U.S. PRODUCERS' QUESTIONNAIRE

MULTIFUNCTIONAL ACRYLATE AND METHACRYLATE MONOMERS, AND ACRYLATED BISPHENOL-A EXPOXY BASED OLIGOMERS (MAMMOs) FROM SOUTH KOREA AND TAIWAN

This questionnaire must be received by the Commission by <u>September 19, 2025</u>
See last page for instructions regarding how to file this questionnaire.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing and antidumping duty investigations concerning multifunctional acrylate and methacrylate monomers, and acrylated bisphenol-A epoxy based oligomers ("MAMMOs") from South Korea and Taiwan (Inv. Nos. 701-TA-759 and 731-TA-1740-1741 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm

Name of firm					
Address					
City			State	Zip (Code
Website					
Has your firm	n produced MAN	1MOs (as defined	on next page) ir	the United	States at any time since January 1, 2022?
□NO	(Sign the certifi	cation below and p	romptly return on	l y this page of	f the questionnaire to the Commission)
YES	(Complete all p	arts of the question	nnaire, and return	the entire que	estionnaire to the Commission)
			CERTIFICA	ΓΙΟΝ	
ertification I also g	grant consent for and throughout	the Commission,	, and its employ	ees and con	d verification by the Commission. By means of tract personnel, to use the information provide proceedings conducted by the Commission on
roceeding or othe ersonnel (a) for d views, and evalue	er proceedings m leveloping or ma ations relating to overnment emplo	nay be disclosed intaining the recontraction the programs, popees and contractions.	to and used: (i) cords of this or o ersonnel, and op ct personnel, so	by the Con related properations of	this request for information and throughout nmission, its employees and Offices, and com- oceeding, or (b) in internal investigations, au the Commission including under 5 U.S.C. Appe ersecurity purposes. I understand that all cont
ame of Authorized	d Official	Title of Autho			
		Title of Autho	orized Official		Date

PART I. GENERAL INFORMATION

Background. This proceeding was instituted in response to petitions filed on March 27, 2025, by Arkema, Inc., King of Prussia, Pennsylvania. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and dumping. 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/8275/investigation/8758

<u>MAMMOs</u> covered by this proceeding are certain multifunctional acrylate and methacrylate monomers, and acrylated bisphenol-A epoxy based oligomers (collectively, certain monomers and oligomers or CMOs) that are derived from chemical reactions involving the use of acrylic or methacrylic acid. Products within the scope are listed below and have the following Chemical Abstracts Service (CAS) numbers:

CAS Number	Description	Molecular Formula
109-16-0	Triethylene glycol	$C_{14}H_{22}O_6$
	dimethacrylate (TEGDMA)	
13048-33-4	1,6-hexanediol diacrylate	C ₁₂ H ₁₈ O ₄
	(HDDA)	
42978-66-5	Tripropylene glycol diacrylate	$C_{15}H_{24}O_6$
	(TPGDA)	
3290-92-4	Trimethylolpropane	C ₁₈ H ₂₆ O ₆
	trimethacrylate (TMPTMA)	
15625-89-5	Trimethylolpropane triacrylate	C ₁₅ H ₂₀ O ₆
	(TMPTA)	
28961-43-5	Ethoxylated trimethylolpropane	$(C_2H_4O)_n(C_2H_4O)_n(C_2H_4O)_nC_{15}H_{20}O_6$
	triacrylate (EOTMPTA)	
57472-68-1	Dipropylene glycol diacrylate	$C_{12}H_{18}O_5$
	(DPGDA)	
55818-57-0	Bisphenol-A-epichlorohydrin	$(C_{15}H_{16}O_2.C_3H_5CIO)_x.xC_3H_4O_2$
	copolymer acrylate (EPOXY	
	ACRYLATE)	

The monomers are generally known as multifunctional acrylates (MFAs) or multifunctional methacrylates (MFMAs) depending on whether the functional groups are acrylate or methacrylate. The monomers generally contain stabilizers/inhibitors, which include but are not limited to Hydroquinone, Methyl Hydroquinone, and Butylated Hydroxy Toluene. The monomers are either difunctional or trifunctional (having 2 or 3 functional groups/molecule), have viscosities of 9 to 15 centipoise (cPs) at 25 degrees Celsius (if difunctional) or 44 to 110 cPs at 25 degrees Celsius (if trifunctional), have (meth)acrylate equivalent weights (molecular weight per number of functional groups) between 99 and 158 and molecular weights between 226 and 472 grams per mol.

The acrylated bisphenol-A epoxy based oligomer is commonly referred to as epoxy acrylate or acrylated epoxy. In contrast to epoxy resin, the main characteristic of the epoxy acrylate oligomer is that it contains acrylate functional groups which make them curable by free-radical polymerization. The epoxy acrylate has a molecular weight between 508 to 536 grams per mol and a viscosity of 2400 to 3600 cPs at 65 degrees Celsius. The epoxy acrylate generally contains stabilizers/inhibitors, which include but are not limited to Hydroquinone, Methyl Hydroquinone, and Butylated Hydroxy Toluene.

Certain monomers and oligomers are subject to the scope even if an in-scope monomer or oligomer is blended or mixed with one or more other in-scope monomers or oligomers.

Certain monomers and oligomers in any blend or mixture are also subject to the scope, so long as the blend or mixture contains no less than 20 percent by weight of in-scope CMOs.

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

The scope also includes CMOs that are commingled, mixed or blended with in-scope product from sources not subject to this investigation.

Only the subject component(s) of such blends, mixtures or commingled products described above is covered by the scope of this investigation. Subject merchandise contained in a blended, mixed or commingled product described above will not have undergone a chemical reaction as a result of being blended, mixed or commingled.

Notwithstanding the above, specifically excluded from the scope are downstream products, including but not limited to, inks, coatings and overprint varnishes. For purposes of this exclusion, the downstream product requires only the application of energy to be cured, e.g., inks or varnish applied to packaging, coatings applied to wood flooring, etc. The energy source required to cure the downstream product to its substrate can be thermal, ultraviolet radiation, visible light, electron beam radiation, or infrared radiation.

MAMMOs are currently imported under statistical reporting numbers 2916.12.5050, 2916.14.2050, 3824.99.2900, 3907.29.0000 and 3907.30.0000 of the Harmonized Tariff Schedule of the United States (HTSUS). They may also be imported under HTSUS statistical reporting numbers 2916.12.1000 and 3824.99.9397. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

1,000 pounds contained MAMMOs. Report quantity for any product that is in-scope, as defined on pp. 2 to 4 of the questionnaire, including the individual MAMMOs and any blends containing at least 20% of those individually identified MAMMOs. For blends, however, only report the quantity of the individual MAMMOs contained in the blends and exclude the weight of any out-of-scope molecules or other non-MAMMO additives. Quantity data are also being asked for in terms of 1,000 pounds. This means that if your firm had, for example, two-hundred and forty thousand pounds of sales of MAMMOs (240,000 pounds) that data would be reported as "240" in the relevant form field (i.e., the quantity as measured in pounds divided by 1,000).

Reporting of information. If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

<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. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of MAMMOs and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

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

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

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 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. <u>Establishments covered</u>. 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.

"<u>Establishment</u>" — Each facility of a firm involved in the <u>production</u> of MAMMOs, 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. <u>Petitioner status</u>. Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

No	Yes

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

Country	Investigation type	Support	Oppose	Take no position
South Korea	Antidumping duty			
Taiwan	Antidumping duty			
Taiwan	Countervailing duty			

PART II. TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Junie Joseph** (202-205-3363, <u>Junie.Joseph@usitc.gov</u>). **Supply all data requested on a <u>calendar-year</u> basis**.

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

Name	
Title	
Email	
Telephone	

II-2. <u>Changes in operations</u>. Please indicate whether your firm has experienced any of the following changes in relation to the production of MAMMOs 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-3a. **Production using same machinery**. Please report your firm's production of products using the same equipment, machinery, or employees as used to produce MAMMOs, 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 MAMMOs capacity"— The level of production of MAMMOs 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 MAMMOs based on the actual product mix experienced over the period.

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

Takes into account	Installed overall capacity	Practical overall capacity	Practical MAMMOs 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 MAMMOs	No	No	Yes

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

Quantity (in 1,000 pounds)								
	(Januar	January–June					
Item	2022	2023	2024	2024	2025			
Capacity measures: Installed overall capacity ¹								
Practical overall capacity ¹²								
Practical MAMMOs capacity ^{3 4}	0	0	0	0	0			
Production of: MAMMOs ^{3 4}	0	0	0	0	0			
Out-of-scope products ⁵								
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-8.

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

⁵ Please identify these products: .

U.S. Pr	U.S. Producers' Questionnaire: MAMMOs (Final) Page 11								
II-3b.	Operating parameters. The <i>pract</i> operating parameters:	tical overall capacity reported in I	II-3a is based on the following						
	Hours per week	Weeks per year							
II-3c.	Capacity calculations. Please des overall production capacities rep	<i>5,</i>	•						

II-3d. Practical overall capacity constraints. Please describe the constraint(s) that set the limit(s) on your firm's practical overall capacity over the period reported in question II-3a. If different constraints were binding over different periods reported, please specify when each constraint was limiting your reported practical overall capacity. If a constraint was not actually binding over the period reported, but was still a constraint to achieving the installed capacity level, indicate at what level it would have been binding.

Constraint		Description (If checked, please describe the details, timing, and duration 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)	

3e.	and the ad procuring I	ditional a arger sou	everall capacity. Please describe and quantify the amount of time it would take ctions that would be needed (e.g., hiring new workers, expanding shifts, reces of raw material supply, etc.) for your firm to be able to fully utilize the acity reported in II-3a.
3f.	overall cap	acity, ple ion) woul nd (2) the	rall capacity. To the extent that your company is reporting excess installed ase report, with specificity: (1) which machines or equipment (or other elements of need to be brought back into production for your plant to operate at full especific dates on which such machines or equipment were last used by your AMMOs.
4.		our firm	able to switch production (capacity) between MAMMOs and other products me 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.
	(e.	g., time, o	ribe the factors that affect your firm's ability to shift capacity between products cost, relative price change, etc.), and the degree to which these factors enhance such shifts.

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

Item	√ if Yes
Are all three capacity measures reported based on <u>currently installed</u> <u>machinery 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 MAMMOs 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 MAMMOs capacity measures based on <i>the actual availability of material inputs</i> ?	
Do both practical overall capacity and practical MAMMOs capacity measures account for <u>normal downtime</u> , <u>maintenance</u> , <u>repair and cleanup</u> activities?	
Does the difference between practical overall capacity and practical MAMMOs 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. **Tolling**. Since January 1, 2022, has your firm been involved in a toll agreement regarding the production of MAMMOs?

"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	
		If yes, please complete the table below.

Does your firm act as the toller or tollee in this arrangement?	Tollee:			
Report the share of your firm's production of MAMMOs that was included in this toll arrangement in 2024.				
Please describe the activities performed in this tolling arrangement	::			
Please indicate the name(s) of the firm(s) involved:				

II-7. Foreign trade zones.

(a) <u>Firm's FTZ operations</u>. Does your firm produce MAMMOs in and/or admit MAMMOs 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	If yes, describe the nature of your firm's operations in FTZs and identify the specific FTZ site(s).

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

No	Yes	If yes, identify the firms and the FTZs.

II-8. **Production, shipments, and inventory data**. Report your firm's practical capacity, production, shipments, and inventories of domestically produced MAMMOs 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 <u>net values</u> (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

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

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

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

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

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

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

II-8. <u>Production, shipment, and inventory data</u>. *Continued*

Note: For in-scope blends, report only the quantity and value of the MAMMOs contained in these covered blends.

Quantity (in 1,000 pounds	contained I	MAMMOs) ar	nd value (<i>in</i> \$	\$1,000)		
	Calendar year			January–June		
Item	2022	2023	2024	2024	2025	
Practical capacity for: ¹ In-scope monomers (quantity) (A)						
In-scope oligomers (quantity) (B)						
Total practical MAMMO capacity	0	0	0	0	0	
Production of: In-scope monomers (quantity) (C)						
In-scope oligomers (quantity) (D)						
Total production of MAMMOs	0	0	0	0	0	
Beginning-of-period inventories (quantity) (E)						
U.S. shipments: Commercial shipments: Quantity (F)						
Value (G)						
Internal consumption: ² Quantity (H)						
Value² (I)						
Transfers to related firms: ² Quantity (J)						
Value² (K)						
Export shipments: ³ Quantity (L)						
Value (M)						
End-of-period inventories (quantity) (N)						

¹ Report your firm's practical MAMMOs capacity consistent with the definitions and instructions included in question II-3a.

² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, *etc.*):

[.] However, the data provided above in this table should be based on fair market value.

³ Identify your firm's principal export markets:

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

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY. Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line E), plus production (i.e., lines C and D), less total shipments (i.e., lines F, H, J, and L). Please ensure that any differences are not due to data entry errors in completing this form, but rather 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.

		Calendar year	January-June		
Reconciliation	2022	2023	2024	2024	2025
E + C + D - F - H - J - L - N =					
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-9. Channels of distribution. Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced MAMMOs by channel of distribution during the specified periods. If the end-use channel breakouts for any shipments are not known, reasonable estimates are acceptable.

Quantity (in 1,000 pounds contained MAMMOs)					
	(Calendar ye	January-June		
ltem	2022	2023	2024	2024	2025
U.S. shipments: to Distributors (O)					
to Ink manufacturers (P)					
to Varnish and coating manufacturers (Q)					
to All other end users ¹ (R)					
¹ Please list the other end user(s) to which your firm shipped this product:					

<u>RECONCILIATION OF CHANNELS</u>. Please ensure that the quantities reported for channels of distribution (i.e., lines O, P, Q, and R) in each time period equal the quantity reported for U.S. shipments (i.e., lines F, H, and J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

		Calendar year	Januar	y–June	
Reconciliation	2022	2023	2024	2024	2025
O + P + Q + R - F - H - J =					
zero ("0"), if not revise.	0	0	0	0	0

II-10. <u>U.S. shipments by MAMMOs content</u>. Report your firm's U.S. shipments of U.S.-produced MAMMOs (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by MAMMO content during the specified periods.

Item		Calendar year			January-June	
	2022	2023	2024	2024	2025	
J.S. shipments by MAMMOs content: MAMMOs sold individually, not part of a blend Quantity (S)						
Value (T)						
MAMMOs sold as part of a blend that only contains other in-scope MAMMOs Quantity (U)						
Value (V)						
Blends containing both in-scope MAMMOs and other out-of-scope inputs, with a MAMMO content =>50 but <100 percent of the blend ¹ Quantity (W)						
Value (X)						
Blends containing both in-scope MAMMOs and other out-of-scope inputs, with a MAMMO content =>20 but <50 percent of the blend ¹ Quantity (Y)						
Value (Z)						

¹ In reporting the quantities and values in blends that include both in-scope MAMMOs and out-of-scope inputs, only report the quantity and value associated with the MAMMOs included in the blends (i.e., exclude the quantity and value of the non-MAMMO content of these blends). Reasonable estimates are acceptable.

<u>RECONCILATION OF U.S. SHIPMENTS BY PRODUCT TYPE.</u>— Please ensure that the quantities (i.e. lines S, U, W, and Y) and values (i.e., lines T, V, X, and Z) reported in this question equal the quantity (i.e., lines F, H, and J) and values (i.e., lines G, I, and K) reported for U.S. shipments in question II-8. If calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year			January-June		
Reconciliation	2022	2023	2024	2024	2025	
Quantity: $S + U + W + Y - F - H - J = zero$						
("0"), if not revise.	0	0	0	0	0	
Value: T + V + X + Z – G – I – K = zero ("0"), if						
not revise.	0	0	0	0	0	

II-11. <u>Internal consumption/transfers to related firms</u>. Did your firm internally consume and/or transfer to a related firm any portion of its MAMMOs production, as reported in lines H and J of question II-8 at any point from 2022 to 2024?

No: Do not complete questions II-12 and II-13	Yes: Complete questions II-12 and II-13

II-12. <u>Captive production use.</u> Please report the quantities of your firm's internal consumption and transfers to related firms for the uses identified below. These data should reconcile with quantities reported in question II-8 (lines H and J). As a reminder, report only the MAMMOs content.

Quantity (in 1	1,000 pound	s contained l	MAMMOs)		
		Calendar year			/–June
ltem	2022	2023	2024	2024	2025
Internal consumption:					
Subsequently sold as is, i.e., as MAMMOs, whether as part of an in-scope blend, neat, or otherwise (merchandise was diverted back into the market for MAMMOs) ¹ (AA)					
Subsequently processed into out-of-scope downstream products (e.g., into a blend containing less than 20 percent MAMMOs content, or an ink, coating, or OPV) ² (AB)					
Transfers to related firms: Subsequently sold as is, i.e., as MAMMOs, whether as part of an in-scope blend, neat, or otherwise (merchandise was diverted back into the market for MAMMOs) ¹ (AC)					
Subsequently processed into out-of-scope downstream products (e.g., into a blend containing less than 20 percent MAMMOs content, or an ink, coating, or OPV) ² (AD)					

¹Please explain with additional detail:

<u>RECONCILIATION OF CAPTIVE PRODUCTION USE.</u> — The sum of the data reported above should be equal to the data reported 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.

	Calendar year			January-June	
Reconciliation	2022	2023	2024	2024	2025
Quantity: AA + AB – H = should equal zero ("0")	0	0	0	0	0
Quantity: AC + AD – J = should equal zero ("0")	0	0	0	0	0

² Please identify/describe the downstream products, and list them in order of commercial importance (highest volume first):

II-13. MAMMOs share contribution to downstream product. Did your firm or a related firm produce other downstream products using your firm's U.S.-produced MAMMOs in 2024?

No	Yes	If yes, please report the share that MAMMOs accounts for of the
		downstream product. Do not include conversion costs in your calculations.

Calendar y	year 2024	
Material inputs used in downstream production	Share of <u>value</u> accounted for in downstream product's inputs (percent) ¹	Share of the <u>quantity</u> accounted for in downstream product's inputs (percent)
MAMMOs		
All other material inputs		
Total (should sum to 100.0%)	0.0	0.0

¹Limit the share of value to just the material inputs for downstream product(s) being produced. In other words, do not include direct labor, factory overhead, or other conversion costs in the share calculation.

Explanation of trends:

II-14. **Employment data**. Report your firm's employment-related data related to the production of MAMMOs 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 June period, calculate similarly but divide the total by 6.

"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, oldage and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

	Calendar year		January-June		
Item	2022	2023	2024	2024	2025
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

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

II-16. <u>Purchases</u>. Has your firm purchased MAMMOs produced in the United States or in other countries since January 1, 2022? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

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

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

No	If yes, report such purchases in the table below and explain the reasons for your firms' purchases.

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

Calendar year January-June							
Item	2022	2023	2024	2024 2025			
Purchases from U.S. importers of MAMMOs from— South Korea							
Taiwan							
Subject sources	0	0	0	0	(
All other sources ¹							
Purchases from domestic producers ²							
Purchases from other sources ³							
Purchases from all sources	0	0	0	0	(

³ Please list the name of the firm(s) from which your firm purchased this product: _____.

II-17. Purchases of imports from subject sources. If your firm reported purchases from U.S. importers of MAMMOs from South Korea and Taiwan 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 1,000 pounds contained MAMMOs)								
		Calendar year January–June						
Importer of record	Subject source	2022	2023	2024	2024	2025		
Grand total:		0	0	0	0	0		

<u>RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES</u>. Please ensure that the quantities reported for your firms 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.

	Calendar year			January-June	
Reconciliation	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

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II-18. <u>Imports</u>. Since January 1, 2022, has your firm imported MAMMOs?

"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	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

II-19.	Other explanations. If your firm would like to further explain a response to a question in Part II						
	for which a narrative box was not provided, please note the question number and the						
	explanation in the space provided below. Please also use this space to highlight any issues your						
	firm had in providing the data in this section.						

PART III. FINANCIAL INFORMATION

		ons on this part of the questionnaire to Jennifer Catalano (202-205-2056, o@usitc.gov).						
III-1.		t information. Please identify the responsible individual and the manner by which ission staff may contact that individual regarding the confidential information submitted III.						
	Name							
	Title							
	Email							
	Teleph	one						
III-2.	Accoun	ting system. Briefly describe your firm's financial accounting system.						
	A.1.	When does your firm's fiscal year end (month and day)?						
		If your firm's fiscal year changed since January 1, 2022, explain below:						
	A.2. Note: Calendar-year data are required for the annual-year financial data in this sect (i.e., in questions III-9a, III-9d, III-12a, and III-13a). However, if providing this data of calendar-year basis is unduly burdensome or provides results that are not reliable, fiscal-year based data are acceptable. Please indicate whether the results in this seare provided on a calendar-year basis (including firms with a calendar-year based fixed) 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 whic financial statements are prepared that include MAMMOs:							
	B.2.	Does your firm prepare profit/loss statements for MAMMOs: Yes No						
	B.3.	Please indicate the type and frequency (if applicable) of financial statements prepared by your firm. Please check relevant items below.						
		Fue						

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

III-2. Accounting system. Continued

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

Accounting basis	Check one
U.S. GAAP	
IFRS	
Tax – cash	
Tax – accrual	
Other (specify):	

III-3.	<u>Cost accounting system</u> . 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 MAMMOs and provide the share of net sales accounted for by these products in 2024.

Products	Share of sales in 2024
MAMMOs	%
	%
	%
	%
	%

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III-5.	<u>Inputs from related suppliers</u> . Does your firm purchase inputs (raw materials, labor, energy, or any services) used in the production of MAMMOs from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?							
	YesCo	ontinue to	question III	-6. NoContinue to	question III-8	3.		
III-6.	that your f	irm purch	ases from re	lease identify the inputs use elated suppliers and that are port this information by rele	reflected in o	question III-9		
	Input			Related supplier		Share of to		
	•						%	
							%	
							%	
							%	
	the narrati	ve box.	Purchase co	ost valuation method		Check all t	hat apply	
	Related	supplier's		ost valuation incline				
	Cost plu							
	Negotia	ted transf	er price to a	pproximate fair market valu	ie			
	Other (specify):							
	If the mo	ethods us	ed differ by	input, please describe:				
III-7b.	purchased	from rela	ted supplier	its from related suppliers. P s, as identified in III-6, were istent with the firm's accour	reported in II	I-9a (financia		
	Yes No If no, provide an explanation and the valuation be in question III-9a.			aluation basis	s used for the	ese inputs		

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 MAMMOs 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.).

	Assignment/allocation b	pases used for MAMMOs		
Cost/expense	In the normal course of business In the financial results at			
Raw materials				
Direct labor				
Other factory costs				
SG&A expenses				
Interest expense				
Other income/expenses				

III-9a. <u>Total market operations on MAMMOs</u>. Report the revenue and related cost information requested below on the MAMMOs <u>total market</u> 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. <u>Do not</u> report any revenue or cost data related to the resale of purchased product.

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

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

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

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

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

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

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

III-9a. Total market operations on MAMMOs. Continued

Note: For in-scope blends, report only the quantity, value, and costs of the MAMMOs contained in these covered blends.

Quantity (in 1,000 pounds contained MAMMOs) and value (in \$1,000)					
	Years			January-June	
Item	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. Open market operations on MAMMOs. Report the revenue and related cost information requested below on the MAMMOs open market operations of your firm's U.S. establishment(s). Include only commercial 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.

Note: For in-scope blends, report only the quantity, value, and costs of the MAMMOs contained in these covered blends.

Quantity (in 1,000 pounds contained MAMMOs) and value (in \$1,000)							
	Years			January	January-June		
Item	2022	2023	2024	2024	2025		
Commercial sales quantities	0	0	0	0	0		
Commercial 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-9c. <u>Financial data reconciliation</u>. Certain line items from questions III-9a and III-9b, including total net sales quantities and values, total COGS, gross profit (or loss), operating profit (or loss), and net income (or loss), have been calculated based on the data submitted for other line items. Are the data in these calculated line items correct according to your firm's financial records ignoring non-material differences that may arise due to rounding?

		If noIf the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise. 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).
Yes	No	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.

account:

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

		Procurement method			
Input	Share of total raw material costs (percent)	Primarily produced by your firm	Primarily purchased by your firm		
Acrylic acid					
Bisphenol-A Epoxy					
Methacrylic acid					
Trimethylol propane					
Hexanediol					
Other MAMMOs					
Other raw material inputs ¹					
Total (should sum to 100 percent)	0.0				
¹ If there are notable or significant raw material inputs included within the "other material inputs" category, please list those here and provide the share of the total raw material costs for which they					

Additionally, please report the price of raw material inputs purchased and/or the fair market value ("FMV") of raw material inputs that your firm internally produced at the beginning (in or near January 2022) and the end of (in or near June 2025) of the data collection period. Please report these prices in dollars per pound of the input itself (these are raw material prices not per unit RM costs contained in MAMMOS that are reported above, e.g., your firm purchased/produced one pound of acrylic acid for \$2.34 in January 2022 and \$3.42 in June 2025) and discuss the reasons for the changes reported over this period.

	Price/FMV in dollars per pound		
Input	January 2022 June 2025		Reasons for the changes
Acrylic acid			
Bisphenol-A Epoxy			
Methacrylic acid			
Trimethylol propane			
Hexanediol			
Other MAMMOs			

III-9e. <u>Depreciation expense</u>. Please report the amount of depreciation expense that is included within the reported financial results at questions III-9a (total market) and III-9b (open market).

	Years		January-June		
Item	2022	2023	2024	2024	2025
Depreciation expense (in \$1,000)					
for total market operations (III-9a)					
Depreciation expense (in \$1,000)					
for open market operations (III-9b)					

III-9f.	<u>Depreciation expense classification</u> . Please indicate the line item(s) within question III-9a and					
	III-9b (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 MAMMOs total market financial results. Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question III-9a (total market). 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 <u>material (significant)</u> nonrecurring items which impacted the reported financial results for MAMMOs in question III-9a.

	Years		January–June		
Item	2022	2023	2024	2024	2025
			Value (<i>\$1,000</i>)		
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 MAMMOs financial results.—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

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

records of the company. If non-recurring items were reported in questions 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.

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

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

	Value (<i>in \$1,</i>	000)		
	Years			
Item	2022	2023	2024	
Current assets				
Long-term assets				
Total assets (net)	0	0	0	

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. <u>Capital expenditures and research and development ("R&D") expenses</u>. Report your firm's capital expenditures and research and development expenses for MAMMOs.

Value (in \$1,000)					
	Years		January	January–June	
Item	2022	2023	2024	2024	2025
Capital expenditures					
R&D expenses					

III-13b.	<u>Description of reported capital expenditures</u> . 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.	<u>Description of reported R&D expenses</u> . Please describe the nature, focus, and significance of your firm's reported R&D expenses.					

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

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

		Years		Januar	y–June
Reconciliation	2022	2023	2024	2024	2025
Quantity: Trade data from question II-8 (lines F, H, J, and L) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
Value: Trade data from question II-8 (lines G, I, K, and M) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

	(lines G, I, K, ar	data from quest nd M) less finan value data fron , = zero ("0").	cial	0	0	0	0	C
-	Is the financial	data in questio	n III-9a report	ed on a	ı calendar-ye	ear basis?		
	Yes—Com	nplete question	III-14b.	☐ No	— Completo	e question III	-14c.	
	question III-9a	ncy and reconci reconcile with ble above) <u>for a</u>	the data in que					
	Yes	No	If no, please	explain	•			
	question III-9a	ncy and reconci reconcile with anuary–June po	the data in que		-			
	Yes	No	If no, please	explain	•			

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

III-15. <u>Effects of imports on investment</u>. Since January 1, 2022, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of MAMMOs from South Korea and Taiwan?

No	Yes					
		If yes, my firm has experienced actual negative effects as follows:				
	(check	k as many as appropriate)	(please describe)			
		Cancellation, postponement, or rejection of expansion projects				
		Denial or rejection of investment proposal				
		Reduction in the size of capital investments				
		Return on specific investments negatively impacted				
		Other				

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

	•	•	
No	Yes		
		If yes, my firm has experie	nced actual negative effects as follows:
	(chec	ck as many as appropriate)	(please describe)
		Rejection of bank loans	
		Lowering of credit rating	
		Problem related to the issue of stocks or bonds	
		Ability to service debt	
		Other	

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III-17.	Anticipated effects of imports. Does your firm anticipate any negative effects due to imports o
	MAMMOs from South Korea and Taiwan?

No	Yes	If yes, my firm anticipates negative effects as follows:

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

PART IV. PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Steven di Stefano (202-205-2465, steven.distefano@usitc.gov).

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

Name	
Title	
Email	
Telephone	

PRICE DATA

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2022 of the following products produced by your firm.
 - **Product 1.** Bisphenol-A Epoxy Acrylate diluted with 40% TMPTA (Epoxy Acrylate TMPTA Blend), packed in polyethylene IBC containers (also known as totes).
 - **Product 2.** Trimethylolpropane triacrylate (TMPTA), CAS# 15625-89-5, packed in polyethylene IBC containers (also known as totes).
 - **Product 3.** Ethoxylated (3) trimethylol-propane triacrylate (written as TMP3EOTA or TMP(EO)3TA), CAS# 28961-43-5, packed in polyethylene IBC containers (also known as totes).
 - **Product 4.** Dipropylene glycol diacrylate (DPGDA), CAS# 57472-68-1, packed in polyethylene IBC containers (also known as totes).

Please note that values should be <u>f.o.b.</u>, <u>U.S.</u> 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).

Note—If your firm's product does not exactly meet the product specifications but is competitive with a specified pricing product above, provide a description of your firm's product and fill out the column for the pricing product that your product is most competitive with.

Note—Reported price data should exclude: (1) all export shipments, whether to related or unrelated firms; (2) any transfers to related firms in the United States; and (3) any internal usage/consumption by your firm in the United States.

IV-2a.	During January 2022-June 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)?

Yes: Please complete the following pricing data table as appropriate.
No: Skip to question IV-3.

IV-2b. Price data. Report below the quarterly price data for pricing products produced and sold by your firm.

Please ensure that the yearly totals (i.e., all four quarters added together across all products) for your firm's price data are equal to or less than what is reported as yearly commercial U.S. shipments in Part II (i.e., question II-8, lines F & G). This is because the quarterly commercial shipment price data requested in Part IV is only for the pricing products as defined above, whereas the commercial shipment data requested in Part II encompass all products under the scope of the investigation as defined in Part I.

Report data in actual pounds (not in 1,000 pounds) contained MAMMOs and actual dollars (not \$1,000s).

	Product 1		Product 2		Product 3		Product 4	
Period of shipment	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								
April-June								

firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred.

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

Product 1:			
Product 2:			
Product 3:			
Product 4:			

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

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

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

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

U.S. Producers'	Questionnaire:	MAMMOs	(Final)

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

Transaction by transaction	Contracts	Set price lists	Other	If other, describe

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

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

Delivere	d F.o.b.	. If f.o.b., specify point

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

	Type of sale					
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)	Spot sales (for a single delivery)	Total (should sum to 100.0%	d o
Share of 2024 sales	%	%	%	%	0.0	%

IV-7. <u>Contract provisions</u>. Please fill out the table regarding your firm's typical sales contracts for U.S.-produced MAMMOs (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	Yes							
(during contract period)	No							
	Quantity							
Fixed quantity and/or price	Price							
3.1.5/ 5.1 p.1.55	Both							
Indexed to raw	Yes							
material costs ¹	No							
Not applicable								
¹ Please identify the in	dexes used:	¹ Please identify the indexes used:						

IV-8. <u>Lead times</u>. What share of your firm's sales of its U.S.-produced MAMMOs 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 MAMMOs?

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

U.S. Pr	oducers	Questionnaire: MAMMOs (Final)		Page 46						
IV-9.	<u>Shippii</u>	Shipping information.								
	(a)	Who generally arranges the transportation Your firm Purchaser (check one)	ho 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 MAMMOs that are delivered the following distances from its production facility.									
		Distance from production facility	Share							
		Within 100 miles	%							
		101 to 1,000 miles	%							
		Over 1,000 miles	%							
		Total (should sum to 100.0%)	0.0 %							
IV-10.	Geogra	aphical shipments. In which U.S. geographic	market area(s) ha	s your firm sold its U.S						

produced MAMMOs since January 1, 2022 (check all that apply)?

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

IV-11.	Inland transportation costs. What is the approximate percentage of the	ne cost of U.Sproduced
	MAMMOs that is accounted for by U.S. inland transportation costs?	percent

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

		t of end use product ted for by	Total
End-use product	MAMMOs	Other inputs	(should sum to 100.0% across)
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

V-13.	Substitutes. Can of	her products be substituted YesPlease fill out t			Js?
		End use in which this	На		nanges in the price of this substitute etcted the price for MAMMOs?
	Substitute	substitute is used	No	Yes	Explanation
1.					
2.					
3.					

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

Select one box per row.

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

U.S. Pr	oducers' Qu	estionnair	re: MAMMOs (Final) Page 48	;
IV-15.			ive there been any significant changes in the product range, product mix, or 10s since January 1, 2022?	
	No	Yes	If yes, please describe and quantify if possible.	
IV-16.	Business co		ne MAMMOs market subject to business cycles, either during the year or describe.	
	No	Yes	If yes, please describe, including any changes since January 1, 2022.	
IV-17.		to MAMN	etition. Is the MAMMOs market subject to conditions of competition 10s other than the business cycles described in the previous question? If	
	No	Yes	If yes, please describe, including any changes since January 1, 2022.	

IV-18.	Supply	constraints.
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	Has your firm refused, declined, or been unable to supply MAMMOs at any time since January 1,
	2022 (examples include placing customers on allocation or "controlled order entry," declining to
	accept new customers or renewing existing customers, delivering less than the quantity
	promised, being unable to meet timely shipment commitments, impact from changes in
	operations listed in II-2a, etc.)?

No (skip to next question)	Yes (respond to part b)

(b) For each year that your firm faced supply constraints, describe the constraints with the details requested below. For constraints that span multiple years, check all years they exist and describe how they vary over time, if at all.

Period	Check if yes	Describe, including the timing, duration, and reason for the constraint.
2022		
2023		
2024		
January 1, 2025 - present		

(c) Were there any specific supply constraints, listed in part b or otherwise, related to the petition that was filed on March 27, 2025?

No	Yes	If yes, please describe the constraints that were related to the petition being filed.

IV-19. <u>Economic shocks</u>. Was the MAMMOs market subject to economic shocks prior to 2022 that had effects carrying over into the period of investigation? If yes, please describe these impacts in terms of supply availability, raw materials, market demand and market price.

No	Yes	If yes, please describe, including any changes prior to January 1, 2022.

U.S. Producers' Questionnaire: MAMMOs (Final	U.S.	Producers'	Questionnaire:	MAMMOs	(Final)
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IV-20. <u>Raw materials</u>. Have MAMMOs raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2022?

Select one box per row.

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

IV-21. <u>Interchangeability of sources</u>. How often is MAMMOs produced in the United States and in other sources interchangeable (i.e., can they physically be used in the same applications)?

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

- A = the products from a specified source-pair are *always* interchangeable
- F = the products are *frequently* interchangeable
- S = the products are *sometimes* interchangeable
- N = the products are *never* interchangeable
- 0 = no familiarity with products from a specified source-pair

Source-pair	South Korea	Taiwan	Other sources
United States			
South Korea			
Taiwan			

For any source-pair producing MAMMOs that are *sometimes* or *never* interchangeable, identify the source-pair and explain the factors that limit or preclude the interchangeable use of MAMMOs produced in the sources:

IV-22. Interchangeability of MAMMOs.-- Please quantify and describe how interchangeable overall the different individual chemicals included in the definition of in-scope MAMMOs are with each other (indicating as appropriate specific product pairs in that discussion), and indicate what characteristics each MAMMO might impart that make them preferrable or not for specific end users and/or end use applications, and to what extent such characteristics might be available from other in-scope MAMMOs and/or blends thereof.

Always	Usually	Sometimes	Never

Use the following space to provide any additional description:						

IV-23. <u>Factors other than price</u>. How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between MAMMOs produced in the United States and in other sources a significant factor in your firm's sales of the products?

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

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

	Other sources

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

IV-24. Role of new or modified tariffs. Have tariff announcements and tariff changes associated with Presidential actions since January 1, 2025 (e.g., changes in country or "reciprocal" tariffs, changes in section 232 coverage or level of tariffs) impacted the MAMMOs market in the United States, including any effects on price, supply, demand, and/or raw material costs?

No	Yes	Don't know

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

IV-25. <u>Customer identification</u>. List the names and contact information for your firm's 10 largest U.S. customers for MAMMOs since January 1, 2022. Indicate the share of the quantity of your firm's U.S. shipments of MAMMOs that each of these customers accounted for in 2024.

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

0.5. I I Gadeers Questionnane. Ivialivios (i inic	U.S.	Producers'	Questionnaire:	MAMMOs	Final
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IV-26.	Com	petition	from	import	ts.
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(a) <u>Lost revenue</u>. Since January 1, 2022: To avoid losing sales to competitors selling MAMMOs from South Korea and Taiwan, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) <u>Lost sales</u>. Since January 1, 2022: Did your firm lose sales of MAMMOs to imports of this product from South Korea and Taiwan?

No	Yes	

IV-27.	Other explanations. If your firm would like to further explain a response to a question in Part IV
	for which a narrative response box was not provided, please note the question number and the
	explanation in the space provided below. Please also use this space to highlight any issues your
	firm had in providing the data in this section.

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: MAMMO Phase: FINAL

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

If your firm 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.

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