTSUS.
- Tool steels, as defined in the HTSUS.
- Silico-manganese (as defined in the HTSUS) or silicon electrical steel with a silicon level exceeding 2.25 percent.
- ASTM specifications A710 and A736.
- USS Abrasion-resistant steels (USS AR 400, USS AR 500).
- All products (proprietary or otherwise) based on an alloy ASTM specification (sample specifications: ASTM A506, A507)
- Non-rectangular shapes, not in coils, which are the result of having been processed by cutting or stamping and which have assumed the character of articles or products classified outside chapter 72 of the HTSUS

Hot-rolled steel is currently imported under statistical reporting numbers 7208.10.1500, 7208.10.3000, 7208.10.6000, 7208.25.3000, 7208.25.6000, 7208.26.0030, 7208.26.0060, 7208.27.0030, 7208.27.0040, 7208.27.0045, 7208.27.0060, 7208.36.0030, 7208.36.0060, 7208.37.0030, 7208.37.0060, 7208.38.0015, 7208.38.0030, 7208.38.0090, 7208.39.0015, 7208.39.0020, 7208.39.0025, 7208.39.0030, 7208.39.0090, 7208.40.6030, 7208.40.6060, 7208.53.0000, 7208.54.0000, 7208.90.0000, 7211.14.0090, 7211.19.1500, 7211.19.2000, 7211.19.3000, 7211.19.4500, 7211.19.6000, 7211.19.7530, 7211.19.7560, and 7211.19.7590 of the Harmonized Tariff Schedule of the United States (HTSUS).

Certain hot-rolled carbon steel flat products covered by the *Orders*, including vacuum degassed fully stabilized, high strength low alloy, and the substrate for motor lamination steel, may also enter under the following tariff numbers: 7225.11.0000, 7225.19.0000, 7225.30.3050, 7225.30.7000, 7225.40.7000, 7225.99.0090, 7226.11.1000, 7226.11.9030, 7226.11.9060, 7226.19.1000, 7226.19.9000, 7226.91.5000, 7226.91.7000, 7226.91.8000, and 7226.99.0000. Subject merchandise may also enter under 7210.70.3000, 7210.90.9000, 7211.14.0030, 7212.40.1000, 7212.40.5000, and 7212.50.0000. Although the HTSUS numbers are provided for convenience and customs purposes, the written product description remains dispositive.

Reporting of information.—If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates. If your firm is completing more than one questionnaire in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions in the questionnaires.

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

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 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-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 hot-rolled steel, 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. **Position regarding continuation of order.**--Does your firm support or oppose continuation of the following antidumping and/or countervailing duty order currently in place for hot-rolled steel?

Country	Order type	Support	Oppose	Take no position
China	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indonesia	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indonesia	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Taiwan	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ukraine	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-4. **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.

- I-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing hot-rolled steel into the United States or that are engaged in exporting hot-rolled steel to the United States?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of hot-rolled steel?

☐ 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 Caitlyn Costello (202-205-2058, Caitlyn.Costello@usitc.gov). **Supply all data requested on a calendar-year basis.**

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

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of hot-rolled steel since January 1, 2019.

<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-2b. **COVID-19 pandemic.**—Has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, production, employment, and shipments relating to hot-rolled steel in January 1, 2019? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations.

No	Yes	If yes, describe these changes including the impact over time on the (a) supply chain, (b) production and shipments, and (c) employment with respect to hot-rolled steel.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-2c. **Anticipated changes in operations.**—Does your firm anticipate any changes in the character of its operations or organization relating to the production of hot-rolled steel in the future?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

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

Takes into account	Installed overall capacity	Practical overall capacity	Practical hot-rolled steel 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 hot-rolled steel	No	No	Yes

"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.

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

Quantity (in short tons)					
Item	Calendar year			January-March	
	2022	2023	2024	2024	2025
Capacity measures:					
Installed overall capacity ¹					
Practical overall capacity ^{1 2}					
Practical hot-rolled steel capacity ^{3 4}	0	0	0	0	0
Production of:					
Hot-rolled steel ^{3 4}	0	0	0	0	0
Out of scope products:					
High alloy/excluded steel ⁵					
Other (i.e., out-of-scope) products: ⁶					
Subtotal, all out of scope products	0	0	0	0	0
Total production using same machinery or workers	0	0	0	0	0
¹ Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period. 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-6. ⁴ Data reported for practical hot-rolled steel capacity should be greater than the data reported for production of hot-rolled steel 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 hot-rolled steel then "practical overall" and "practical hot-rolled steel" capacity measures should be equal to each other. ⁵ One or more elements exceed the limits specified in the scope on page 2 and/or the product is identified in the scope as outside or specifically excluded from the scope. 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 capacities reported in II-3a, and explain any changes in reported capacities.

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- II-3d. **Practical overall production 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 hot-rolled steel.

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- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between hot-rolled steel 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 hot-rolled steel 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 hot-rolled steel capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical hot-rolled steel 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 hot-rolled steel 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. **Production, shipments and inventory data.**--Report your firm's practical capacity, production, shipments, and inventories of domestically produced hot-rolled steel during the specified periods.

"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-6. Production, shipment, and inventory data. --Continued

Quantity (in short tons), value (in \$1,000)					
Item	Calendar year			January-March	
	2022	2023	2024	2024	2025
Practical hot-rolled steel capacity¹ (Quantity) (A)					
Beginning-of-period inventories (Quantity) (B)					
Production (C)					
U.S. shipments:					
Commercial shipments:					
Quantity (D)					
Value (E)					
Internal consumption:^{2 3}					
Quantity (F)					
Value (G) ²					
Transfers to related firms:²					
Quantity (H)					
Value (I) ²					
Export shipments:⁴					
Quantity (J)					
Value (K)					
End-of-period inventories:					
Quantity (L)					

¹ Report your firm's practical hot-rolled steel 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 Please report the share of internal consumption in 2024 your firm used for cold roll steel products (_____ percent), CORE products (_____ percent), and other products (_____ percent).

⁴ 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.

Item	Calendar year			January-March	
	2022	2023	2024	2024	2025
B + C – D – F – H – J – L = 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-7. **Historical U.S. shipment data.** --Report the quantity and value of your firm's U.S. shipments (including commercial U.S. shipments, internal consumption, and transfers, but not including exports) of hot-rolled steel produced in your U.S. establishment(s) during the specified periods.

Quantity (<i>in short tons</i>), value (<i>in \$1,000</i>)			
Item	2019	2020	2021
Historical U.S. shipments			
<i>Quantity</i>			
<i>Value</i>			

- II-8. **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 hot-rolled steel by channel of distribution during the specified periods.

Quantity (<i>in short tons</i>)					
Item	Calendar year			January-March	
	2022	2023	2024	2024	2025
Channels of distribution:					
U.S. shipments—					
to steel service centers					
and distributors (M)					
to end users (N)					

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

Reconciliation item	Calendar year			January-March	
	2022	2023	2024	2024	2025
M + N – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

- II-9. **U.S. shipments to end-users by sector.**—Report your firm's commercial U.S. shipments, internal consumption, and transfers to related firms to end users by end use sector in calendar year 2024.

Quantity (in short tons)			
Calendar year 2024			
Item	Commercial U.S. shipments	Internal consumption	Transfers to related firms
U.S. shipments to end users:			
Tubular goods (O)			
Automotive/transportation (P)			
Construction/structural (Q)			
Appliances/machinery (R)			
Other end users ¹ (S)			
¹ Identify other end user types: _____.			

RECONCILIATION OF U.S. SHIPMENTS TO END-USERS BY SECTOR.—Please ensure that the quantities reported in this question (i.e., lines O through S) in calendar year 2024 equal the quantity reported for U.S. shipments to end users (i.e., line N) in 2024 in question II-8. 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 2024
Quantity: $O + P + Q + R + S - N = \text{zero ("0")}$, if not revise.	0

- II-10. **U.S. shipments by type.**—Report your firm's commercial U.S. shipments, internal consumption, and transfers to related firms by type in calendar year 2024.

Quantity (in short tons)			
Calendar year 2024			
Item	Commercial U.S. shipments	Internal consumption	Transfers to related firms
U.S. shipments:			
Coiled plate (T)			
Coiled sheet/strip (U)			
Straight length sheet/strip (V)			

RECONCILIATION OF U.S. SHIPMENTS BY TYPE.—Please ensure that the quantities reported in this question (i.e., lines T through V) in calendar year 2024 equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in 2024 in question II-6. 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 2024
Quantity: $T + U + V - D - F - H = \text{zero ("0")}$, if not revise.	0

- II-11. **Employment data.**--Report your firm's employment-related data related to the production of hot-rolled steel in your U.S. establishments 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.

For the January to March periods, calculate similarly and divide by 3. If your firm had the same number of PRWs in all calendar year and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods.

"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			January-March	
	2022	2023	2024	2024	2025
Employment data:					
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-12. **Transfers to related firms.**--If your firm reported transfers to related firms in question II-4, 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-13. **Purchases.**--Has your firm purchased hot-rolled steel produced in the United States or in other countries since January 1, 2019? (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 short tons)					
Item	Calendar year			January-March	
	2022	2023	2024	2024	2025
Purchases from U.S. importers of hot-rolled steel from—					
China					
India					
Indonesia					
Taiwan					
Thailand					
Ukraine					
Subject sources	0	0	0	0	0
All other sources ¹					
Purchases from all other sources	0	0	0	0	0
Purchases from domestic producers²					
Purchases from other sources³					
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: _____.					

- II-14. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of hot-rolled steel from China, India, Indonesia, Taiwan, Thailand, and Ukraine at any time since January 1, 2022, report those purchases by the individual importer of record and subject source.

Purchases of subject imports

Quantity (in short tons)						
Importer of record	Subject source	Calendar year			January-March	
		2022	2023	2024	2024	2025
Grand total:		0	0	0	0	0

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			January-March	
	2022	2023	2024	2024	2025
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0	0	0

II-15. **Imports.**--Since January 1, 2019, has your firm imported hot-rolled steel?

“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-16. **Toll production.**--Since January 1, 2019, has your firm been involved in a toll agreement regarding the production of hot-rolled steel?

“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 hot-rolled steel 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-17. Foreign trade zones.--

- (a) **Firm's FTZ operations**.--Does your firm produce hot-rolled steel in and/or admit hot-rolled steel 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 firms 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 hot-rolled steel into a foreign trade zone (FTZ) for use in distribution of hot-rolled steel and/or the production of downstream articles?

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

For questions II-18 and II-19, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

- II-18. **Effect of orders.**--Describe the significance of the existing countervailing and antidumping duty orders covering imports of hot-rolled steel from China, India, Indonesia, Taiwan, Thailand, and Ukraine in terms of its effect on your firm's capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the orders.

--

- II-19. **Likely impact of revocation.**--Would your firm anticipate any changes in the character of its operations or organization, including its capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of hot-rolled steel in the future if the countervailing and antidumping duty orders on hot-rolled steel from China, India, Indonesia, Taiwan, Thailand, and Ukraine were to be revoked?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-20. **Other explanations:**--If your firm would like to explain further 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 Jennifer Brinckhaus (202-205-3188, jennifer.brinckhaus@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 has changed since January 1, 2022, explain below:

- A.2. Note: Calendar-year data are requested for the annual year periods 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, data based on a fiscal year 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 hot-rolled steel:

- B.2. Does your firm prepare profit/loss statements for hot-rolled steel?
☐ 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-4. **Product listing.**—Please list the products your firm produces in the facilities in which it produces hot-rolled steel and provide the share of 2024 commercial sales values accounted for by each.

Products	Share of 2024 commercial sales value
Hot-rolled steel	%
Cold-rolled steel	%
Coated (corrosion-resistant) steel	%
Tin mill products	%
Other:	%

- III-5. **Inputs from related suppliers.**—Does your firm purchase inputs (raw materials, labor, energy, or any services) used in the production of hot-rolled steel 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-8.

- III-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of hot-rolled steel 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 2024 COGS (in III-9a)
		%
		%
		%
		%

- 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 hot-rolled steel) in a manner consistent with the firm’s accounting books and records.

Yes	No	If no — Please explain below.
<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 hot-rolled steel 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.).

Cost/expense	Assignment/allocation bases used for hot-rolled steel—	
	In the normal course of business	In the financial results at III-9a
Raw materials		
Direct labor		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		

- III-9a. **Operations on hot-rolled steel.**—Report the revenue and related cost information requested below on the hot-rolled steel 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.

Internal consumption—Product consumed internally by your firm. Report internal consumption at the fair market value of the in-scope merchandise (i.e., hot-rolled steel) not of the downstream products it was used to produce (i.e., reported fair market value of internal consumption should reflect the value of the steel had it been sold on the open market as hot-rolled steel, even if this is not how these transactions are valued in your own books and records).

Transfers to related firms—Sales made to related firms. Report transfers to related firms at fair market value of the in-scope merchandise (i.e., hot-rolled steel). Reported fair market value of transfers to related firms should reflect the value of the steel had it been sold on the open market as hot-rolled steel, even if this is not how these transactions are valued in your own books and records.

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 hot-rolled steel, as well as specific statements and worksheets) used to compile these data.

III-9a. **Operations on hot-rolled steel.**—*Continued*

Quantity (short tons) and value (in \$1,000)					
Item	Years			January-March	
	2022	2023	2024	2024	2025
Net sales quantities:					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities	0	0	0	0	0
Net sales values:					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS):					
Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
SG&A expenses					
Operating income (loss)	0	0	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	0	0

- III-9b. **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?

		<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-9c. **Valuation methodology for non-commercial sales.**—As reported in table III-9a, please describe the methodology used to determine the fair market values of hot-rolled steel internal consumption and transfers to related firms, respectively.

Item	Methodology used to determine fair market values:
Internal consumption	
Transfers to related firms	

- III-9d. **Internal consumption and transfers to related firms.**—If the average per-short ton fair market values of your firm's reported internal consumption and transfers to related firms of hot-rolled steel differ from your firm's commercial sales of hot-rolled steel reported in question III-9a, please describe the reason(s) for the difference.

Item	Explanation:
Internal consumption	
Transfers to related firms	

III-9e. **Raw materials.**—Please report the share of total raw material costs in 2024 (as reported in III-9a) for the following raw material inputs:

Input	Share of total raw material costs (percent)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Iron ore		<input type="checkbox"/>	<input type="checkbox"/>
Scrap		<input type="checkbox"/>	<input type="checkbox"/>
Scrap substitutes		<input type="checkbox"/>	<input type="checkbox"/>
Coking coal		<input type="checkbox"/>	<input type="checkbox"/>
Anthracite coal		<input type="checkbox"/>	<input type="checkbox"/>
Steel slab		<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs ¹		<input type="checkbox"/>	<input type="checkbox"/>
Total (should sum to 100 percent)	0.0		
¹ Please describe the main inputs included within the “other material inputs” category:			

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

Item	Years			January-March	
	2022	2023	2024	2024	2025
Depreciation expense (in \$1,000)					

III-9g. **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 hot-rolled steel 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 hot-rolled steel in question III-9a.

Item	Years			January-March	
	2022	2023	2024	2024	2025
	Value (in \$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 hot-rolled steel 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.

Item	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-10 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-10 identify the specific line items in question III-9a where these items are reported.

--

III-12a. **Asset values.**—Report total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of hot-rolled steel. For asset categories that are not specific to hot-rolled steel (e.g., cash, shared machinery, etc.), please estimate this information using the most appropriate allocation method for the asset category (e.g., production, sales revenue, labor hours, etc.).

Note: Total assets should reflect the net amount of assets (i.e., after all accumulated depreciation and allowances are deducted) and should be allocated to hot-rolled steel 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 R&D expenses for hot-rolled steel.

Value (in \$1,000)					
Item	Years			January-March	
	2022	2023	2024	2024	2025
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-6 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis. The interim-period data should reconcile whether the financial data are on a calendar- or fiscal-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			January-March	
	2022	2023	2024	2024	2025
Quantity: Trade data from question II-6 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
Value: Trade data from question II-6 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

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

☐ Yes— Complete question III-14b. ☐ No— Complete question III-14c

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-6 (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"/>	

III-14c. **Data consistency and reconciliation (non-calendar-year based financial data).**—Do the data in question III-9a reconcile with the data in question II-6 (i.e., the calculated fields are returning zeros) for the January-March periods?

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

- III-15. **Effects on financial performance of COVID-19.**—Since January 1, 2022, has the COVID-19 pandemic, or any government actions taken to contain the spread of the COVID-19 virus, affected the financial performance of your firm's operations on hot-rolled steel as reported in question III-9a? In your response, please include the duration and timing of any impacts as they relate to your firm's financial performance.

No	Yes	If yes, please describe these effects.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-16. **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 Steven di Stefano (202-205-2465, steven.distefano@usitc.gov).

- IV-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 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 of the following products produced by your firm.

Product 1.-- Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, not high strength, produced to AISI-1006-1025 grade (including, but not limited to, ASTM A36), 0.187" through 0.625" in nominal or actual thickness, 40" through 72" in width.

Product 2.-- Hot-rolled carbon sheet in coils, commercial quality, SAE 1006-1015 or ASTM A1011 equivalent, not high-strength, not pickled and oiled, not temper-rolled, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Product 3.-- Hot-rolled carbon steel sheet in coils, commercial quality SAE 1006-1015 or ASTM A1011 equivalent, pickled and oiled, temper-rolled, not high strength, 0.090" through 0.171" in nominal or actual thickness, 40" to 72" in width.

Product 4.— Hot-rolled carbon steel plate in coils, as-rolled (unprocessed), not pickled or temper-rolled, in high strength low alloy qualities according to SAE J 1392, ASTM A-572/656/1011, 0.187" through 0.625" in nominal or actual thickness 40" through 72" in width.

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).

- (a) During January 2022 through March 2025, 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(s) 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 data in **short tons** and **actual dollars** (not 1,000s).

(Quantity in short tons, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	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								
2025:								
January-March								

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 the product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

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

Are the price data reported above:	√ if Yes
In actual dollars (not \$1,000) and short tons?	<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 hot-rolled steel (*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 hot-rolled steel 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 hot-rolled steel 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 hot-rolled steel (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	No. of days		365	
Price renegotiation (during contract period)	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	Quantity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs ¹	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<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 hot-rolled steel 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 hot-rolled steel?

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 hot-rolled steel that are delivered the following distances from your firm's 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 hot-rolled steel since January 1, 2019 (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 hot-rolled steel that is accounted for by U.S. inland transportation costs? _____ percent

- IV-12. **End uses.**--Have there been any changes in the end uses of hot-rolled steel since January 1, 2019 or do you anticipate any future changes?

No	Yes	If yes, explain the changes, noting when these changes occurred or are expected to occur.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-13. **Substitutes.**--Have there been any changes in the number or types of products that can be substituted for hot-rolled steel since January 1, 2019 or do you anticipate any future changes?

No	Yes	If yes, explain the changes, noting when these changes occurred or are expected to occur.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-14. **Availability of supply.**--Has the availability of hot-rolled steel in the U.S. market changed since January 1, 2019? Do you anticipate any future changes?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
Changes since January 1, 2019:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from China, India, Indonesia, Taiwan, Thailand, and Ukraine	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from China, India, Indonesia, Taiwan, Thailand, and Ukraine	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-15. **Demand trends.**-- Has demand within the United States and outside of the United States (if known) for hot-rolled steel steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2019, and how do you anticipate demand will change in the future? Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Select one box per row.

Market	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explanation and factors
Demand since January 1, 2019						
Within the United States	<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"/>	
Anticipated future demand						
Within the United States	<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-16. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of hot-rolled steel since January 1, 2019 or do you anticipate any future changes?

No	Yes	If yes, please describe, noting when these changes occurred or are expected to occur.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-17. **Business cycles.**--Is the hot-rolled steel 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, 2019.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Conditions of competition.**--Is the hot-rolled steel market subject to conditions of competition distinctive to hot-rolled steel 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, 2019.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-19. **Supply constraints.**--Has your firm refused, declined, or been unable to supply hot-rolled steel since January 1, 2019 (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, etc.)?

No	Yes	If yes, please describe, including the timing, duration, and reason for the constraint. Please also indicate if the constraint is ongoing.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-20. **War in Ukraine.**--Has the market for hot-rolled steel experienced any changes or issues related to the war in Ukraine since February 2022? Are there any changes or issues related to the war in Ukraine that your firm anticipates in the foreseeable future?

Period	No	Yes	If yes, please describe.
Since February 2022	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes/issues	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-21. **Raw materials.**-- Have hot-rolled steel raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2019, and how do you expect they will change in the future?

Select one box per row.

Raw materials prices	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 hot-rolled steel.
Changes since January 1, 2019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-22. **Price comparisons.**-- Are you aware of prices of hot-rolled steel in non-U.S. markets? If yes, please compare market prices of hot-rolled steel in U.S. and non-U.S. markets. Provide information as to time periods and regions for any price comparisons and note the sources for your market knowledge.

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

IV-26. **Factors other than price.**—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between hot-rolled steel 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

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

Country-pair	China	India	Indonesia	Taiwan	Thailand	Ukraine	Other countries
United States							
China							
India							
Indonesia							
Taiwan							
Thailand							
Ukraine							

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

- IV-27. **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 hot-rolled steel market in the United States, including any effects on hot-rolled steel cost, price, supply, and/or demand, since January 1, 2019?

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-28. **Role of section 232 measures.**—Did the measures (e.g., tariffs, quotas, etc.) on imported steel/aluminum products under section 232, or changes in the measures (such as the level, coverage, or nature of the measures), have an impact on the hot-rolled steel market in the United States, including any effects on hot-rolled steel cost, price, supply, and/or demand, since January 1, 2019?

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-29. **Role of new or modified tariffs.**--Have tariffs or proposed tariffs stemming from recent executive orders (e.g. new Canada or Mexico tariffs, new China tariffs as imposed under the International Emergency Economic Powers Act ("IEEPA"), announcement of reciprocal tariffs) impacted the hot-rolled steel market in the United States, including any effects on cost, price, supply, and/or demand since January 1, 2025?

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-30. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, 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.

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

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

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

- **Upload via Commission’s secure submission portal.**— The questionnaire must be uploaded in two formats: (1) a Microsoft Word 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:** **STEEL** **Phase:** **Review**

- **E-mail.**— *E-mail the MS Word questionnaire to Caitlyn.Costello@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.