CONTENTS

General Instructions

Section A	Organization, Accounting Practices, Markets and Merchandise
Section B	Not Applicable
Section C	Sales to the United States
Section D	Factors of Production
Section E	Cost of Further Manufacturing Performed in the United States
Appendix I	Glossary of Terms
Appendix II	Instructions for Submitting Computer Data
Appendix III	Description of Products Under Investigation
Appendix IV	Forms for Company Official Certification and Certificate of Service
Appendix V	Reconciliations
Appendix VI	Factors of Production, Market-Economy Purchases, By-Product or Co-Product Offsets, and Surrogate Values Spreadsheets
Appendix VII	Sample Chart of Affiliation Structure
Appendix VIII	Certification regarding Photocopies
Appendix IX	Sigma Freight
Appendix X	Letter Regarding the Withdrawal of Information

GENERAL INSTRUCTIONS

This nonmarket economy questionnaire requests information for the United States Department of Commerce (the "Department") to determine whether your company dumped the **subject merchandise** in the United States.[1] Dumping is the sale of merchandise to the United States at prices below the **normal value** of the merchandise. If you have questions, we urge you to consult with the official in charge named on the cover page. If for any reason you do not believe that you can complete the response to the questionnaire by the date specified on the cover page of this questionnaire, or in the form requested, you should contact the official in charge immediately.

Your response to the questionnaire should include all of the information requested. It is essential and in your interest that the Department receive complete information early in the proceeding to ensure a thorough and accurate analysis and to provide all parties the fullest opportunity to review and comment on your submission and the Department's analysis. Moreover, as a respondent, your company must wholly and fully participate in this investigation. In other words, a respondent must respond to all information that has been requested by the Department and not selectively choose which requests to respond to or which information to submit. It cannot fully participate in one aspect of the review, while simultaneously failing to provide complete, accurate and verifiable data with respect to other required elements of that review. We appreciate your cooperation in this investigation.

This investigation will be conducted on a schedule dictated by law. If you fail to provide accurately the information requested within the time provided, the Department may be required to base its findings on the **facts available.** If you fail to cooperate with the Department by not acting to the best of your ability to comply with a request for information, the Department may use information that is adverse to your interest in conducting its analysis.

This questionnaire consists of the following sections:

Section A requests information about your organization and accounting practices, and general information regarding sales of the merchandise under investigation.

Section B Not Applicable

Section C requests information about the United States market, including a sales list and

[1] In each section of the questionnaire, the first use of each term included in the Glossary of Terms at Appendix I is shown in bold type face.

other data necessary to calculate the price in or to the United States market.

Section D requests information about the **factors of production** of the merchandise sold in or to the United States.

Section E requests information about further processing in the United States prior to delivery to un**affiliated** United States customers.

I. Instructions for Filing the Response

The following instructions apply not only to your questionnaire response but to all documents you submit to the Department during the course of this proceeding.

1. File your response in Washington, D.C., at the address listed on the cover of the questionnaire.

2. **Proprietary versions** of the response should be submitted on the day specified on the cover of the questionnaire. The **public version** of the response may be filed one business day after the proprietary version.

3. File the original and six copies of the proprietary version. However, if you file an electronic copy of the proprietary version in Microsoft Office Word format, you need file only the original version and four copies. For either alternative, only one copy of sample printouts and electronic media containing sales files and cost files need be submitted. (Appendix II contains instructions for filing electronic media.)

   In Appendix VI, we are requesting that you submit spreadsheets summarizing your factors of production, by-product or co-product offsets, and market-economy purchases. You are responsible for ensuring that these spreadsheets are consistent with the accompanying narrative response and the accompanying databases submitted on electronic media. In the event of unexplained discrepancies among these items, the Department retains the authority to determine, under its discretion, the most appropriate information given the facts of the case.

   File the original and three copies of the public version of your narrative response and attachments, including sample printouts.

4. Submit the required **certification of accuracy.** Providers of information and the person(s) submitting it, if different (*e.g.*, a legal representative), must certify that they have read the submission and that the information submitted is accurate and complete. The Department cannot accept questionnaire responses that do not contain the certification statements. A form for such certification is included at Appendix IV of this questionnaire. You may photocopy this form and submit a completed copy with each of

your submissions.

5. Provide the required **certificate of service** with each proprietary version and public version submitted to the Department.

6. Request **proprietary treatment** for information submitted that you do not wish to be made publicly available. As a general rule, the Department places all correspondence and submissions received in the course of an antidumping proceeding in a public reading file. However, information deemed to be **proprietary information** will not be made available to the public. If you wish to make a request for proprietary treatment for particular information, refer to section 351.105, 351.304, 351.305 and 351.306 of the Department's **regulations**.[2] Submit the request for proprietary treatment no later than one business day following the submission of the proprietary version of the questionnaire response accompanied by:

   (1) a non-proprietary (public) version of your response that is in sufficient detail to permit a reasonable understanding of the information submitted in confidence,[3] and/or

   (2) an itemization of particular information that you believe you are unable to summarize. State the reasons why you cannot summarize each piece of information.

   Responses, or portions thereof, that are not adequately summarized may be returned to you and not used.

7. Submit the statements required regarding limited release of proprietary information under the provisions of an **administrative protective order** ("APO"). U.S. law permits limited disclosure to representatives of parties (*e.g.*, legal counsel) of certain business proprietary information, including electronic business proprietary information, under an APO. (Note that data received under an APO cannot be shared with others who are not covered by the APO.) Under the provisions governing APO disclosure, you must submit either:

   (1) a statement agreeing to permit the release under APO of information submitted by you in confidence during the course of the proceeding, or

---

[2] Instructions concerning the treatment of proprietary information is contained in sections 351.304, 351.305, and 351.306 of the Department's regulations.

[3] Generally, numerical data are adequately summarized if grouped or presented in terms of indices or figures ranged within ten percent of the actual figure. If a particular portion of the data is voluminous, use ranged figures for at least one percent of the voluminous portion.

(2) a statement itemizing those portions of the information which you believe should not be released under APO, together with arguments supporting your objections to that release.

We are required by our regulations to reject, at the time of filing, submissions of business proprietary information that do not contain one of these statements. You must state in the upper right-hand corner of the cover letter accompanying your questionnaire response whether you agree or object to release of the submitted information under APO. (*See* section 351.303 of our regulations for specific instructions.)[4]

8. Place brackets ("[ ]") around information for which you request business proprietary treatment. Place double brackets ("[[ ]]") around information for which you request proprietary treatment and which you do not agree to release under APO.

9. Provide to all parties whose representatives have been granted an APO (as listed in the cover letter to the questionnaire or as listed in a subsequent letter from the Department) a complete copy of the submission, proprietary and public versions, except for that information which you do not agree to release under APO. If you exclude information because you do not agree to release it under APO, submit with your response to the Department a certificate of service and a copy of the APO version of the document containing the information that you agree may be released under APO. For parties that do not have access to information under APO, please provide a public version only.

II. <u>Instructions for Preparing the Response</u>

1. Prepare your response in typed form and in English. Include an original and translated version of all pertinent portions of non-English language documents that accompany your response, including the financial statements. If this is impractical for certain of the documents, please contact the official in charge.

2. Repeat the question to which you are responding in your narrative submission and place your answer directly below it. To assist you, we have provided a copy of the questionnaire in electronic form in Microsoft Office Word format.

3. Refer to the instructions at Appendix II for information requested in electronic form (*i.e.*, sales lists and factors of production data).

---

[4] If you do not agree to release under APO all or part of the proprietary information, but we determine that the information should be released, you will have the opportunity to withdraw the information (*see* section 351.304(d) of our regulations). However, any information which you withdraw will be taken out of the official record and will not be used in our determination.

4. Include all worksheets, financial reports and other requested documents as appendices to your response.

5. Identify any source documents maintained in the normal course of business you have relied on in preparing your response, and specify the cities where these documents are maintained. Please include this information in an Appendix to your response. This information is used by the Department to prepare for **verification**.

6. Prepare sample printouts of information from each computer file submitted. The sample should contain the first and every fiftieth record (*i.e.*, observations 1, 50, 100, . . ., n) in each file submitted. However, if the total records in a file number less than 500, prepare a printout of the entire file.[5] Submit the printouts with the electronic files (see Appendix II part D).

7. Provide a table of contents and a table of attachments. Assign a number to each attachment and include a descriptive name for each attachment and its number in the table.

[5] While the Department requires only sample printouts, if requested you are obligated to provide a full printout of all submitted data files to any party granted an APO.

SECTION A

Organization, Accounting Practices, Markets and Merchandise

1. Quantity and Value of Sales

   a. State the total quantity and value of the merchandise under consideration[6] that you sold during the period of investigation ("POI") in the United States. A chart for reporting the sales quantity and value can be found at the end of this section. Complete a chart for all merchandise under consideration produced and sold by your company.

   b. Exclude your U.S. sales to **affiliated resellers**. Report instead the resales to the first unaffiliated customer.

   c. If you export merchandise for entry into a foreign trade zone ("FTZ") or into a bonded warehouse in the United States, this may affect the way we treat these sales. Please contact the official in charge to discuss the reporting requirements.

The Department presumes that a single weighted-average dumping margin is appropriate for all exporters in a nonmarket economy country. The Department may, however, consider requests for separate rates from individual exporters. Individual exporters requesting a separate rate must respond to the following questions in order for the Department to consider fully the issue of separate rates.

[6] By "merchandise under consideration" we mean merchandise described in Appendix III of the questionnaire, regardless of market destination.

2. Separate Rates

This section requests economic, industry, and company-specific information. All companies requesting a separate rate must respond to the following questions. The questions presented in this section are identical to the questions contained in the Separate-Rate Application, which was posted on the Department's web-site on October 7, 2005 (with Appendix VIII, labeled Appendix A on the website, posted on October 12, 2005). Because your company was selected as a mandatory respondent in this investigation, you have several options with regard to the manner in which to support your request for a separate rate:

1)If you have already submitted a Separate Rate Application you may rely on that as the basis to support your request for a separate rate by stating this intention in your Section A questionnaire;

2)You may respond to the Separate Rate Section of this questionnaire and agree to withdraw your earlier Separate Rate Section from the record of this proceeding (if you select this option, please include the letter attached in **Appendix X** of this questionnaire, regarding the withdrawal of information, to your questionnaire response); or

3)If you have not already submitted a Separate Rate Application, you must respond to the Separate Rate Section in the Section A questionnaire.

The Department assigns separate rates in non-market economy ("NME") cases only if the applicant can demonstrate an absence of both *de jure* and *de facto* governmental control over its export activities in accordance with the separate-rates test criteria. In determining whether companies should receive separate rates, we focus our attention on the exporter rather than the manufacturer. See Notice of Final Determination of Sales at Less Than Fair Value: Manganese Metal from the People's Republic of China, 60 FR 56045 (November 6, 1995).

To establish whether a company's export activities are sufficiently independent of the government to be eligible for separate rate status, the Department analyzes each exporting entity under the test established in the Final Determination of Sales at Less Than Fair Value: Sparklers from the People's Republic of China, 56 FR 20588 (May 6, 1991) ("Sparklers"), and later expanded upon in Final Determination of Sales at Less Than Fair Value: Silicon Carbide from the People's Republic of China, 59 FR 22585 (May 2, 1994) ("Silicon Carbide"). Under this analysis, exporters in non-market economies are accorded separate, company-specific margins if they can provide sufficient proof of an absence of government control, both in law and in fact, with respect to export activities. Evidence supporting, though not requiring, a finding of *de jure* absence of government control over export activities includes: 1) an absence of restrictive stipulations associated with an individual exporter's business and export licenses; 2) any legislative enactments decentralizing control of companies; and 3) any other formal measures by the central and/or local government decentralizing control of companies. See Sparklers, 56 FR at 20588.

Our analysis of absence of *de facto* government control over exports is typically based on the following four factors: 1) whether each exporter sets its own export prices independent of the government and without the approval of a government authority; 2) whether each exporter retains the proceeds from its sales and makes independent decisions regarding disposition of profits or financing of losses; 3) whether each exporter has the authority to negotiate and sign contracts and other agreements; and 4) whether each exporter has autonomy from the government regarding the selection of management. See Silicon Carbide, 59 FR at 22586-87.

- NME firms owned wholly by entities located in market-economy countries, provided that the ultimate owners are also located in market-economy countries ("wholly market-economy owned firms"), need only fill out the certifications and provide supporting documentation for the fields in the application that are marked with an asterisk, "*". These marked fields pertain to the firm's eligibility for separate rates consideration based on having sold subject merchandise to the United States during the POI and support the firm's claim that it is in fact wholly owned by a market-economy entity. This information is also necessary for administration once a separate rate has been issued.
- There are two sets of requirements for reporting any affiliations with other firms involved in the production or sale of the subject merchandise, one for wholly market-economy owned firms and another for NME-owned firms.
- Wholly market-economy owned firms are required to report *all* of their affiliations with other firms involved in the production or sale of the subject merchandise.
- Firms that are not owned wholly by market-economy entities, however, must only identify any affiliates that exported subject merchandise to the United States during the period of investigation and any U.S. affiliates involved in the sale of the subject merchandise.
- The name that is provided to the Department in the questionnaire response must be the name that appears on the exporter's business license/registration documents. All shipments to the United States declared to U.S. Customs and Border Protection must identify the exporter by its legal business name, and this name must match the name that appears on the exporter's business/registration documents. If your firm is assigned separate rate status, your firm will only be able to ship under your separate rate under names that are included on your business license/registration documents.
- All documents submitted in response to a specific question must pertain to the same sale. If volumes or values do not exactly match from one document to the next, the applicant must provide a clear narrative explanation as to why they do not and what the appropriate links are among the documents. The applicant must also provide and explain additional documentation necessary to corroborate its explanation in this regard. For example, if an invoice shows a sales value of $10,000, but the payment amount is $15,000, the applicant must explain the difference and provide documentary support for the explanation.
- **All** documents submitted with the application must be, to the extent possible, direct unaltered photocopies of the original documents (*i.e.*, no copies of copies, and the documents must not be altered in any way, including tracing). All documents submitted with the application must be legible to the maximum extent possible. In case the direct

photocopy is not legible, or if submitting a direct photocopy is not possible, you must supply the most legible unaltered photocopy available. Firms that are not able to submit completely legible copies of all the documents required in the application, or are unable to submit a required document, must complete the additional certification in Appendix IX and include an explanation of why the submission of completely legible documents is not possible. In addition, you must provide supplemental information explaining the contents of any documents that are not fully legible. Illegible or altered documents cannot be considered evidence of the points for which they are required if not accompanied by the requisite certifications and explanations in Appendix VIII.

All supporting documentation pertaining to a U.S. sale must pertain to the same sale and be legible to the maximum extent possible. Moreover, the information contained in these documents must be consistent. If there are any discrepancies between information contained in a series of documents pertaining to the same sale, all such discrepancies must be clearly identified and explained. This is necessary to substantiate the claim for separate rates eligibility. Submission of alternate documents in lieu of documents that are not available and/or clarification of documents that are not completely legible may be acceptable, depending on the facts of each individual case. All firms that do not provide completely legible photocopies of all of the documents that are required in the application must make the additional certification in Appendix VIII and include an explanation of why the submission of completely legible photocopies of all the documents required in the application is not possible.

SECTION I

Administration

*1. Is the applicant identified by any other names, as a legal matter in the home market, in third countries, or in the United States (*i.e.*, does the company use trade names)?[7]

___ Yes
___ No

(If yes, then list any and all other names here, when and under what circumstances they are used, and confirm whether the business license/registration documents submitted with this application and covering the POR include alternative names)

_____

[7] Trade names are other names under which the company does business. It does not include product brand names or the names of any other entities in the applicant's "group," affiliated or otherwise. If your firm is assigned separate rate status, your firm will only be able to ship under your separate rate under names that are included on your business license/registration documents.

*2. Firms must, to the maximum extent possible, provide a direct legible photocopy (not a copy of a copy) of all of the following original documents for the first sale by invoice date of subject merchandise to an unaffiliated customer in the United States during the POI for a commercial transaction.[8] These documents must not be altered in any way. If your firm's first sale by invoice date during the period of investigation was a sample sale, a sale of non-commercial quantities, or a sale to an affiliated party, identify this sale and provide documentation on another sale.[9] If providing documentation on another sale during the period of investigation, attach an explanation of why providing documentation for the first sale during the period of investigation was not possible. If you are not able to supply completely legible photocopies of any documents required below, you must supply the most legible photocopies available, complete the additional certification in Appendix VIII, and include an explanation in it of why submission of all the photocopies in completely legible form is not possible.

1. The U.S. Customs 7501 Entry Summary or the U.S. FDA Release Form.[10]

   For the U.S. Customs 7501 Entry Summary and the U.S. FDA Release Form only, if the exporter is unable to obtain the relevant U.S. Customs 7501 Entry Summary or U.S. FDA Release Form, the exporter must explain why it is unable to submit these documents and provide documentation that it has attempted to obtain these documents from its customers.

2. The bill of lading.
3. The commercial invoice.
4. The packing list.
5. Documentation demonstrating receipt of payment.

All the documents above must pertain to the same sale (normally, the first sale by invoice date during the POI, unless one of the conditions discussed above applies). In addition to providing these documents, you must provide a narrative explanation of how the documents relate to one another and what the specific links are among the documents. If volumes or values do not exactly match from one document to the next, the applicant must provide in this narrative a clear explanation of any apparent discrepancies among the documents. The applicant must also provide and explain additional documentation necessary to corroborate its explanation in this regard. For example, if the invoice and payment amount do not match, the applicant must explain the difference and provide documentary support for this explanation.

---

[8] If you are not able to supply completely legible photocopies of any documents requested in the application, you must attach an explanation of why submission of completely legible photocopies is not possible.

[9] If your firm has *only* made sample shipments or sales or sales of non-commercial quantities during the period of investigation, your firm is ineligible to apply for a separate rate at this time. If your firm has *only* made sales to affiliated parties during the period of investigation, you must provide evidence of the first sale to an *unaffiliated* U.S. customer to qualify for a separate rate.

[10] If the merchandise was entered into the United States informally using Customs Form 368 or 368A because the value of the entry was USD $2000 or less, provide a copy of Customs Form 368 or 368A.

*3. Does the applicant have any knowledge that merchandise it sold was resold to the United States through market-economy third-country exporters in U.S. dollars?[11]

___ Yes
___ No

*4. Provide the full name and contact information (including address, telephone, fax, and e-mail address) of each of the applicant's producers and/or suppliers of subject merchandise whose merchandise the applicant sold or exported to the United States during the POI.[12] The Department notes that, as discussed in Policy Bulletin 05.1: Separate-Rates Practice and Application of Combination Rates in Antidumping Investigations involving Non-Market Economy Countries, the Department is issuing exporter-producer combination rates in investigations. Therefore, the names and antidumping duty rates with respect to these exporter and producer combinations will be listed in the Federal Register at the preliminary determination of this investigation, and as such these combinations must be public information.

_____

*5. Are the producers and/or suppliers, listed under question 6 above, identified by any other names as a legal matter in the home market, in third countries, or in the United States (*i.e.*, do the companies use trade names)?[13]

___ Yes
___ No

(If yes, then list any and all other names here, and provide a copy of the business licenses/registration documents showing that the suppliers use these alternative names and the dates in which these names were in effect)

_____

*6. Indicate whether, to the best of your knowledge, the producers and/or suppliers identified under question 6 above directly exported subject merchandise to the United States during the period of investigation.

SECTION II

***De Jure* Control**

Please check the boxes below if you can certify that the statements below are accurate

[11] The Department considers China, Vietnam, Ukraine, Belarus, Moldova, Azerbaijan, Georgia, Armenia, Kyrgyzstan, Tajikistan, Turkmenistan, and Uzbekistan to be non-market economies.

[12] If your firm is assigned separate rate status, the rate will *only* apply to merchandise exported by your firm and supplied by the producers identified here.

[13] Trade names are other names under which the company does business. It does not include product brand names or the names of any other entities in the applicant's "group," affiliated or otherwise.

1. ☐ The applicant certifies that there are no government laws or regulations, at either national and sub-national (*e.g.*, provincial, local) levels of government, that control the applicant's export activities.

2a. ☐ The applicant possesses an official government business license/registration documents valid during the period of investigation and is submitting with the application original-language and translated copies of any business licenses in effect during the POI, the most current business license, and original-language and translated unaltered photocopies of any and all additional business licenses/registration documents or amendments thereto issued to the applicant and in effect during the POI. If you are not able to supply completely legible photocopies of any documents required below, you must supply the most legible photocopies available, complete the additional certification in Appendix VIII, and include an explanation in it of why submission of all the photocopies in completely legible form is not possible.[14]

2b. Indicate the full name and contact information (address, telephone, fax, and e-mail address) of the business license/registration documents authority which issued your business license/registration documents and the expiration date of your business license/registration documents.

_____

2c. Provide the month, day, and year on which the business license authority last renewed your business license/registration documents.

_____

*2d. Indicate from the following choices the ownership structure under which your company has registered itself with the official government business license issuing authority.

☐ owned by all of the people
☐ collective
☐ limited liability
☐ proprietorship
☐ partnership
☐ joint-stock limited company
☐ other

If "other", please describe:_____

[14] Note that if the Department determines that your firm is eligible for separate rate status, the separate rate will only apply to the firm as named in your business license/registration documents and not to any alternative or trade names that are not included in your business license/registration documents. It is the Department's understanding that a valid business license/registration documents with a clearly defined period of validity issued by the appropriate licensing authority is required for all business activity. An applicant submitting a business license without an expiration date must provide an explanation in order for the Department to consider its application.

Select from the following choices any applicable secondary forms of registration related to foreign-invested enterprises that apply to your firm:

☐ domestic-foreign equity joint venture
☐ domestic-foreign contractual joint venture
☐ wholly foreign-owned enterprise
☐ other

If "other", please describe:_____

3a. Indicate the full name and contact information (address, telephone, fax, e-mail address) of the business license authority which issued your export certificate of approval and the dates in which it was in effect.

_____

3b. Provide the month, day, and year on which the business license authority issued your export certificate of approval.

_____

3c. ☐ By checking the box, the applicant certifies that it is submitting with the application an original-language and translated copy of its export certificate of approval which was valid during the period of investigation.[15]

4. In order to conduct export activities, is the applicant required by any national, provincial, or local government law or regulation to possess additional certificates or other documents related to the legal status and/or operation of its business beyond those discussed above?[16]

___ Yes
___ No

If yes, identify the certificates below, and submit original-language and translated copies thereof with the application.

_____

5. Check the box next to the following PRC government laws and legislative enactments that apply to the applicant firm:

[15] It is the Department's understanding that an export certificate of approval issued by the appropriate licensing authorities is required for all export activity. Therefore, the Department will not consider a separate rate for any applicant not providing such a certificate.

[16] The Department is interested only in government laws or regulations which restrict or limit exports rather than regulations which regulate purely domestic operations (*i.e.*, environmental or labor regulations). If you are unsure of the possible relevance of a given law, please contact the Department immediately.

- ☐ Company Law of the PRC, effective as of January 1, 1996
- ☐ Foreign Trade Law of the PRC, effective as of July 1, 1994
- ☐ Administrative Regulations of the PRC Governing the Registration of Legal Corporations
- ☐ PRC's Enterprise Legal Person Registration Administrative Regulations of June 13, 1988
- ☐ Law of the PRC on Chinese-Foreign Cooperative Joint Ventures
- ☐ Regulation Governing Rural Collectively-Owned Enterprises of the PRC of 1990
- ☐ Law of the PRC on Industrial Enterprises Owned by the Whole People, adopted on April 13, 1988 ("The Industrial Enterprises Law")
- ☐ Regulations for Transformation of Operational Mechanisms of State-Owned Industrial Enterprises of 1992 ("Business Operation Provisions")
- ☐ The Organic Law on Village Communities in the PRC ("Village Committee Law")
- ☐ Other

If "other", identify below any additional specific national PRC laws and/or legislative enactments which relate to the export functions of the applying company:

_____

6. Are there any sub-national (provincial, local) government laws affecting the applicant's export operations?

___ Yes
___ No

If yes, identify the laws and submit original and translated copies of each provincial or local government law with the application:

_____

SECTION III

***De Facto* Control**

A. Ownership

*1. Indicate the names and contact information (full business address, telephone, fax, e-mail address) of the legal entities which are the intermediate and ultimate owners of your company (also indicate the percent ownership of your company by each entity).[17] In addition, identify any individuals who own more than 10% of your company.

_____

[17] Note to firms applying as wholly market-economy owned entities: document whether the ultimate owners of your company are located in market-economy countries and, if so, indicate which market-economy countries.

*2. Applicants must provide the following documentation to support your response to question 1 above.

1. capital verification report
2. consolidated financial statements
3. share transfer agreement
4. articles of incorporation/articles of association
5. export certificate of approval

If you are not able to submit legible, unaltered photocopies of each of these documents, you must provide the most legible unaltered copies of the documents available, complete the additional certification in Appendix VIII, and provide a narrative description of why you are not able to provide legible photocopies all of the above documents.

B. Price Negotiation

Please check the boxes below to make the following certifications.

3. ☐ The applicant certifies that its export prices are not set by, subject to the approval of, or in any way controlled by a government entity at any level (national, provincial, local).[18]

4. ☐ The applicant certifies that it has independent authority to negotiate and sign export contracts and other agreements (conducts independent price negotiation).[19]

5. The Applicant must provide documentation supporting its certification that the applicant conducts independent price negotiation (in question 4 above) and which it is submitting with the application.[20] Examples include the following types of documentation:

1. faxes/e-mail correspondence between applicant and unaffiliated U.S. customer
2. purchase order from unaffiliated U.S. customer
3. order confirmation
4. logs of negotiations conducted over the telephone with an unaffiliated U.S. customer.

---

[18] This includes, but is not limited to, the presence of government officials at any meeting where export and pricing decisions are discussed.

[19] The authority to conduct independent price negotiation refers to the ability of an NME exporter to set its own export prices independently of the government at any level (national, provincial, local) and without the approval of any government entity.

[20] Applicants must provide documents showing price negotiation, not documents merely confirming that a sale will take place at a given price. If your firm conducts its price negotiation by phone, does not keep phone logs of meetings conducted over the phone, and therefore has no records of price negotiation, you are required to attach 1) a certification that there are no records of price negotiation, and 2) an affidavit signed and dated by the unaffiliated U.S. customer attesting that it conducts independent price negotiation with the applying firm. Affidavits must provide adequate information to link the applicant to the party signing the affidavit.

If you do not have any documentation to support your certification that your firm conducts independent price negotiation, you may submit an affidavit as an alternative. This affidavit testifying to independent price negotiation must be signed and dated by an *unaffiliated* U.S. customer, including the unaffiliated U.S. customer's contact information.

C. Selection of Management

6. ☐ By checking the box, the applicant certifies that it has autonomy from all levels of the government (national, provincial, local) and from any government entities in making decisions regarding the selection of management.

7. The applicant must provide specific documentation that evidence independence in the selection of management which support its certification in question 6 above. Examples might include the following:

∃ appointment letters
∃ director meeting minutes
∃ company-issued resolutions/notifications (besides appointment letters)

8. Provide the name of each manager and board member in the applicant's company who held a management position during the period of investigation and the date (month, day, year) that each of the managers obtained his or her position at your company. Also provide the names of each manager and his or her employment (i.e., position, name of company) for the three years prior to working at your company if they have been working at your company for less than three years.

9. Have any of the applying firm's managers or board members worked for the government, at any level (national, provincial, local), or any government entities, in the past three years?

___ Yes
___ No
(If yes, briefly describe the government involvement of the manager in question in supporting documentation.)

10. Does the applying firm have to submit any of its candidates for managerial positions within the firm for approval to any government entity at any level (national, provincial, local)?
___ Yes
___ No
(If yes, you certify that you are filing a document with the application containing an explanation.)

D. Disposition of Profits

11. ☐ By checking the box, the applicant certifies that it retains the proceeds of its export sales

and makes independent decisions regarding the disposition of profits or financing of losses.

12. If the applicant realized a profit during the period of investigation, then describe the process by which the applicant's profits were distributed. Specifically, indicate the sections in the company's books and records where such profits were accounted.

---

13. Did the applicant make any disbursements to government accounts during the period of investigation other than for tax or government-provided goods or services?

___ Yes
___ No

(If yes, describe these disbursements, the specific government accounts, and file a document or documents with the Department illustrating these disbursements.)

14. ☐ For each bank account held by the applicant during the period of investigation, the applicant certifies it will provide the following information:

- Name and address of the bank
- Bank account number
- Month/Year in which the account was opened

---

15. ☐ The applicant certifies that it is submitting with the application year-end financial statements covering all months of the POI as well as any other information which support the applicant's response to question 13 above.

E. Affiliation

All firms must respond to question 16. In addition, firms applying under NME ownership must respond to question 17, and firms that are applying for separate rate status under the status of 100% foreign ownership must respond to question 18.

Section 771(33) of the Tariff Act of 1930, as amended, defines affiliates as:

A. Members of a family, including brothers and sisters (whether by the whole or half blood), spouse, ancestors, and linked descendants
B. Any officer and director of an organization and such organization
C, Partners
D. Employer and Employee
E. Any person directly or indirectly owning, controlling, or holding with power to vote, five

percent or more of the outstanding voting stock or shares or any organization and such organization

F. Two or more persons directly or indirectly controlling, controlled by, or under common control with, any person

G. Any person who controls any other person

For the purposes of affiliation, the Department will consider a person to control another person if the person is legally or operationally in a position to exercise restraint or direction over the other person.

*16. Explain whether your firm made shipments or sales to unaffiliated parties, affiliated parties or both, during the period of investigation, as defined by Section 771(33) of the Tariff Act of 1930. If your firm *only* made sales to affiliated parties during the period of investigation, you must provide evidence of the first sale to the first unaffiliated party to qualify for a separate rate.

☐ shipments or sales to affiliated parties only
☐ shipments or sales to unaffiliated parties only
☐ shipments or sales to both affiliated and unaffiliated parties

17. As defined by Section 771(33) of the Tariff Act of 1930, as amended, does the applicant have *any affiliates that are located in the United States, or that exported merchandise to the United States* which would fall under the description of merchandise covered by the scope of the proceeding?

☐ Yes
☐ No

If the applying firm is affiliated with any other exporters of merchandise described in the petition of the investigation pursuant to this definition of affiliation, then the firm must list the full names and contact information (business address, telephone, fax, e-mail address) of the affiliates below. In addition, it would be useful if you would provide a chart demonstrating the ownership and affiliation structure of all of your affiliates that are involved in the production or sale of subject merchandise. For an example of how you might design this chart, see Appendix VIII.

---

*18. As defined by Section 771(33) of the Tariff Act of 1930, as amended, does the applicant have any *affiliates involved in the production or sale of merchandise in the home market, third-country markets, or the United States* which would fall under the description of merchandise covered by the scope of the proceeding?

☐ Yes
☐ No

If the applying firm is affiliated with any other producers or exporters of merchandise described in the petition of the investigation pursuant to this definition of affiliation, then list the full names and contact information (business address, telephone, fax, e-mail address) of the affiliates below. In addition, it would be useful if you would provide a chart demonstrating the ownership and affiliation structure of all of your affiliates that are involved in the production or sale of subject merchandise. For an example of how you might design this chart, see Appendix VII.

The remaining questions must be answered by all companies (exporters and manufacturers), whether or not the company is requesting a separate rate.

3. Corporate Structure and Affiliations

The purpose of the questions concerning operational and legal structures and affiliations is to provide the Department with an understanding of your company and its role in the manufacture and/or sale of the merchandise under consideration.

a. Provide an organization chart and description of your company's operating structure. Describe the general organization of the company and each of its operating units. For example, if your operations are structured by product or families of products, provide a description of each product group; if your operations are structured by function, provide a list of functional groups and the activities performed by each.

   Although you may provide a general description of the structure of the company as a whole, it is particularly important that the description of those units involved in the development, manufacture, sale and distribution of the merchandise under consideration be sufficiently detailed to provide the Department with a good working understanding of how these units function within the company.

   In addition, for all affiliated producers of the merchandise under consideration, please provide information for the following table.

Producers of Merchandise Under Consideration[21]	**Producers of Merchandise Under Consideration that match CONNUMS sold in, or to, the United States**[22]	**Description of the Affiliated Producer's Relationship to the Respondent**
Company A		
Company B		
Company C		

b. Provide a list of all the manufacturing facilities, sales office locations, research and development facilities and administrative offices involved in the manufacture and sale of the merchandise under consideration operated by your company. Please give a full address for each facility, and briefly describe the purpose of each.

c. Provide an organization chart and description of your company's legal structure. For an example of how you might design this chart, see Appendix VII. In addition to the chart, provide a list of names and addresses of all companies affiliated with your company through stock ownership or otherwise. In responding to this question, refer to the definition of affiliated person provided in the Glossary of Terms at Appendix I. Describe also the activities of each affiliated company, with particular attention to those involved with the merchandise under consideration. Specify the percentage of ownership and cross ownership among the companies listed.

d. Provide a list of all third parties in which your company or its owners, either collectively or individually, own 5 percent or more in stock. Include each third party's full name and address and describe its activities. Also provide a complete list of companies or individuals that own 5 percent or more in stock in the third party which includes each owner's full name and address and specifies its percentage of ownership.

e. Provide a full narrative history of your company.

f. Provide a copy of any capital verification reports you filed during the POI or in the three years prior to the POI.

4. Sales Process

[21] See Appendix I for a definition of "Merchandise Under Consideration."

[22] Indicate whether the company produced merchandise under consideration that was identical to the CONNUMS sold in, or to, the U.S. market

The **date of sale** for your sales to the United States is important to the Department's analysis. It will determine which sales and production factors are reported in response to sections C and D of this questionnaire. Note, however, that the Department's criteria for determining date of sale may differ from those that you apply in the normal course of business. A description of the Department's criteria is included in the Glossary of Terms at Appendix I; please use these criteria in preparing your response to this questionnaire. If you have difficulty deciding which date to use as the date of sale, please contact the official in charge immediately.

a. Describe the date (e.g., invoice date) you have selected as the date of sale for sales to the United States during the period of investigation, and explain why the date(s) selected best satisfies the Department's date of sale criteria. If you use different methods to identify the date of sale for different transactions, explain why you have done so.

b. Explain how you determined the ultimate customer or market for the products sold through resellers. For these sales, explain whether you restrict the reseller's volume or geographic area for distribution. In addition, explain whether you provide customer lists to or make joint sales calls with the reseller, or provide post-sales support or purchase incentives to the reseller's customers. Provide written sales contracts or sales terms with these resellers.

c. Describe your agreement(s) for sales in the United States (e.g., long-term purchase contract, short-term purchase contract, purchase order, order confirmation). Provide a copy of each type of agreement and all sales-related documentation generated in the sales process (including the purchase order, internal and external order confirmation, invoice, shipping and export documentation, and Customs entry documentation) for a sample sale in the U.S. market during the POI.

d. Describe the types of changes that occur after the initial agreement that affect the terms of the sale other than delivery dates. Explain how these types of changes affected your determination of date of sale.

e. Provide the approximate percentage of sales of the subject merchandise in the United States market made pursuant to each type of agreement listed in response to question 4. c. above.

f. Provide copies of all price lists used in sales of the subject merchandise to the United States and identify the types of sales to which these price lists pertain. Include any discount or rebate schedules used with each price list.

g. Describe the process by which your company finds its U.S. customers. Describe the roles played by all individuals or entities (within and outside your company) involved in finding U.S. customers.

h. Describe the process by which your company sets prices with its U.S. customers.

i. Provide a copy of your business plans covering the POI and the previous year.

5. Accounting/Financial Practices

A detailed understanding of your accounting and financial practices will help to ensure an accurate verification, and is necessary for the Department to analyze your reporting and allocation of expenses.

a. Describe your company's accounting and financial reporting practices, including your normal corporate accounting period.

b. Please provide the following financial documents for the two most recently completed fiscal years plus all subsequent monthly or quarterly statements: (1) chart of accounts; (2) audited, consolidated and unconsolidated financial statements (including any footnotes and auditor's opinion); (3) internal financial statements or profit and loss reports of any kind that are prepared and maintained in the normal course of business for the merchandise under investigation; or, in the absence of such reports, for the product line that corresponds most closely to the definition of the merchandise under investigation, including those for the next largest and smallest categories of merchandise and for the next largest and smallest internal business unit producing or selling the merchandise under investigation; (4) financial statements or other relevant documents (i.e., profit and loss reports) of all affiliates involved in the production or sale of the merchandise under consideration in the U.S. market, of all affiliated suppliers to these affiliates, and of the parent(s) of these affiliates; (5) any financial statement or other financial report filed with the local or national government of the country in which your company is located.

6. Merchandise

The questions which follow relate to the merchandise under consideration sold in the United States.

a. Provide a description of the types of merchandise under consideration produced and/or sold by your company. Include in the description a list (and brief description) of any products with a similar production process to the merchandise under consideration.

b. Provide a key to your product codes assigned to the merchandise in the normal course of business, including an explanation of the full range of prefixes, suffixes, or other notations that identify special features. Explain whether identical products are listed under different codes depending on whether the product is destined for the U.S. market or another market. If so, provide a list showing how identical products are identified by product codes.

c. Provide all catalogs and brochures issued by your company and affiliates that include the merchandise under consideration sold by your company in the United States. Also provide copies of internet-based advertising by your company and its affiliates that include the merchandise under consideration sold by your company to the United States. Indicate the relevant sites.

d. Provide a listing of every intermediate party involved in the production of the merchandise (including suppliers and parties who provided tolling service). For each party listed, also provide the merchandise produced or provided, the stage at which the merchandise was produced or provided, and the percentage of each output produced or provided. Please be prepared to provide factor of production information for each party listed, if requested by the Department.

	MERCHANDISE	STAGE OF PRODUCTION	PERCENTAGE OF OUTPUT
SUPPLIER 1			
SUPPLIER 2			
TOLLER 1			
TOLLER 2			

7. Further Manufacturing in the United States

This section of the questionnaire concerns merchandise under consideration exported to the United States and changed in value or physical condition ("**further manufactured**") prior to delivery to the first unaffiliated customer in the United States.

Provide the following information with respect to merchandise that is further manufactured in the United States.

a. Provide a list and description of the products sold to unaffiliated customers during the POI that were produced from or contain merchandise under consideration. For each such product sold, identify the particular merchandise under consideration used to produce that final product.

b. Provide the weighted-average net price for the period of investigation charged to the affiliated importer for each product included in the investigation that has been further manufactured and the weighted-average net price for the period of investigation charged the unaffiliated U.S. customers for each further manufactured final product. Report this data in a format which will permit the Department to compare the transfer prices of the imported merchandise to the price of the final product sold in the U.S. market. We suggest that for each further manufactured product sold during the POI, you list the product code and name of the merchandise under consideration included in that product, the net unit transfer price charged the affiliated importer, the amount of the merchandise

under consideration consumed in the production of the further manufactured product, and the total value of the consumed merchandise under consideration (unit transfer price multiplied by the number of units consumed in production).

8. Exports Through Intermediate Countries

If you are aware that any of the merchandise you sold to third countries was ultimately shipped to the United States, please contact the official in charge within two weeks of the receipt of this questionnaire.

9. Sales of Merchandise under Consideration Supplied by an Unaffiliated Producer.

Please respond to this section of the questionnaire if neither your company nor an affiliate produced the merchandise under consideration which you sold to the United States.

a. Provide the names, addresses and facsimile numbers of those companies that supplied you with the merchandise under consideration that your company or an affiliate sold to the United States.

b. State whether the supplier of the merchandise under consideration knew or had reason to know the ultimate destination of any merchandise purchased by your company at the time of sale. For example, did you request that the supplier ship the merchandise directly to the United States; was the destination apparent from the product codes or other markings; were there product characteristics or features typical of the United States market? Was there an explicit or implicit understanding giving permission to or responsibility for exporting to the United States, or restricting, discouraging, or prohibiting sales in the home market or elsewhere? Does the supplier have the right to review your sales records? Does the supplier provide after-sales service in the United States, participate in U.S. sales calls or activities, or provide sales incentives to your customers?

c. State the currency in which your purchases from the supplier were transacted and paid.

10. Exports Through Trading Companies in Your Country

If you are aware that any of the merchandise that you sold to another company in your country was ultimately shipped to the United States, or was at the time the sale intended to be shipped to the United States, please contact the official in charge within two weeks of receipt of this questionnaire.

FORMAT FOR REPORTING QUANTITY AND VALUE OF SALES

Market	Unit of Measure	Total Quantity	Terms of Sale	Total Value
United States 1. Export Price 2. Constructed Export Price 3. Further Manufactured Total				

Values should be expressed in U.S. dollars. Indicate any exchange rates used and their respective dates and sources.

To the extent possible, sales values should be reported based on the same terms (e.g., FOB).

List the unit of measure (e.g., kilograms) of the quantity reported.

SECTION C

Sales to the United States

I. General Explanation of Section C

This section of the questionnaire provides instructions for reporting your sales of the merchandise under consideration in or to the United States. We will compare the prices at which this merchandise was sold in or to the United States with a constructed value using the **factors of production** to determine whether the merchandise was sold at less than **normal value** in the United States during the POI.

If your company did not produce the merchandise under consideration, we request that you send section D to the company that produces the merchandise under consideration and supplies it to you or to your customers.

II. Computer File of U.S. Sales

In accordance with the instructions provided in this section, prepare a separate computer data file containing each sale made during the POI of the merchandise under consideration, including sales of further manufactured merchandise. Do not report cancelled sales. This file format has been designed to accommodate **export price** ("EP") and **constructed export price** ("CEP") transactions.

Report each U.S. sale of merchandise entered for consumption during the POI, except: (1) for EP sales, if you do not know the entry dates, report each transaction involving merchandise shipped during the POI; and (2) for CEP sales made after importation, report each transaction that has a date of sale within the POI. If you believe there is a reason to report your U.S. sales on a different basis, please contact the official in charge before doing so.

If you had sample transactions, please provide the following information thereon: CONNUM, customer code, invoice date, quantity, and gross unit price (if the sample transaction was at zero value, please list zero as the unit price). Explain the circumstances under which the sample transactions were made.

For sales of merchandise that has been shipped to the customer and invoiced by the time this response is prepared, each "record" in the computer data file should correspond to an invoice line item (i.e., each unique product included on the invoice). For sales of merchandise that has not yet been shipped and invoiced (in whole or in part) to the customer, a "record" should correspond to the unshipped portion of the sale.

Each computer record submitted should contain the information requested concerning the product sold, the terms of the sale, the selling expenses incurred, and other information. The

following portion of section C describes the information the Department requires.[23]

III. Market Economy Inputs

List the movement expenses (ocean freight, marine insurance, trucking, etc.) that your company purchased from a market economy supplier and paid for in a market economy currency during the POI. For each movement expense, please report the price you actually paid for a specified quantity of inputs. For these prices, please provide the following information:

a. From which market economy country did you purchase the good and in what currency did you pay?

b. If you purchase a service from a market economy supplier, is the price you pay based on the weight or on the value of your product (e.g., the charge for marine insurance is usually based on the value of your shipment, while the charge for ocean freight is usually based on the weight of your shipment).

c. Provide all details of the transaction, including the name of the supplier, the source country, terms of payment and any other arrangements you have made.

d. Detail the percentage you purchased from a market-economy country and the percentage you purchased from a nonmarket-economy supplier.

IV. Summary of Data Fields for the U.S. Sales File

The chart which follows is a summary of the data fields for the U.S. sales computer file which are described in the remainder of this section of the questionnaire. The chart lists the field number, description and name. Please refer to Appendix II Instructions for Submitting Computer Data for instructions on preparing the electronic file.

[23] Refer also to the Instructions for Submitting Computer Data at Appendix II.

SECTION C

Summary of U.S. Sales File

FIELD NUMBER	FIELD DESCRIPTION	FIELD NAME	
1.0	Complete Product Code	PRODCODU	
2.0	Matching Control Number	CONNUMU	
3.1 -3.n	Product Characteristics		
4.0	Sale Type	SALEU	
5.0	Customer Code	CUSCODU	
6.0	Sales Invoice Date	SALINDTU	
7.0	Date of Sale (if not Invoice Date)	SALDATU	
8.0	Sale Invoice Number	INVOICU	
9.0	Date of Shipment	SHIPDTU	
10.0	Date of Receipt of Payment	PAYDATEU	
11.0	Terms of Delivery	SALETERU	
12.0	Terms of Payment	PAYTERMU	
13.1	Quantity	QTYU	

FIELD NUMBER	FIELD DESCRIPTION	FIELD NAME	
13.2	Quantity Unit of Measure	QTUMU	
14.0	Gross Unit Price	GRSUPRU	
15.1-n	Billing Adjustments	BILLADJU	
16.1	Early Payment Discounts	EARLPYU	
16.2	Quantity Discounts	QTYDISU	
16.3-16.n	Other Discounts	OTHDIS(1-n)U	
17.1-17.n	Rebates	REBATE(1-n)U	
18.1	Inland Freight - Plant to Distribution Warehouse	DINLFTWU	
18.2	Inland Freight - Plant/Warehouse to Port of Exit	DINLFTPU	
19.0	Inland Insurance	INSURU	
20.0	Brokerage and Handling	DBROKU	
20.1	Brokerage and Handling Expense	DMEBROKU	
21.0	International Freight	INTNFRU	

FIELD NUMBER	FIELD DESCRIPTION	FIELD NAME	
22.1	Port of Exportation	EXPORTU	
22.2	U.S. Port of Importation	IMPORTU	
23.0	Marine Insurance	MARNINU	
24.0	U.S. Inland Freight from Port to Warehouse	INLFPWU	
25.0	U.S. Warehousing Expense	USWAREHU	
26.0	U.S. Inland Freight from Warehouse to the Unaffiliated Customer	INLFWCU	
27.0	U.S. Inland Insurance	USINSURU	
28.0	Other U.S. Transportation Expense	USOTHTRU	
29.0	U.S. Customs Duty	USDUTYU	
30.0	Destination	DESTU	
31.0	Commissions	COMMU	
32.0	Selling Agent	SELAGENU	
33.0	Selling Agent Relationship	SELARELU	
34.0	Credit Expenses	CREDITU	
35.0	Interest Revenue	INTREVU	
36.0	Advertising Expenses	ADVERTU	
37.0	Warranty Expense	WARRU	

FIELD NUMBER	FIELD DESCRIPTION	FIELD NAME	
38.0	Technical Service Expense	TECHSERU	
39.0	Royalties	ROYALU	
40.1-n	Other Direct Selling Expenses	DIRSELU	
41.0	Indirect Selling Expenses Incurred in the United States	INDIRSU	
42.0	Inventory Carrying Costs Incurred in the United States	INVCARU	
43.0	U.S. Repacking Cost	REPACKU	
44.0	Further Manufacturing	FURMANU	
45.0	Foreign Trade Zone	FTZU	
46.0	Manufacturer	MFRU	
47.0	Entered Value	ENTVALUE	
48.0	Importer	IMPORTER	

IV. Instructions for the Narrative Response and the Computer File of U.S. Sales

The following instructions combine the questionnaire with the computer data file format. "FIELD NUMBER" includes the number and descriptive name of the field in the computer data file. "FIELD NAME" includes the "short" or variable name for the submitted printouts of the data file. "DESCRIPTION" defines the data you should report in the field of the computer data file, and "NARRATIVE" describes the additional information we request you provide, not in the computer data file, but in a narrative response.

Fields 1 through 3.
Report the information requested concerning the product sold. Fields 1 and 2 are reserved for the product code and a matching control number the Department will use in the calculation of the dumping margin. Fields numbered 3.1 to 3.9 specify the product characteristics requested by the Department. You may add additional product characteristics. However, if you add characteristics not specified in the questionnaire, describe in the narrative response why you believe that the Department should use this information to define identical and similar merchandise.

FIELD NUMBER 1.0: Complete Product Code

FIELD NAME: PRODCODU

DESCRIPTION: Report the commercial product code assigned by your company in the normal course of business to the specific product sold in the United States. If the product sold is further manufactured in the United States, report the product code of the product sold, not the product imported.

NARRATIVE: The product code should be described in response to question 6b in section A of this questionnaire.

FIELD NUMBER 2.0: Matching Control Number

FIELD NAME: CONNUMU

DESCRIPTION: Assign a control number to each unique product reported in the section C sales data file. Identical products should be assigned the same control number in each record in every file in which the product is referenced. Each unique combination of product characteristics based <u>only</u> on fields 3.1 - 3.n should be assigned a unique control number.

If the product sold is further manufactured in the United States, report the control number of the product <u>imported</u>, not the product sold.

NARRATIVE: List all CONNUMS**,** and indicate to which products they have been assigned. Include CONNUMS for all products described in Appendix III

of the questionnaire, regardless of market destination.

FIELD NUMBER 3.1:

FIELD NAME:

DESCRIPTION:

FIELD NUMBER 3.n:

FIELD NAME:

DESCRIPTION:

Fields 4 and 5.
Report the information requested concerning the sale type and customer for the merchandise.

FIELD NUMBER 4.0: Sale Type

FIELD NAME: SALEU

DESCRIPTION: Identify the sale as either "EP" (export price) or "CEP" (constructed export price).

FIELD NUMBER 5.0: Customer Code

FIELD NAME: CUSCODU

DESCRIPTION: Report the name of the customer or the internal accounting code designating the customer.

NARRATIVE: Provide a list of customer names and codes as an attachment to your narrative response.

Fields 6 through 12.

Report the information requested concerning the terms of delivery and payment and the dates of the specified events of each sale. Please be sure to report dates in the specified eight-digit format. The Glossary of Terms at Appendix I describes the Department's criteria for determining the date of sale. The criteria used by the Department to determine the date of sale may be different from the criteria you use in your accounting system; please contact the official in charge if, after reviewing the Department's criteria, you are uncertain when a sale has occurred.

FIELD NUMBER 6.0: Sale Invoice Date

FIELD NAME: SALINDTU

DESCRIPTION: Positions 1 - 4 = Year
Positions 5 & 6 = Month
Positions 7 & 8 = Day

FIELD NUMBER 7.0: Date of Sale (if different than Sale Invoice Date)

FIELD NAME: SALEDATU

DESCRIPTION: Include this field only if the date of sale is different from the sale invoice date. The appropriate date to use as date of sale should be determined in consultation with the "Official in Charge."

Positions 1 - 4 = Year
Positions 5 & 6 = Month
Positions 7 & 8 = Day

FIELD NUMBER 8.0: Sale Invoice Number

FIELD NAME: INVOICU

DESCRIPTION: Report the reference number assigned to the invoice in your accounting system.

NARRATIVE: Describe the invoice numbering system used by each sales entity that

originated a sale reported in this data file. Is it simply a sequential number or is additional information included in the code, such as point of sale? If additional information is contained in the code, provide a key describing each component of the code.

FIELD NUMBER 9.0: Date of Shipment

FIELD NAME: SHIPDTU

DESCRIPTION: Report the date of shipment from the factory or distribution warehouse to the customer.

Positions 1 - 4 = Year
Positions 5 & 6 = Month
Positions 7 & 8 = Day

FIELD NUMBER 10.0: Date of Receipt of Payment

FIELD NAME: PAYDATEU

DESCRIPTION: Report the date your records indicate payment was received from the customer.

Positions 1 - 4 = Year
Positions 5 & 6 = Month
Positions 7 & 8 = Day

NARRATIVE: Indicate the basis for determining the date of payment and the ledger from which this date was identified. If you cannot collect the dates of payment in the time allowed for responding to this questionnaire, explain why and do not complete this field. If you collect the information but a particular invoice is unpaid, enter zeros in this field for that invoice.

FIELD NUMBER 11.0: Terms of Delivery

FIELD NAME: SALETERU

DESCRIPTION: 1 = Delivered
2 = FOB
3 - n Specify other delivery terms as required.

NARRATIVE: Describe the terms of delivery offered and indicate the code used for each. The codes for delivery terms listed above are examples only. You need not use them.

FIELD NUMBER 12.0: Terms of Payment

FIELD NAME: PAYTERMU

DESCRIPTION: Report terms of payment granted the customer.

1 = 30 days after invoice.
2 = 60 days after invoice.
3- n Specify other payment terms as required.

NARRATIVE: Describe each of the terms of payment you offer and indicate the code used for each. If the terms vary by channel of distribution, explain how these are related. If the payment terms you offer are tied to early payment discounts or to interest penalties for late payment, please explain. Indicate whether the payment terms are stated or coded on each invoice or, otherwise, how customers agree to payment terms.

The codes for payment terms listed above are examples only. You need not use them.

Fields 13 through 17.
Report the information requested concerning the quantity sold and the price per unit paid in each sale transaction. All **price adjustments** granted, including **discounts** and **rebates**, should be reported in these fields. The gross unit price less price adjustments should equal the net amount of revenue received from the sale. If the invoice to your customer includes separate charges for other services directly related to the sale, such as a charge for shipping, create a separate field for reporting each additional charge. Refer to the Glossary of Terms at Appendix I for a more complete description of each of the price adjustments listed.

FIELD NUMBER 13.1: Quantity

FIELD NAME: QTYU

DESCRIPTION: Report the sale quantity for this transaction. In general, this quantity will be the quantity of the specific shipment or invoice line, net of returns where possible. For sales that have not been fully shipped/invoiced at the time the computer data for this section is prepared, report the quantity of the sale not yet shipped (total quantity sold less the quantity shipped and invoiced to date and reported in this file in separate records).

For example, assume the date of sale is the date of the customer's order. In the last month of the POI a customer orders 100 tons to be shipped in 5 lots of 20 tons each once every 30 days. At the time of preparation of your questionnaire response, 3 of the 5 shipments have been made and an invoice sent for each shipment to the customer.

The file you submit to the Department should contain 4 records: one record for each shipment and invoice and a fourth record for the unshipped amount of 40 tons. For the record containing the unshipped 40 tons, complete the adjustment fields based on estimates.

NARRATIVE: Explain how returns, if you permit them, affect your sales reported in the general ledger and sales ledger.

FIELD NUMBER 13.2: Quantity Unit of Measure

FIELD NAME: QTUMU

DESCRIPTION: Report all sales in this file in the same unit of measure. Use an abbreviation or code to indicate the unit of measure.

1 or MT = metric tons
2 or KG = kilograms
3 - n Specify as needed.

NARRATIVE: Provide a table of the units of measure and abbreviations or codes used.

Fields 14 through 17.
Report the sale price, discounts, and rebates in the currencies in which they were earned or incurred. If a field is expressed in the same currency in all records in the file, simply note the currency name on the descriptive chart requested in Appendix II Section B (Instructions for Submitting Computer Data - File Formats). However, if a revenue or expense field is expressed in one currency in certain records and another currency in other records, create a companion field that designates the currency for each record with a code or abbreviation.

FIELD NUMBER 14.0: Gross Unit Price

FIELD NAME: GRSUPRU

DESCRIPTION: Report the unit price recorded on the invoice for sales shipped and invoiced in whole or in part. To report portions of sales not yet shipped, provide the agreed unit sale price for the quantity that will be shipped to complete the order. This value should be the gross price for a single unit of measure. Discounts and rebates should be reported separately in fields numbered 16.n and 17.n, respectively.

FIELD NUMBER 15.1-n: Billing Adjustments

FIELD NAME: BILLADJU

DESCRIPTION: Report any price adjustments made for reasons other than discounts or rebates. State whether these billing adjustments are reflected in your gross unit price.

FIELD NUMBER 16.1: Early Payment Discounts

FIELD NAME: EARLPYU

NARRATIVE: Explain your policy and practice for granting each discount. Describe each type of discount granted and the basis for eligibility for such discount. Explain how you calculated each additional per-unit discount. Where available, provide sample documentation, including sample agreements, for this type of discount.

FIELD NUMBER 16.2: Quantity Discounts

FIELD NAME: QTYDISU

DESCRIPTION: Report the unit value of any discount granted to the customer due to the quantity of the purchase.

NARRATIVE: Explain your policy and practice for granting quantity discounts. Describe the basis for eligibility for such discounts. Explain how you calculated the per-unit discount. Provide your quantity discount schedule or other documentation establishing the discount program.

FIELD NUMBER 16.3(1-n): Other Discounts

FIELD NAME: OTHDIS(1-n)U

DESCRIPTION: Report the unit value of other discounts granted to the customer. Create a separate field for reporting each discount granted.

NARRATIVE: Explain your policy and practice for granting each additional discount. Describe each type of discount granted and the basis for eligibility for such discount. Explain how you calculated each additional per-unit discount. Where available, provide sample documentation, including sample agreements, for each type of discount.

FIELD NUMBER 17.1-n: Rebates

FIELD NAME: REBATE(1-n)U

DESCRIPTION: Report the unit value of each rebate given to the customer. Create a separate field for reporting each rebate granted. Rebates should be reported with the sales to which they apply.

NARRATIVE: Explain your policy and practice for granting rebates and describe each type of rebate granted. If rebates vary, explain why. For rebates that have not yet been paid, describe how you computed the amount to be rebated. Include your worksheets as an attachment to the response. Where available, provide documentation, including sample agreements, for each type of rebate.

Fields 18 through 30.

Report the information requested concerning activities undertaken to bring the merchandise from the place of manufacture to the customer's place of delivery (if f.o.b., e.g., from factory to port in country of manufacture or if c.i.f., from factory to delivery port in United States). Add fields, if needed. (Field 28 can be used for other U.S. transportation expenses not requested separately.) For merchandise which was sold during the POI but which has not been shipped at the time of preparation of the response, report estimated amounts and your basis for these estimates.

The fields listed below anticipate the types of transport activities commonly incurred on international shipments. However, it is not uncommon for certain of these transport expenses to be combined in a single fee paid a transport company (e.g., combined ocean transport and U.S. internal transport to the customer's place of delivery). If amounts are combined, do not attempt to separate them but report them in a single field and explain in your narrative response.

FIELD NUMBER 18.1: Inland Freight - Plant to Distribution Warehouse

FIELD NAME: DINLFTWU

DESCRIPTION: Report the distance in kilometers from the factory to the distribution warehouse (or other intermediate location).

NARRATIVE: Describe the transport you used to deliver the merchandise to your distribution warehouse(s) or other intermediate location. Also describe your distribution warehousing for all markets.

Surrogate freight rates used by the Department to value inland freight are generally on a truckload basis that assumes nine metric tons per truckload. If you believe that this valuation would be inappropriate, or would require some adjustment, please demonstrate, and fully explain any adjustments you suggest.

FIELD NUMBER 18.2: Inland Freight - Plant/Warehouse to Port of Exit

FIELD NAME: DINLFTPU

DESCRIPTION: Report the distance in kilometers from the plant or distribution warehouse (or other intermediate location) to the port of exit.

NARRATIVE: Describe the transport you used to deliver the merchandise to port of exit in the country of manufacture.

Surrogate freight rates used by the Department to value inland freight are generally on a truckload basis that assumes nine metric tons per truckload. If you believe that this valuation would be inappropriate, or would require some adjustment, please demonstrate, and fully explain any adjustments you suggest.

FIELD NUMBER 19.0: Domestic Inland Insurance

FIELD NAME: INSURU

DESCRIPTION: Report "Yes" if you incurred any inland insurance on shipments from the factory or distribution warehouse (or other intermediate location) to the domestic port of exit in the country of manufacture. Otherwise, report "No."

FIELD NUMBER 20.0: Brokerage and Handling

FIELD NAME: DBROKU

DESCRIPTION: Report "Yes" if you incurred any brokerage and handling charges for each sale to the United States. Otherwise, report "No."

FIELD NUMBER 20.1: Brokerage and Handling Expenses

FIELD NAME: DMEBROKU

DESCRIPTION: If you incurred any brokerage and handling charges in a market economy location, such as Hong Kong, for sales to the United States, report that per-unit expense in the currency in which it was incurred.

NARRATIVE: Identify the location, currency, and unit of measurement in which this expense is incurred. Explain how you arrived at the per-unit expense. Provide worksheets and a sample calculation.

FIELD NUMBER 21.0: International Freight

FIELD NAME: INTNFRU

DESCRIPTION: Report "Yes" if you incurred international freight expenses on shipments to the United States by a nonmarket economy carrier. If so, add fields 22.1 (EXPORTU) and 22.2 (IMPORTU) to report, for each sale, the port of exportation and the U.S. port of importation. If goods were shipped by market economy companies and charges were incurred in a market economy currency, report the unit cost of ocean freight or air freight incurred on shipments from the port of exit in the country of manufacture to the U.S. port of entry, as appropriate. Report the cost in the currency in which it was incurred. If you did not incur international freight expense, report "No."

NARRATIVE: If goods were shipped by market economy companies and charges were incurred in a market economy currency, describe how you calculated the unit cost of ocean freight and include your worksheets as attachments to the narrative response. Specify the currency.

FIELD NUMBER 22.1 Port of Exportation

FIELD NAME: EXPORTU

DESCRIPTION: Identify the port from which the merchandise was exported to the United States.

FIELD NUMBER 22.2: U.S. Port of Importation

FIELD NAME: IMPORTU

DESCRIPTION: Identify the port at which the merchandise was entered into the United States.

FIELD NUMBER 23.0: Marine Insurance

FIELD NAME: MARNINU

DESCRIPTION: Report "Yes" if marine insurance was provided by a nonmarket economy insurer for your shipments to the United States. If the insurance was purchased from a market-economy supplier and paid for in market economy currency, report the unit cost of marine insurance incurred on shipments from the port of exit in the country of manufacture to the U.S. port of entry. Report the cost in the currency in which it was incurred.

NARRATIVE: If the insurance was purchased from a market-economy supplier and paid for in market economy currency, describe how you calculated the unit cost of marine insurance and include your worksheets as attachments to the narrative response. Specify the currency.

FIELD NUMBER 24.0: U.S. Inland Freight from Port to Warehouse

FIELD NAME: INLFPWU

DESCRIPTION: For CEP sales, report the unit cost of any freight incurred on shipments from the U.S. port of entry to the affiliated reseller's U.S. warehouse or other intermediate location. For EP sales, report the unit cost of freight from the port of entry to an intermediate location.

NARRATIVE: Describe how you calculated the unit cost of inland freight in the United States and include your worksheets as attachments to the narrative response.

FIELD NUMBER 25.0: U.S. Warehousing Expense

FIELD NAME: USWAREHU

DESCRIPTION: For CEP sales, report the unit cost of warehousing expenses incurred in the United States. The cost of warehousing reported in this field should include only expenses incurred at a warehouse not located at the distribution facility that sold the merchandise. In the case of merchandise processed further in the United States, report only expenses incurred at a warehouse not located at the facility that processed the merchandise. Reduce the cost of warehousing by any reimbursement received from the customer. Warehousing expenses might be incurred if "just-in-time" delivery or inventory segregation are conditions of sale.

NARRATIVE: Describe the distribution warehousing system you operate and provide a list of the warehouse locations used to distribute the foreign like product. Describe any warehousing services provided to customers. Provide a list of customer names and codes that receive warehousing services, including the name and location of the warehouse used. Also, state whether the warehouse is operated by a separate entity that is affiliated with you and describe the nature of the affiliation.

FIELD NUMBER 26.0: U.S. Inland Freight from Warehouse to the Unaffiliated Customer

FIELD NAME: INLFWCU

DESCRIPTION: For CEP sales, report the unit cost of freight incurred on shipments from the affiliated U.S. reseller to the U.S. unaffiliated customer. For EP sales, report the unit cost of freight to the customer from the port of entry or an intermediate location.

NARRATIVE: Describe how you calculated the unit cost of freight from the warehouse or other intermediate location and include your worksheets as attachments to the narrative response.

FIELD NUMBER 27.0: U.S. Inland Insurance

FIELD NAME: USINLINU

DESCRIPTION: Report the unit cost of U.S. inland insurance incurred on shipments within the United States.

NARRATIVE: Describe how you calculated the unit cost of U.S. inland insurance and include your worksheets as attachments to the narrative response.

FIELD NUMBER 28.0: Other U.S. Transportation Expense

FIELD NAME: USOTHTRU

DESCRIPTION: Report the unit cost of any additional transportation expense incurred in the United States.

NARRATIVE: Describe the expense and how you calculated the unit cost. Include your worksheets as attachments to the narrative response.

FIELD NUMBER 29.0: U.S. Customs Duty

FIELD NAME: USDUTYU

DESCRIPTION: If terms of sale included this charge, report the unit amount of any customs duty paid on the merchandise under consideration. Include in the unit cost the U.S. customs processing fee and the U.S. harbor maintenance fee.

NARRATIVE: Describe how you calculated the unit cost of U.S. customs duties and customs fees, and include your worksheets as attachments to the narrative

response.

FIELD NUMBER 30: Destination

FIELD NAME: DESTU

DESCRIPTION: Report the U.S. postal "ZIP" code of the customer's place of delivery.

Fields 31 through 40.
FOR CEP TRANSACTIONS ONLY: Report the information requested concerning the selling expenses listed, if they are incurred in the United States. Include the expenses of any affiliated selling agents instead of the commissions paid to those agents. These expenses will be used to make adjustments for CEP deductions. Report only direct expenses in Fields 38-40. Refer to the definitions of circumstances of sale and **direct and indirect expenses** in the Glossary of Terms at Appendix I.

FIELD NUMBER 31.0: Commissions

FIELD NAME: COMMU

DESCRIPTION: Report the unit cost of commissions paid to selling agents and other intermediaries. If more than one commission was paid, report each commission in a separate field. Do not report commissions paid to affiliated selling agents unless there is a compelling reason that you cannot report an affiliated agent's actual expenses.

NARRATIVE: Describe the terms under which commissions were paid and how commission rates were determined. Explain whether the amount of the commission varies depending on the party to whom it is paid and whether that party is affiliated with you. Include samples of each type of commission agreement used.

If you report payments to any affiliated selling agent in lieu of the agent's actual expenses, provide an explanation of why you are unable to report those actual expenses. Indicate whether the commissions were paid at **arm's length** by reference to payments to unaffiliated parties in the United States, the foreign market and other markets. Submit evidence demonstrating the arm's-length nature of the commissions.

FIELD NUMBER 32.0: Selling Agent

FIELD NAME: SELAGENU

DESCRIPTION: Report the name or internal code designating the commissioned selling agent or intermediary. If more than one commission was paid, report the name and code of each selling agent in a separate field.

NARRATIVE: Provide a list of commissioned selling agents and intermediaries and an internal code for each, the applicable commission rates, and whether the agent is affiliated with you.

FIELD NUMBER 33.0: Selling Agent Relationship

FIELD NAME: SELARELU

DESCRIPTION: Report the code designating affiliation.

1 = Unaffiliated
2 = Affiliated

FIELD NUMBER 34.0: Credit Expenses

FIELD NAME: CREDITU

DESCRIPTION: Report the unit cost of credit computed at the actual cost of short-term debt incurred by your company. It is preferable to use a rate paid on short-term borrowing in U.S. dollars. If you have not borrowed in U.S. dollars, use a U.S. published commercial short-term lending rate.

This expense should be calculated and reported on a transaction-by-transaction basis using the number of days between date of shipment to the customer and date of payment. If actual payment dates are not readily accessible in your accounting system, you may base the calculation on the average age of accounts receivable. If you are paid prior to shipment the imputed benefit will be added to the price.

NARRATIVE: Provide the equation you have used to calculate credit expenses and a worksheet showing the calculation of your average short-term interest rate. Explain the calculation and any other factors that affect net credit costs, such as compensating deposits to the extent that they were a precondition for acquiring the loan. Indicate the source of the short-term interest rates used in the calculation.

FIELD NUMBER 35.0: Interest Revenue

FIELD NAME: INTREVU

DESCRIPTION: Report the per unit interest charges collected on each sale for late payment of the invoice.

NARRATIVE: Describe the conditions under which you charge customers interest. If the practice varies by channel of distribution or category of customer, explain why it varies and how.

FIELD NUMBER 36.0: Advertising Expenses

FIELD NAME: ADVERTU

DESCRIPTION: Report the unit cost of advertising specifically for the merchandise under consideration that you have paid on behalf of your customer. This is the cost you incurred to advertise to your customer's customers.

Report all advertising expenses incurred to advertise to your customers as part of indirect selling expenses (Field 41.0)

NARRATIVE: Describe separately advertising programs directed at your customer's customer (*e.g.*, co-op advertising) and advertising programs directed at your customers. Provide separate lists of the expenses incurred for each and provide worksheets demonstrating the allocation of the advertising to your customer's customer to each sale of the subject merchandise.

FIELD NUMBER 37.0: Warranty Expense

FIELD NAME: WARRU

DESCRIPTION: Report the unit cost of warranty incurred during the POI. Warranty expense should include only the direct expense less any reimbursement received from the customer or unaffiliated parts suppliers. Report indirect warranty expenses as part of indirect selling expenses (field 41.0). If you sell different models or types of the subject merchandise, warranty cost should be based upon your experience by model. If this is impractical, express warranty cost on the most product-specific basis possible.

NARRATIVE: Describe both the warranty expenses incurred on sales of this merchandise and the reimbursement, if any, received or expected from the customer. Provide lists of the direct and indirect expenses incurred and worksheets

demonstrating the allocation of the direct expense to each sale. Include a copy of each type of warranty agreement as an attachment to the response.

Include a schedule of direct and indirect warranty expenses incurred for the subject merchandise for the three most recently completed fiscal years. In addition, calculate a cost per unit for each year.

FIELD NUMBER 38.0: Technical Service Expense

FIELD NAME: TECHSERU

DESCRIPTION: Report the unit cost of technical services. Include only the direct expense less any reimbursement received from the customer. Report indirect technical service expenses as part of indirect selling expenses (field 41.0).

NARRATIVE: Describe the technical services provided, including any service, repair, or consultation that directly relate to sales of the subject merchandise. Describe any reimbursement received for these services. Provide lists of the direct and indirect expenses incurred and worksheets demonstrating the allocation of the direct expense to each sale of the subject merchandise.

FIELD NUMBER 39.0: Royalties

FIELD NAME: ROYALU

DESCRIPTION: Report the unit cost of any royalties you paid on the sale of the product. Create a separate field for each royalty paid.

NARRATIVE: Describe each royalty paid to third parties as a result of production or sale. Include a description of all royalties paid in this section of the narrative. The description should include the key terms of the agreements, the names of the parties that granted the rights, and a list of products covered by the agreements.

FIELD NUMBER: 40.1-n: Other Direct Selling Expenses

FIELD NAME: DIRSELU

DESCRIPTION: Report the unit cost of other direct selling expenses you incurred on sales of the subject merchandise which are not reported in other fields. Report each additional direct selling expense in a separate field. Include only the direct expenses incurred less any reimbursement received from the customer. Report the indirect expenses incurred as part of indirect selling expenses (field 41.0).

NARRATIVE: Describe each type of direct selling expense incurred and your basis for considering it directly related to the sales of the subject merchandise. Include lists of the direct and indirect expenses incurred and provide worksheets demonstrating any allocation of the direct expenses to each sale of the subject merchandise.

Fields 41 and 42.

FOR CEP TRANSACTIONS ONLY: Report the information requested concerning **indirect selling expenses** included in field 41 and **inventory carrying cost** in field 42. The Department will use these fields to calculate **CEP**, where appropriate. Refer to the Glossary of Terms at Appendix I for a more complete description of these.

Indirect selling expenses include all sales overhead expenses (*e.g.*, salesmen's salaries and office rent) as well as the indirect expense categories excluded from the direct expenses recorded in fields 36 through 38.

FIELD NUMBER 41.0: Indirect Selling Expenses Incurred in the United States

FIELD NAME: INDIRSU

DESCRIPTION: Report the unit cost of indirect selling expenses incurred in the United States. Where indirect selling expenses have been incurred by more than one affiliated reseller, create separate fields for the expenses of each company.

NARRATIVE: Describe the sales and administrative overhead expenses (*e.g.*, office rent, salesmen's salaries) incurred in the United States. Include a list of the overhead expenses incurred and provide worksheets demonstrating the allocation of these expenses plus the indirect expenses excluded from the circumstance of sale adjustments in fields 36 through 38 to each sale of the subject merchandise. Where more than one company incurred indirect selling expenses, submit separate worksheets for each.

FIELD NUMBER 42.0: Inventory Carrying Costs Incurred in the United States

FIELD NAME: INVCARU

DESCRIPTION: For CEP sales, report the unit opportunity cost incurred from the time of arrival in the United States until the time of shipment from the warehouse or other intermediate location in the United States to the first unaffiliated customer.

Compute the adjustment at the actual cost of U.S. dollar denominated short-term debt incurred by your company. If you have not borrowed in U.S. dollars, use a U.S. published commercial bank prime short-term lending rate.

NARRATIVE: Describe how the products under investigation are stored in the United States prior to sale and the average length of time in inventory in the United States. Indicate the source of the short-term interest rate used in the calculation. Include your worksheets as attachments to the response.

FIELD NUMBER 43.0: U.S. Repacking Cost

FIELD NAME: REPACKU

DESCRIPTION: If the product is repacked in the United States, report the unit cost of any repacking in the United States. Include the cost of labor, materials and overhead.

NARRATIVE: Describe any repacking that occurs in the United States. For each type of packing, provide a worksheet that demonstrates the calculation of packing material, labor and overhead for a single unit.

The worksheets should include a list of packing materials, the average cost of each material, and how much of each material was used. In addition, report the average labor hours by packing type and the average labor cost per hour including benefits. Include also a list of overhead expenses incurred in packing and demonstrate how these expenses were allocated to each packing type.

FIELD NUMBER 44.0: Further Manufacturing

FIELD NAME: FURMANU

DESCRIPTION: If you are required to report the cost of further manufacturing performed in the United States, record the unit cost in this field. This value is the total unit cost reported in the computer data file prepared in response to questionnaire Section E - Cost of Further Manufacturing Performed in the United States.

If you have incurred further manufacturing cost in the United States but are not required to report the cost, record the code "FM" in this field for each sale of a further manufactured product. Leave the field blank for sales of products that have not been further manufactured.

NARRATIVE: If you further manufacture the subject merchandise in the United States, please contact the official in charge immediately. You may be required to respond to Section E of this questionnaire. No additional narrative description is required for this field. Refer to Section A question 7.

FIELD NUMBER 45.0: Foreign Trade Zone

FIELD NAME: FTZU

DESCRIPTION: Identify all sales of merchandise shipped into foreign trade zones in the United States by recording the code "FTZ" in this field. If you shipped the subject merchandise to an affiliate in an FTZ that further processed the merchandise into products not within the description of merchandise in Appendix III prior to entry into U.S. customs territory, separately identify these transactions with the code "FTZA."

For merchandise that was not shipped into foreign trade zones or was entered for consumption prior to admission to a foreign trade zone, leave this field blank.

NARRATIVE: Explain the circumstances that pertained to FTZ transactions. State whether you, your U.S. affiliate, or an unaffiliated firm entered (or may have entered) the merchandise into the Customs territory of the United States.

FIELD NUMBER 46.0: Manufacturer

FIELD NAME: MFRU

DESCRIPTION: If you have sold the merchandise under consideration produced by more than one manufacturer, identify the manufacturer in each record by the use of a code. If the manufacturer is unknown, identify your supplier.

NARRATIVE: If you are not the manufacturer, report the manufacturer of the merchandise in your narrative response and provide a key to the code.

FIELD NUMBER 47.0: Entered Value

FIELD NAME: ENTVALU

DESCRIPTION: For CEP sales made after importation, report the average unit entered value (U.S. Customs value) during the POI for the specific product (*e.g.*, model) of the sale. For other sales, report the actual unit entered value (U.S. Customs value), if known. Report the entered value for all CEP sales and for EP sales for which this information is known.

FIELD NUMBER 48.0 Importer

FIELD NAME: IMPORTER

DESCRIPTION: Report the U.S. importer of record. If unknown, place the code "UNK" in this field. For CEP sales made after importation, indicate the importer of the subject merchandise entered during the POI.

NARRATIVE: Provide a list of importers of record with any codes or abbreviations you used to identify them. If you (or an affiliate) were the importer of record for any EP sale(s), please explain the circumstances. If you or an affiliate were not the importer of record for any CEP sale(s), please explain the circumstances. Also, if more than one affiliate was an importer of the subject merchandise during the POI, please explain the functions of each and the circumstances under which each imported the subject merchandise.

Other Revenues and Expenses.
If there are additional revenues or expenses that are not reported above, create a field for each in the computer file, describe the revenue or expense in you narrative response, and include all calculation worksheets as attachments to your narrative response.

SECTION D

Factors of Production Questionnaire

I. General Explanation of Section D

This section of the antidumping questionnaire instructs you on how to report the **factors of production** ("factors") of the merchandise under consideration. Please refer to the cover letter to determine your reporting requirements.

A. Factors of Production

Factors of production are used to construct the value of the product sold by your company in the United States. The Department will use the input amounts you report, along with the appropriate price from the chosen **surrogate country**, to construct the **normal value** of the merchandise under consideration sold by your company to the U.S. market. Surrogate values for overhead, selling, general and administrative ("SG&A") expenses and profit will also be added. Unless otherwise instructed by the Department, you should report factors information for all models or product types in the U.S. market sales listing submitted by you (or the exporter) in response to Section C of the questionnaire, including that portion of the production that was not destined for the United States. The reported amounts should reflect the factors of production used to produce one unit of the merchandise under consideration.

If you believe that your company uses any raw materials that should be classified as factory overhead expenses rather than valued as factors of production and directly included in normal value, please: 1) notify the Department official in charge, and 2) identify these materials in your first Section D questionnaire response. Your first Section D questionnaire response should contain a comprehensive list of all such materials you consider to be part of factory overhead. Please provide this information to the Department immediately, as this will afford your company and the Department sufficient time to evaluate your company's specific use of the raw material and to determine the most appropriate manner in which the raw material should be valued.

If you have any questions regarding how to compute the factors of the merchandise under consideration, please contact the official in charge before preparing your response to this section of the questionnaire.

B. Reporting Period for Factors of Production

Normally, you should calculate the per-unit factor amounts based on the actual inputs used by your company during the POI as recorded under your normal accounting system. If you believe that using POI factors is inappropriate (for example, because of the seasonal nature of production), or if you have any questions regarding the appropriate

calculation period, please contact the official in charge before preparing your response to this section of the questionnaire. In addition, if your company's fiscal year ends within three months of the POI and you want to report factors of production based on your company's fiscal year, please contact the official in charge before preparing your response to this section of the questionnaire.

C. Calculating Weighted-Average Factors of Production

If you produce the merchandise under consideration at more than one facility, you must report the factor use at each location. You must also report the output of the merchandise under consideration at each of the various facilities during the POI.

D. Reporting Requirements

If your company did not produce the merchandise under consideration, we request that this section be immediately forwarded to the company that produces the merchandise and supplies it to you or to your customers.

E. Reporting Factors of Production

If you are not reporting factors of production (FOPs) using actual quantities consumed to produce the merchandise under investigation on a CONNUM-specific basis, please provide a detailed explanation of all efforts undertaken to report the actual quantity of each FOP consumed to produce the merchandise under investigation on a CONNUM-specific basis. Additionally, please provide a detailed explanation of how you derived your estimated FOP consumption for merchandise under investigation on a CONNUM-specific basis and explain why the methodology you selected is the best way to accurately demonstrate an accurate consumption amount. For the most significant material input, for electricity, and for labor, please reconcile with worksheets the estimated consumption of these FOPs for a specific CONNUM to your cost-of-production (COP) ledger or the equivalent production ledger.

II. Production Process and Products

The information requested below is necessary for the Department to understand your products and production processes. We therefore ask that you provide complete and detailed narrative responses to each of the items listed below.

A. Production Process

The following questions will provide information on your company's production process:

1. Please specify whether you produce all of the merchandise under consideration on site. List the plants where the merchandise under consideration is produced.

2. Provide a detailed description of the production process utilized for the production of the merchandise under consideration. The description of the process should include, but not be limited to:

   a. A diagram of the process

   b. A technical description of each stage of the process.

   For each stage of the process you must indicate the material inputs, the processing time, the types of equipment used, the number of people involved in the process, and any subsidiary products generated as a result of the production of the merchandise under consideration.

3. Please provide a list of **all** documents (e.g., material purchase invoices, warehouse sub-ledgers, consumption worksheets, bill of materials, production notes/bills, workshop production records, warehouse slips, inventory records, monthly production worksheets, material consumption summary worksheets, yield loss reports, finished goods sub-ledgers, cost of production allocation worksheet, etc.) generated/used/relied upon in the normal course of business by the respondent/exporter/producer during each stage/workshop of the production of the merchandise under investigation and state whether actual or standard costs and quantities are recorded. This list should include **all** documents (both standard and actual production records) generated/used/relied upon during production, regardless of how or whether such information is reflected in the company's overall accounting system. Additionally, for each document, please identify how long the company normally maintains physical copies of these records.

4. Please provide a detailed explanation of any difference that may exist between the production records (both standard and actual) maintained by the company in the normal course of business by the production department, and the company's accounting records, with specific ref, the cost of production records used to tie the company's records to its financial statements.

5. Please state whether the company maintains material consumption worksheets, cost-center codes, etc. that track the monthly consumption of inputs and outputs on a product-specific basis.

B. Products

1. Report the total quantity of the merchandise under consideration produced in each facility during the POI.

2. List the products your company produces. Identify all products manufactured using

the same production facilities as the merchandise under consideration.

III. Inputs Purchased by the U.S. Customer from a Supplier in the NME Country

If your unaffiliated customer in the United States supplied you with inputs that it obtained from a supplier in the NME country where you produced the merchandise under consideration, please supply the following:

A. name of the input;

B. name and address of the NME supplier; and

C. whether you obtained the input from any other source during the POI.

IV. Market-Economy Inputs

List the inputs that your company purchased from a market economy supplier and paid for in a market economy currency during the POI. For raw material inputs and packing materials, please report the price you actually paid for a specified quantity of inputs. If you used a service (e.g., trucking) from a market economy supplier, and paid market economy currency, please report the price you actually paid for the service. For these prices, please provide the following information:

A. From which market economy country did you purchase the good and in what currency did you pay?

B. Provide all details of the transaction, including the name of the supplier, your relationship with that supplier, the source country, terms of payment and any other arrangements you have made.

C. Detail the percentage you purchased from a market-economy country and the percentage you purchased from a nonmarket economy supplier.

V. Instructions for Submitting the Factors of Production (FOP), Market-Economy Purchases (MEP), and Surrogate Values Spreadsheets

Please complete the FOP, By-Product or Co-Product Offsets, and MEP spreadsheets that appear in Appendix VI for each facility that produced, during the POI/POR (or factor reporting period, if different), models or product types of the merchandise under consideration that was sold to the United States during the POI/POR.[24] Include every factor used in the production of this merchandise, and in packing the merchandise for shipment to the United States. Please complete the By-Product or Co-Product Offsets

[24] Please provide a description of each model or product type.

spreadsheet for any by-products and co-products that were reentered into production. If you have more than one source for a factor, complete a separate line for each NME source, and one summary line for purchases from market-economy countries.

Complete the MEP Spreadsheet for factors that were produced in a market economy (regardless of where the headquarters or sales office of the producing company was located) and were purchased in a market-economy currency. If there was more than one market-economy source for a particular factor, use a separate line for each source, and calculate a weighted-average price in column M following your listing of the prices from the various sources. After completing the MEP spreadsheet, copy this weighted-average price, as recorded in column M of the MEP spreadsheet, to column P of the FOP spreadsheet.

Report all FOP, by-product or co-product offsets, and MEP quantities on a consistent basis, i.e., for the same unit of the merchandise. For example, you might report FOP or MEP for one kilogram, or one piece, of the merchandise. This should be the unit in which factors are reported in your database; if this is not the same in which factors are recorded in your books and records, please explain. Indicate the unit used at the top of the spreadsheet.

If you produce one or more intermediate products in a separate production process, and the products(s) are used in a subsequent process to produce the merchandise, provide a separate spreadsheet for each such intermediate product.

At the top of each spreadsheet is a place to indicate the date the spreadsheet was submitted to the Department. Each time you revise your questionnaire response, such as in answer to a supplemental questionnaire, and your response requires a change in your FOP, By-Product or Co-Product Offsets, or MEP spreadsheet, you must submit a revised spreadsheet with the date the revision is submitted to the Department. You are responsible for ensuring that these spreadsheets are consistent with the accompanying narrative response and any accompanying databases submitted on electronic media. If these changes do not require revisions to previously submitted databases, the spreadsheets should correspond to the most recent database submission.

Appendix VI also includes a spreadsheet for suggested surrogates. The exporter may complete this spreadsheet when filing the questionnaire response, or later in accordance with the deadlines set forth in section 351.301(c)(3) of the Department's regulations.

The Department uses MS Excel workbook (*.xls) for spreadsheets, but any other spreadsheet format is also acceptable.

VI. Instructions for Submitting the Factors Data File

In accordance with the instructions provided below, prepare a computer data file

reporting the inputs used to produce the merchandise under consideration. The file should contain factor information relating to all models or product types sold to the United States during the POI/POR.

Instructions regarding the specific information required to complete each data field for the factors information are provided below. These instructions combine the questionnaire with the computer data file format. "FIELD NUMBER" includes the number and descriptive name of the field in the computer data file. "FIELD NAME" includes the "short" or variable name for the submitted hard copy printouts of the data file. "DESCRIPTION" defines the data that you must report in the field of the computer data file, and "NARRATIVE" describes the additional information that we request you provide, not in the computer data file, but in a narrative response.

The factors file should contain information relating to all of the merchandise produced in each facility that is of the same model or product type as the merchandise sold to the United States, including the portion of production of those models or product types not destined for the United States.

FIELD NUMBER 1.0: Matching Control Number

FIELD NAME: CONNUM

DESCRIPTION: Report the unique control number assigned to the model in the U.S. sales file in Section C of this questionnaire. Unless otherwise instructed by the Department, you should ensure that your factors computer file contains a separate record for each unique product control number contained in your U.S. sales file.

Fields 2.1 through 8.0.

These fields should contain information regarding the specific factors used to produce the merchandise under consideration. Before calculating, choose a unit of measure for which you will calculate the factors (e.g., calculate factors based on the production of one metric ton of the merchandise under consideration or based on the production of one item of the merchandise under consideration). If you receive any of the inputs used in your production process for free, you must include the amount of that input used. If your company manufactured the merchandise under consideration at more than one facility, separately report the amount produced in each facility. In addition, you must provide a narrative description detailing how you computed the weighted-average factors figures.

Intermediate Products: If you manufacture or produce one or more products in a separate production process that is then used in a subsequent process to manufacture the merchandise under consideration, please contact the Official In Charge immediately.

FIELD NUMBERS 2.1-2.X: Raw Materials Amounts
FIELD NUMBERS 2.1.1.1 - 2.X.Y.1: Transport Mode
FIELD NUMBERS 2.1.1.2 - 2.X.Y.2: Distance from Raw Material Supplier to Factory

FIELD NAME: Various names

DESCRIPTION: Report each raw material used to produce a unit of the merchandise under consideration. The consumption amount must be reported on a per unit basis (e.g., per kilogram, pound, etc.)

For each raw material, report the means of transport (e.g. rail, truck) used to move the raw material input from the supplier(s) to the factory, according to the codes listed below. If multiple transport modes are used, report each mode as a separate variable.

T = Truck
R = Rail
B = Boat, barge, or other inland waterway vessel
S = Ocean-going vessel
A = Airplane

For each mode of transportation used, report the distance (in kilometers) from the supplier of the material to the factory. If multiple suppliers are used for a raw material, report the weighted-average distance (please refer to Appendix IX for guidance). However, please note that since the Department has not determined the source it will use as a basis to value the factors of production, including packing factors, please provide both a *Sigma* capped and uncapped weighted average freight distances for all

your FOPs and packing factors. Please refer to Appendix IX for an example and further guidance in applying the Sigma cap for weighted average freight distances.

For example:

2.1	IRONORE	Iron ore material consumed
2.1.1.1	IRONMOD1	First transport mode
2.1.1.2	IRONDIS1	Distance transported via first mode
2.1.2.1	IRONMOD2	Second transport mode
2.1.2.2	IRONDIS2	Distance transported via second mode

NARRATIVE: Describe the method used to calculate the reported amounts and provide supporting worksheets that show your calculation for each material input. If any raw material amounts are reduced because of recycled scrap, provide the names of those inputs and the reduction made. In addition, on a separate sheet, please detail the means of transport (e.g. rail, truck) and the distance each material traveled from the supplier to your factory. If you have multiple suppliers, please provide the distance from each supplier to your factory, and the percentage amount purchased from each supplier. Describe each type and grade of material used in the production process.

Surrogate freight rates used by the Department to value inland freight are generally on a truckload basis that assumes nine metric tons per truckload. If you believe that this valuation would be inappropriate, or would require some adjustment, please demonstrate, and fully explain any adjustments you suggest.

FIELD NUMBER 3.0: Direct Labor Hours

FIELD NAME: DIRLAB

DESCRIPTION: Report the direct labor hours required to produce a unit of the merchandise under consideration. Note that these should be the actual direct labor hours worked, not standard labor times. Direct labor should include all production workers, inspection/testing workers, relief workers, and any other workers directly involved in producing the merchandise. In addition, your reported direct labor hours should include the hours worked by any contract labor hired by your company to assist in the production of the merchandise.

NARRATIVE: Describe the allocation of direct actual labor hours to the production of merchandise under consideration and provide supporting worksheets that

show this allocation.

FIELD NUMBER 4.0: Indirect Labor Hours

FIELD NAME: INDLAB

DESCRIPTION: Report the indirect labor hours required to produce a unit of the merchandise under consideration. Indirect labor includes all workers not previously reported who are indirectly involved in the production of the merchandise under consideration.

NARRATIVE: Describe the allocation of indirect labor hours to the production of merchandise under consideration and provide supporting worksheets that show this allocation. In addition, describe how you determined that labor was indirect. Report any other labor that you have not included.

FIELD NUMBER 5.1 - 5.n: Energy Inputs

FIELD NAME: Various

DESCRIPTION: Report each type of energy used (e.g., electric, water, gas, coal, etc.) to produce one unit of the merchandise under consideration. If you used a fuel to generate electricity, please report the fuel actually used.

NARRATIVE: Discuss how you calculated the reported energy usage and provide supporting worksheets. Also, please discuss your use of energy. How important is energy in your production process? Also, if the energy input, such as coal diesel fuel, or gasoline, is transported to your factory, please report the distance from the supplier(s) to the factory in the same manner as requested above for material inputs. Please report any additional expenses (besides its transportation) you incur in acquiring any energy input.

FIELD NUMBERS 6.1 - 6.n: By-products or Co-Products

FIELD NAME: Various

DESCRIPTION: Please note: By-product/co-product offsets are only granted for merchandise that is either sold or reintroduced into production during the POI/POR, up to the amount of that by-product/co-product actually produced during the POI/POR. If you are claiming a by-product or co-product offset in your FOP database, please report each by-product or co-product in a separate field. Further, in your narrative response, please:

i. Provide a description of the by-product/co-product;

ii. Provide an explanation why you have defined the products as by-products or co-products, as applicable;

iii. Complete the Excel chart at Appendix VI, identifying, by month, the quantity produced, sold, reintroduced into production, or otherwise disposed of (*e.g.*, sold, returned to production of the merchandise under consideration, discarded). You should complete a separate chart for each by-product or co-product.

iv. Provide production records demonstrating production of each by-product/co-product during one month of the POR. (Where possible, provide records for the same month for each by-product/co-product for which an offset is claimed);

v. Provide evidence of the disposition of the by-products/co-products:

1. If **sold,** provide evidence of the sales (*e.g.,* invoices or internal records demonstrating the sale), as well as evidence of receipt of payment for the sale of the item for the **largest month of sales** for each by-product/co-product;

2. If **reintroduced into production**, provide production records demonstrating this for the **largest month of consumption** for each by-product/co-product;

vi. Provide a detailed explanation of how you derived the claimed offset amount for each claim; and

vii. Provide the calculations used to derive each claimed amount.

If the by-product for which you are claiming an offset is a downstream by-product, in addition to responding to the items above, please also:

i. Provide the per-unit usage rate of each input used to produce the downstream by-product; and

ii. Provide a detailed narrative description of the production process used to generate the downstream by-product.

FIELD NUMBER 7.1 - 7.n: Packing Materials

FIELD NAME: Various

DESCRIPTION: Report in separate columns each type of packing material and the quantity used to pack a unit of the merchandise under consideration for export to the United States.

NARRATIVE: Describe the method used to pack the merchandise under consideration for shipment to the United States. In addition, on a separate sheet, please detail the means of transport (e.g. rail, truck) and the distance each packing material traveled from the supplier to your factory or other packing location. If you have multiple suppliers, please provide the distance from each supplier to your factory or packing location, and the percentage amount purchased from each supplier. Describe each type and grade of material, as appropriate, used in the packing process.

FIELD NUMBER 8.0: Packing Labor

FIELD NAME: PAKLAB

DESCRIPTION: Report in separate columns the labor hours necessary for packing a unit of the merchandise under consideration for export to the United States.

NARRATIVE: Describe the allocation of packing labor hours to the production of merchandise under consideration.

FIELD NUMBER 9.0: Inland Freight - Plant to Port of Exit or Transfer of Goods Location

FIELD NAME: DINLFT

DESCRIPTION: Report the distance in kilometers from the plant to the port of exit or other location where the purchaser takes possession of the merchandise.

NARRATIVE: Identify the location(s) to which the merchandise is transported. Describe the transport you used to deliver the merchandise to the location(s).

Surrogate freight rates used by the Department to value inland freight are generally on a truckload basis that assumes nine metric tons per truckload. If you believe that this valuation would be inappropriate, or would require some adjustment, please demonstrate, and fully explain any adjustments you suggest.

SECTION E

Cost of Further Manufacture or Assembly Performed in the United States

I. General Explanation of Section E Questionnaire

This section of the antidumping questionnaire provides instructions for reporting the costs incurred for **further manufacture or assembly** of the subject merchandise in the United States.

If you have questions concerning any part of the Section E questionnaire, you are instructed to contact the official in charge. Please note, however, that requests by your company to alter the reporting of the information requested in the Section E questionnaire should be submitted in writing to the Department.

A. Cost of Further Manufacture or Assembly

Further manufacture or assembly ("further manufacturing") costs include amounts incurred for direct materials, labor and overhead, plus amounts for general and administrative expenses, interest expenses, additional U.S. packing expenses, and all costs involved in moving the product from the U.S. port of entry to the further manufacturer. The summation of the U.S. further manufacturing costs that you report in response to this section of the questionnaire must be reported in data field 44.0 of your company's U.S. sales listing submitted in response to section C of this questionnaire.

B. Reporting Period for Further Manufacturing Costs

The further manufacturing costs that you report should be calculated based on the actual costs incurred by your U.S. affiliate (the "company") during the POI, as recorded under its normal accounting system.[25] If you have any questions regarding the appropriate cost calculation period for the subject merchandise, please notify the Department in writing before preparing your response to this section of the questionnaire.

C. Weighted-Average Further Manufacturing Costs

[25] If your company's fiscal year ends within three months of the end of the POI, however, you may contact the official in charge to determine whether you can report further manufacturing costs based on the company's fiscal year.

The further manufacturing costs that you report should be calculated on a weighted-average basis using as the weighting factor the model-specific production quantity for the product sold in the United States. If you further manufactured the subject merchandise at more than one U.S. facility, you must report the weighted-average of the further manufacturing costs from all such facilities. If you have any questions regarding how to compute the weighted-average further manufacturing costs for the subject merchandise, please notify the Department in writing before preparing your response to this section of the questionnaire.

II. General Information

The production process, financial accounting, and cost accounting information requested below is necessary in order for the Department to better understand your company's operations, its products and production processes, and its financial and cost accounting practices. We therefore ask that you provide complete and detailed narrative responses to each item listed below.

A. Products and Production Process

Provide a description of the further manufacturing process for the subject merchandise shipped to the United States.[26] Your description should address each of the items listed below.

1. Describe the U.S. production facilities used to further manufacture the merchandise under consideration. If further manufacturing operations take place at more than one facility, identify each facility and describe the production activities that take place at each facility.

2. Identify all products manufactured using the same production facilities used to further manufacture the subject merchandise.

3. Provide a flowchart that details the complete U.S. production cycle for the subject merchandise. This should include descriptions of each stage of production and the locations of primary cost centers.

4. Provide a description of how the company keeps account of processing yields or losses throughout the further manufacturing production cycle. Indicate each stage in the production cycle where processing yields are measured.

---

[26] Please note that if you have already provided a description of your company's production process in response to section A of this questionnaire, you may repeat that description or refer to the page numbers in that part of your response where the information is presented. Please ensure, however, that your response addresses each of the items noted in parts II.A.1 through 6 of this section of the questionnaire. If it does not, you should provide a description of your company's production process in this section of your response and supplement it accordingly with the requested information.

5. List the inputs used to further manufacture the subject merchandise, including specific types of raw materials, labor, electricity or other power supply, machinery and equipment, and subcontractor services. Indicate whether any of these materials or services were purchased from an affiliated party (*i.e.*, **affiliated person**). For each input received from an affiliated party, provide the name of the affiliated party and, if you have not already done so in response to section A of this questionnaire, state the nature of the affiliation.

6. List the significant production inputs received from affiliated parties and used to further manufacture the subject merchandise during the cost calculation period. For each input identified, provide the following information:

   a. the total volume and value of the input purchased from all sources by your company during the cost calculation period, and the total volume and value purchased from each affiliated party during the same period;

   b. the unit transfer price charged for the input by the affiliated party (if the affiliated party sells the identical input to other, unaffiliated purchasers, provide the price paid for the input by the unaffiliated purchaser; if your company purchases the identical input from unaffiliated suppliers, provide the price you paid to the unaffiliated party for the input); and

   c. state the basis used by your company (*e.g.*, transfer price or cost) to value each of the inputs received from affiliates:

      1. in your company's normal books and records; and,

      2. for purposes of computing the further manufacturing costs provided in your response to this section of the questionnaire.

B. Financial Accounting Systems and Policies

Describe your company's financial accounting practices and the system it uses to accumulate and summarize accounting data for purposes of preparing financial statements. Your description should address each of the items listed below.

1. State whether your company's financial accounting practices are in accordance with generally accepted accounting principles ("GAAP") in the United States.

2. Provide a narrative and flowchart illustrating the company's basic financial accounting books and record keeping system. Indicate in your flowchart all subsidiary ledgers, including raw materials, inventory, and sales and accounts receivable ledgers. Show in your flowchart how data from the company's financial accounting system are summarized in its financial statements.

C. Cost Accounting

Provide narrative responses to the following questions as they relate to each affiliate that performs further manufacturing of the subject merchandise. This information will provide us with an understanding of the cost accounting system used by the company in its normal course of business.

1. Describe the company's cost accounting system and how it is used to classify, allocate, aggregate, and record the costs incurred to further manufacture the subject merchandise. Your description should be provided in narrative form and should include a flow chart that 1) illustrates how the system records and reports costs for the merchandise throughout the production process, and 2) shows the various subsidiary cost ledgers maintained under the system and how they reconcile to the company's normal financial statement data.

2. Provide a list of all direct, indirect, and common cost centers. Briefly describe the operations that take place at each of these cost centers. For direct cost centers, describe how the production costs are accumulated and charged to the merchandise produced. For indirect and common cost centers, describe how the costs incurred are accumulated and allocated to the direct cost centers.

3. Describe the level of product specificity over which the company's cost accounting system normally captures production costs. Explain how the product-specific costs as recorded in the company's normal accounting system compare to the product-specific costs reported for further manufacturing.

4. State whether the company's cost accounting system accumulates costs for the subject merchandise based on the actual production costs incurred or on standard or budgeted costs. If the company's cost accounting system is based on standard or budgeted costs, then provide the following information:

   a. the variances recorded under the company's cost accounting system and how they are used by management in the normal course of business (for each variance, identify the level of product specificity for which the variance is measured);

   b. the period for which the company computes and records each variance;

   c. the methods used to develop each variance used in the company's cost accounting system;

   d. the frequency with which the company revises its standard or budgeted costs, including the date on which the latest revision was made; and

   e. the disposition of favorable or unfavorable variances (including under- or over-applied overhead) resulting from production operations during each accounting

period (*e.g.*, charge to cost of sales, prorate between cost of sales and inventory balances).

5. List and describe all production costs incurred by the company that are valued differently for cost accounting purposes than for financial accounting purposes.

III. Response Methodology

The per-unit further manufacturing cost figures that you provide in response to this section of the questionnaire must reconcile to the actual costs reported in the company's cost accounting system and to accounting records used by the company to prepare its financial statements. If the company normally uses a cost accounting system based on actual costs, you should use that system for purposes of computing your submitted further manufacturing cost amounts. Similarly, if the company uses a standard cost accounting system, you should use that system for purposes of computing further manufacturing costs. In such case, however, you must also ensure that you have allocated to the further manufacturing costs all variances resulting from differences between standard and actual production costs.

You should compute the per-unit cost of further manufacture based on your company's normal accounting records. If you do not intend to use the company's normal accounting system and cost allocation methods to compute further manufacturing cost for the subject merchandise, you must notify the Department in writing before preparing your response to this section of the questionnaire.

A. Description of Response Methodology

Provide a narrative description of the methodology that you used to compute the company's submitted further manufacturing costs. Your description should address the items listed below.

1. Describe how you used the company's normal cost and financial accounting records to compute the per-unit further manufacturing cost figures reported in response to this section of the questionnaire. Include in your description a discussion of how you used the company's accounting system and actual cost and financial accounting data to compute each of the following cost elements relating to the submitted further manufacturing cost figures:

   a. direct materials;
   b. direct labor;
   c. factory overhead (provide a list of the cost categories that comprise your submitted factory overhead cost figures);
   d. research and development ("R&D") costs;
   e. general and administrative expenses (including a list of all miscellaneous income and expense items); and

f. net interest expense (including a list of all interest income and expense items and other financing amounts used to compute net interest expense).

2. List and describe in detail all differences between costs computed under the company's normal cost and financial accounting systems and the costs submitted in response to this section of the questionnaire. Include in your description the reasons why it was necessary for you to depart from the company's normal accounting practices in order to compute the submitted further manufacture costs.

B. Worksheets

Provide the worksheets requested below that illustrate how your company calculated the per-unit further manufacturing costs submitted in response to this section of the questionnaire. Additional instructions regarding how to calculate specific cost elements for further manufacturing costs are provided in part IV, Instructions for Submitting Further Manufacturing Cost Data File, of this section.

1. For the further manufactured product with the highest U.S. market sales volume during the POI, provide worksheets that demonstrate how your company computed direct materials, direct labor, and fixed and variable overhead costs for the submitted further manufacturing cost figure(s). If your company relies on a standard cost accounting system, the worksheets that you prepare should show how you allocated any cost variances in deriving actual production costs.

2. Provide a worksheet that demonstrates how you computed your company's general and administrative (G&A) expense ratio. The worksheet that you provide should demonstrate how the G&A expenses used for your ratio calculation reconcile to your company's financial statements.

3. Provide a worksheet that demonstrates how you computed your company's net interest expense ratio. The worksheet that you provide should demonstrate how the interest income and expense figures used for your ratio calculation reconcile to your company's financial statements.

IV. Instructions for Submitting Further Manufacturing Cost Data File

In accordance with the instructions provided below, prepare a computer file reporting the costs incurred to further manufacture the subject merchandise in the United States. Instructions regarding the specific information required to complete each data field for the further manufacturing cost file are provided below. These instructions combine the questionnaire with the computer data file format. "FIELD NUMBER" includes the number and descriptive name of the field in the computer data file. "FIELD NAME" includes the "short" or variable name for the submitted hard copy printouts of the data file. "DESCRIPTION" defines the data that you must report in the field of the computer data file.

Fields 1.0 - 2.0.
For each file record, report in these fields the product code for each further manufactured product and the matching control number for each unique model of the subject merchandise that was further manufactured in the United States. This information should allow the Department to match the detailed further manufacturing cost data to the total further manufacturing cost data provided in your response to section C of this questionnaire.

FIELD NUMBER 1.0: Complete Product Code

FIELD NAME: PRODCODU

DESCRIPTION: Report the commercial product code assigned by the company in the normal course of business to the specific further manufactured product sold in the United States.

FIELD NUMBER 2.0: Matching Control Number

FIELD NAME: CONNUMU

DESCRIPTION: Report the unique control number assigned to the model (as imported) from the U.S. sales files in your response to section C of this questionnaire. Unless otherwise instructed by the Department, you should ensure that your further manufacturing cost computer file contains a record for each unique product control number contained in the U.S. sales file which required further manufacturing in the United States.

FIELD NUMBER 2.1: Production Quantity

FIELD NAME: PRODQTY

DESCRIPTION: Report the quantity produced during the cost calculation period.

Field 2.2
In certain circumstances it may be necessary to use this field to provide a separate identifying variable(s) which will link the sale of each product which is further manufactured in the U.S. to the product(s) as imported. For example, if the company imports multiple parts which are assembled into a single product sold in the U.S., this field would be used to report a code which will specifically identify these parts to the U.S. sale. If a single product is imported and then further manufactured into multiple U.S. products, the sale of each of these U.S. products must be linked to the single imported product. The variable(s) reported in this field should also appear in the company's U.S. sales database reported in response to section C of the questionnaire.

FIELD NUMBER 2.2: Linking Variables

FIELD NAME: LINKVAR

DESCRIPTION: Report the identifying variable which will link the further manufacturing cost record to the corresponding sale or sales in the U.S. sales file.

Fields 3.0 through 6.0.
These fields should contain information regarding the specific cost elements incurred to further manufacture the subject merchandise in the United States. The further manufacturing costs include direct materials and fabrication costs actually incurred by the company. If the company performed further manufacturing operations for the subject merchandise more than one facility, the amounts reported for COM should be based on the weighted-average manufacturing costs from all facilities.

FIELD NUMBER 3.0: Direct Materials Cost

FIELD NAME: FURMAT

DESCRIPTION: Report the costs incurred for direct materials used to further manufacture the subject merchandise. This should include transportation charges and other expenses normally associated with obtaining the materials that become an integral part of the finished product sold in the United States. Direct materials costs include only the costs incurred for materials added in the United States and not the cost of the imported subject merchandise. However, in addition to the cost of all direct materials added in the United States, you should include in this field the costs incurred for 1) all movement charges incurred to transport the subject merchandise from the port of entry to the company's U.S. further manufacturing facilities, and 2) the actual costs incurred for any yield loss in connection with the further manufacture of the subject merchandise in the United States. (Note that you should compute the amount of any yield loss taking into account both the cost of the imported subject merchandise and the costs incurred for U.S. further manufacturing.)

FIELD NUMBER 4.0: Direct Labor Costs

FIELD NAME: FURLAB

DESCRIPTION: Report the direct labor costs incurred to further manufacture the subject merchandise. Direct labor should include the costs incurred for all production workers, inspection/testing workers, relief workers, and all other workers directly involved in further manufacturing the subject merchandise in the United States. Direct labor should consist of the workers' base pay, overtime pay, incentive wages, shift differentials, bonuses, and all other form of wages or benefits paid to them by the company (*e.g.*, vacation, holidays, sick pay, insurance, government mandated social programs). In addition, your reported direct labor costs should include the full amount incurred for all contract labor hired by the company to further manufacture of the merchandise.

FIELD NUMBER 5.0: Factory Overhead Costs

FIELD NAME: FURFOH

DESCRIPTION: Report the factory overhead costs incurred to further manufacture the subject merchandise. Overhead costs may include costs incurred for indirect materials, indirect labor, and manufacturing utilities, as well as costs incurred for building or equipment rental, depreciation, supervisory labor, plant property taxes, factory administrative costs, and all other variable or fixed costs associated with packing the further manufactured merchandise. In addition, R&D costs that relate specifically to the further manufacturing operations should normally be included in overhead.

FIELD NUMBER 6.0: Total Production Cost

FIELD NAME: FURCOM

DESCRIPTION: Report the total production costs incurred to further manufacture the subject merchandise computed as the sum of data fields 3.0 through 5.0.

Fields 7.0 and 8.0
These fields should contain information regarding general and administrative ("G&A") expenses and net interest expense incurred in connection with the further manufacture of the subject merchandise in the United States.

FIELD NUMBER 7.0: General and Administrative Expenses

FIELD NAME: FURGNA

DESCRIPTION: Report the per-unit G&A expenses incurred by the company in connection with the U.S. further manufacture of the subject merchandise. G&A expenses are those period expenses that relate to the general production operations of the company rather than directly to the production process for the subject merchandise. G&A expenses include amounts incurred for general R&D activities, executive salaries and bonuses, and other operations relating to the company's U.S. corporate headquarters. You should also include in your reported G&A expenses an amount for administrative services performed on the company's behalf by its parent company or other affiliated party.

You should compute G&A expenses on an annual basis as a ratio of the company's total G&A expenses divided by its cost of sales (less the cost of the imported subject merchandise). In calculating the company's G&A ratio, you should rely on full-year G&A expense and cost of sales figures reported in the company's audited financial statements for the year that most closely corresponds to the POI. To compute the amount of per-unit G&A expense, you should multiply the G&A expense ratio by the per-unit further manufacturing cost for the subject merchandise.

FIELD NUMBER 8.0: Net Interest Expense

FIELD NAME: FURINT

DESCRIPTION: Report the per-unit net interest expense incurred by the company in connection with the further manufacture of the subject merchandise. You should compute net interest expense on an annual basis as a ratio of the company's total net interest expense divided by its cost of sales (net of the cost of the imported merchandise under consideration). In calculating the company's net interest ratio, you should rely on full-year net interest expense and cost of sales figures reported in the company's audited financial statements for the year that most closely relates to the POI. If the company is a member of a consolidated group of companies, then you should base your interest expense calculation on the consolidated financial statements of the group. To compute the amount of per-unit net interest expense, you should multiply the net interest expense ratio by the per-unit further manufacturing cost of the subject merchandise.

FIELD NUMBER 9.0: Total Further Manufacturing Costs

FIELD NAME: TOTFMG

DESCRIPTION: Report the unit total further manufacturing costs incurred for the product sold in the U.S. market. You should compute this amount as the sum of data fields 6.0 through 8.0.

APPENDIX I

GLOSSARY OF TERMS

This glossary is intended to provide parties with a basic understanding of many technical terms that appear in the antidumping questionnaire. These explanations are not regulations or rules with the force of law. As difficult or detailed questions arise, parties should seek clarification from the statute, regulations, and the Department, rather than attempting to derive precise guidance from these general explanations.

Administrative Protective Order

An administrative protective order is the legal mechanism by which the Department controls the limited disclosure of business proprietary information to representatives of interested parties. The Department authorizes the release of proprietary information under administrative protective order only when the representatives file a request in which they agree to the following four conditions: (a) to use the information only in the antidumping proceeding, (b) to secure the information and protect it from disclosure to any person not subject to an administrative protective order, (c) to report any violation of the terms of the protective order, and (d) to acknowledge that they may be subject to sanctions if they violate the terms of the order. (Section 777(c) of the Act. See also **Proprietary Information** and **Proprietary Treatment**.)

Affiliated Persons

The term affiliated persons (affiliates) includes: (1) members of a family; (2) an officer or director of an organization and that organization; (3) partners; (4) employers and employees; (5) any person directly or indirectly owning, controlling, or holding with power to vote, 5 percent or more of the outstanding voting stock or shares of any organization and that organization; 6) two or more persons directly or indirectly controlling, controlled by, or under common control with, any person; and (7) any person who controls any other person and that other person. "Control" exists when a person is legally or operationally in a position to exercise restraint or direction over another person. For purposes of this investigation or review, a control relationship should also have the potential to affect decisions concerning the production, pricing, or cost of the merchandise under investigation or review. (Section 771(33) of the Act; sections 351.102(b) and 351.401(f) of the regulations.)

Examples of situations which may indicate "control" include (but are not limited to):
(a) joint ventures and franchises; (b) lender/borrower situations; (c) a close relationship with a supplier, (sub) contractor, lender, distributor, exporter or reseller; and (d) a group of companies controlled by, for example, a family, a corporation, or the same investors.

An example of affiliation by common control may be the affiliation between the owners of a

joint venture when each owner is in a control position with that joint venture.

Section 351.102(b) of the Department's regulations states that the term "person" includes any interested party as well as any other individual, enterprise, or entity, as appropriate. In the Department's practice, the term "person" includes any company, individual, organization, partnership or group.

Antidumping Law and Regulations

The United States antidumping laws are set forth in Title VII of the Tariff Act of 1930, as amended ("the Act") (19 U.S.C. 1673 *et seq.*). The Department's regulations governing antidumping proceedings are set forth at 19 CFR Part 351, published in the *Federal Register* on May 19, 1997 (62 FR 27379-27424). For procedures governing Administrative Protective Orders and the treatment of proprietary information, please see 19 CFR Part 351.105, 351.304, 351.305 and 351.306, published in the *Federal Register* on May 4, 1998 (FR 24391).

Certification of Accuracy

Any person that submits factual information to the Department must include with the submission a certification of the completeness and accuracy of the factual information. Certifications must be made by a knowledgeable official responsible for presentation of the factual information and by the party's legal counsel or other representative, if any. A sample certification form is included as Appendix IV to the questionnaire. (Section 782 (b) of the Act; section 351.303(g) of the regulations.)

Constructed Export Price
(See **Export Price and Constructed Export Price**.)

Date of Sale

Because the Department attempts to compare sales made at the same time, establishing the date of sale is an important part of the dumping analysis. The Department will normally use the date of invoice, as recorded in the exporter or producer's records kept in the ordinary course of business. However, the Department may use a date other than the date of invoice (*e.g.*, the date of contract in the case of a long-term contract) if satisfied that a different date better reflects the date on which the exporter or producer establishes the material terms of sale (*e.g.*, price, quantity). (Section 351.401(i) of the regulations.)

Discounts

A discount is a reduction to the gross price that a buyer is charged for goods. Although the discount need not be stated on the invoice, the buyer remits to the seller only the face amount of the invoice, less discounts. Common types of discounts include early payment discounts, quantity discounts, and loyalty discounts.

Dumping

Dumping occurs when imported merchandise is sold in, or for export to, the United States at less than the normal value of the merchandise. The dumping margin is the amount by which the normal value exceeds the export price or constructed export price of the subject merchandise. The weighted-average dumping margin is the sum of the dumping margins divided by the sum of the export prices and constructed export prices.

Export Price and Constructed Export Price

Export price and constructed export price refer to the two types of calculated prices for merchandise imported into the United States. The Department compares these prices to normal values to determine whether goods are dumped. Both export price and constructed export price are calculated from the price at which the subject merchandise is first sold to a person not affiliated with the foreign producer or exporter.

Generally, a U.S. sale is classified as an export price sale when the first sale to an unaffiliated person occurs before the goods are imported into the United States. Generally, a U.S. sale is classified as a constructed export price sale when the first sale to an unaffiliated person occurs after importation. However, if the first sale to the unaffiliated person is made by a person in the United States affiliated with the foreign exporter, constructed export price applies even if the sale occurs prior to importation.

Factors of Production

For nonmarket economy countries, the usual bases for calculating normal value are not appropriate. Instead, the Department constructs a normal value using the nonmarket economy producer's factors of production. The factors of production include, but are not limited to, (1) the hours of labor required to produce the merchandise, (2) the quantities of raw materials employed, (3) the amounts of energy and other utilities consumed, and (4) representative capital costs, including depreciation. These factors of production are then usually valued in a market economy country that is at a level of economic development comparable to that of the nonmarket economy country and is a significant producer of the subject merchandise or of comparable merchandise. (Section 773(c)(3) of the Act.)

Facts Available

The Department seeks to make its antidumping determinations on the basis of responses to its antidumping questionnaires. However, for a variety of reasons, the data needed to make such determinations may be unavailable or unusable. In such instances, the law requires the Department to makes its determinations on the basis of "the facts otherwise available" (more commonly referred to as "the facts available"). More specifically, the Department must use the facts available if necessary information is not available on the record of an antidumping proceeding. In addition, the Department must use the facts available where an interested party or

any other person: (1) withholds information requested by the Department; (2) fails to provide requested information by the requested date or in the form and manner requested; (3) significantly impedes an antidumping proceeding; or (4) provides information that cannot be verified.

In selecting the information to use as the facts available, the law authorizes the Department to make an inference which is adverse to an interested party if the Department finds that party failed to cooperate by not acting to the best of its ability to comply with a request for information. However, the law also provides that when the Department relies on secondary information rather than on information obtained in the course of an antidumping proceeding, the Department must, to the extent practicable, corroborate that information from independent sources that are reasonably at the Department's disposal.

The Department will consider using submitted information that does not meet all of the Department's requirements if: (1) the information is submitted within applicable deadlines; (2) the information can be verified; (3) the information is not so incomplete that it cannot serve as a reliable basis for a determination; (4) the party establishes that it acted to the best of its ability; and (5) the Department can use the information without undue difficulties. Finally, if an interested party promptly informs the Department of difficulties it is having in responding to a request for information, the Department will consider modifying its request to the extent necessary to avoid imposing an unreasonable burden on the party. (Sections 776 and 782(c)-(e) of the Act; section 351.308 of the regulations.)

Further Manufacturing Adjustment

In calculating constructed export price, the Department normally deducts from the price of the merchandise sold in the United States the cost of any further manufacture or assembly performed in the United States by, or for, the exporter or an affiliate. However, if the value of the further processing is likely to exceed substantially the value of the subject merchandise as imported, the Department may instead use an alternative basis for the constructed export price. If possible, the Department would use the price of subject merchandise sold to an unaffiliated customer by the producer, exporter, or affiliated seller. If there is an insufficient quantity of such sales, the Department may rely on any other reasonable basis. (Sections 772(d)(2) and 772(e) of the Act; sections 351.402 (b) and (c) of the regulations.)

Market-Oriented Industry

The Department may find a market-oriented industry exists when it finds that in an entire industry: (1) there is virtually no government involvement in setting prices or amounts produced; (2) it is a privately or collectively owned industry; and (3) market-determined prices are paid for all significant inputs.

Such a decision is based on information provided by the nonmarket economy exporters and producers. If an industry is found to be a market-oriented industry, the normal value will be calculated on the basis of home market or third country prices or costs. That industry would also

be subject to a countervailing duty investigation should one be petitioned and initiated.

Nonmarket Economy

A nonmarket economy country is any country that the Department determines does not operate on market principles. The Department considers the following factors about a foreign country in making these decisions: (1) the extent to which the currency is convertible; (2) the extent to which wage rates are determined by free bargaining between labor and management; (3) the extent to which joint ventures or foreign investment are permitted; (4) the extent of government ownership or control of means of production; (5) the extent of government control over allocation of resources and over the price and output decisions of enterprises; and (6) other factors the Department considers appropriate. (Section 771(18)(B) of the Act.)

Normal Value

In a case involving merchandise produced in a nonmarket economy country, normal value is constructed using the factors of production methodology (see also **Factors of Production** and **Surrogate Country.**) The Department compares the normal value to the export price or constructed export price to determine the margin of dumping, if any. (Sections 773(a) and 773(c) of the Act.)

Proprietary Information

Proprietary information is sensitive business data that would cause substantial harm to the submitter if disclosed publicly. Examples of information that the Department normally treats as proprietary, if requested and not already in the public domain, include trade secrets concerning the production process, production and distribution costs, terms of sale, individual prices, and the names of customers and suppliers.

Proprietary Treatment

If a party requests proprietary treatment of information, and if the Department agrees that the information is proprietary, the Department will protect the information from public disclosure. If the Department does not agree that the information is proprietary, it will return the information and not rely on it in the proceeding, unless the submitter agrees that it may be made public. The Department will disclose proprietary information only to United States International Trade Commission and United States Customs Service officials and, under limited administrative protective orders, representatives of interested parties. (Section 777(b) of the Act. See also **Administrative Protective Order**.)

Rebates

Similar to discounts, rebates are reductions in the gross price that a buyer is charged for goods. Unlike discounts, rebates do not result in a reduction in the remittance from the buyer to the seller for the particular merchandise with which the rebate is associated. Rather, a rebate is a

refund of monies paid, a credit against monies due on future purchases, or the conveyance of some other item of value by the seller to the buyer after the buyer has paid for the merchandise. When the seller establishes the terms and conditions under which the rebate will be granted at or before the time of sale, the Department reduces the gross selling price by the amount of the rebate. (See also **Discounts**.)

Separate Rates

The Department calculates one rate for all companies in a nonmarket economy country. However, if an exporter demonstrates that it is independent of government control, it can receive an individually calculated antidumping duty rate. This separate rate is calculated using the U.S. price the exporter set and the inputs of the manufacturer that supplied the goods to the exporter valued in a surrogate country. All companies that do not submit a response to the questionnaire or do not adequately establish that they are independent of government control are subject to the single economy-wide rate.

Subject Merchandise/Merchandise Under Consideration

Subject merchandise is the merchandise under investigation or review, i.e., the merchandise described in Appendix III to the questionnaire, and sold in, or to, the United States. (Section 771(25) of the Act.)

Surrogate Country

The Department values factors of production in a surrogate country (or countries). The surrogate usually is a market economy country that is at a level of economic development comparable to that of the nonmarket economy country and is a significant producer of the merchandise under consideration or comparable merchandise. (Section 773(c) of the Act). "Merchandise Under Consideration" refers to merchandise that meets the description of merchandise as referenced in the scope of this antidumping duty order or investigation (*see* Appendix III), regardless of whether or not destined for the U.S. market. For example, a company may have produced merchandise that was sold in the home market or to a third country market that would otherwise have been considered subject merchandise if it had been sold in, or to, the U.S. market. Such merchandise would be "Merchandise Under Consideration."

Verification

To establish the adequacy and accuracy of information submitted in response to questionnaires and other requests for information, the Department conducts an examination of the records of the party that provided the information and interviews company personnel who prepared the questionnaire response and are familiar with the sources of the data in the response. This process is called verification. The Department must verify information in an investigation, and in an administrative review when revocation of an antidumping order is properly requested. The Department also must verify information submitted in an administrative review if an interested party so requests and no verification of the producer or exporter had been conducted during the

two immediately preceding reviews of that producer or exporter, or if good cause for verification is shown. (Section 782(i) of the Act; section 351.307 of the regulations.)

APPENDIX II

INSTRUCTIONS FOR SUBMITTING COMPUTER DATA

All electronic business proprietary information that is submitted during a proceeding must be releasable in its entirety under the terms of an **administrative protective order**.

If you are not able to prepare computer files or if you have any questions concerning the submission of electronic media, contact the official in charge.

This appendix covers the following topics: computer file contents, file formats, computer media specifications, and filing instructions.

A. DESCRIPTION OF COMPUTER FILE CONTENTS

Each file submitted should be assigned a unique eight character name. We suggest that the first four positions be used to identify the respondent's name, the next two positions the type of file (*e.g.*, HM = home market sales; US = United States sales; CP = cost of production), and the last two positions a sequential file number.

For example, the first file of export sales to the United States would be named "FIRMUS01". If that data file is amended and resubmitted during the course of the proceeding, the second submission would be named "FIRMUS02", and the third submission "FIRMUS03".

Within each file, all information pertaining to a specific sales transaction or to the cost of production for a unique product should be included in one record (row). Each record should contain the fields (variables) defined in the suggested file formats included in section C (United States Sales), section D (Cost of Production and Constructed Value) and section E (U.S. Further Manufacturing) of the questionnaire.

In preparing the files, left justify character fields (columns) and right justify numeric fields. If some of the fields in the suggested file formats are not needed, exclude them from the file. Explain in the narrative portion of your response why the information in those fields is not applicable. If a particular field is not relevant for certain records in the file, enter for those records a zero in the field. Do not leave any fields blank. Fields left blank register as errors. Make sure that all reported fields contain values.

Because the suggested file formats can be modified to add or delete fields, we have not specified record length or field position in the file formats. The Department, however, does require that each file have a fixed record length and a uniform structure. Every record within a file must be

of the same length and must be formatted exactly like every other record in the file. This requires that each field within a record have a fixed width and that the fields be consistent from record to record.

All values within each field must have the same format, either all values as numeric or all values as character. In other words, do not mix character and numeric formats within the same field. Fields with mixed formats will cause errors. This is important for all data files, especially for data submitted in spreadsheet format.

When preparing the completed files for submission, sort each file first by product control number ("CONNUM"), and then, for sales files only, by date of sale ("SALEDT"). Packed decimals should be avoided. If you anticipate the need of packed decimals, approval should be obtained from the official in charge.

The Department uses PC SAS software for calculation purposes. Another suitable format is dBase. If you have questions about the software used for submission, contact the official in charge of the case.

For spreadsheet files, use the first row to enter the field names as defined in the questionnaire. Field names should be a maximum length of eight characters. There should be no hidden rows or columns in the file. Do not protect columns or rows. Date rows should be in a recognizable spreadsheet date format. Year, month and day should be separated by a slash(/) or dash(-) or a period(.) (e.g. 12/31/2000, 1999-12-31, or 1999.12.31). All date values must be formatted to display a four digit year.

B. DOCUMENTATION OF FILE FORMATS

Provide a record layout for each submitted file which identifies the file name and structure and shows the name, position, and characteristics of all fields in the file. Be sure to specify the field type (character or numeric), unit of measurement, currency, etc. Provide separate file layouts for your Section C sales database and your Section D factors of production database.

In addition to the record layout, prepare a chart for each file with the following information:

1. variable name of each field
2. short description of the variable
3. unit of measurement (where applicable)
4. unit of currency (for monetary variables)

We suggest that you integrate this information with the record layout. The record layout and chart should be included as attachments to your narrative response to the questionnaire.

C. COMPUTER MEDIA SPECIFICATIONS AND DOCUMENTATION

You may submit your files on any of the computer media listed below. Please use the electronic media specifications and format instructions described.

Please note that CDs or DVDs are acceptable media. Select a media that will hold all files pertaining to a company. If an individual file it too large to fit on one media, split the file into enough pieces that each piece will fit on a separate media. If a file is split across multiple media, please explain how the data is split.

Compressed datasets are acceptable, but must conform to these instructions. Decompression instructions and software must accompany any compressed data submission.

Since the media must be readable by an IBM-compatible PC, the data must be encoded in ASCII format or, at your option, PC SAS, Access, dBase, or Excel formats. Specify on the media label the format used.

1. CD ROM: CD-R.

2. DVD: DVD-R.

Clearly label the media with the following information:

a. Case name, case number, and submission date
b. Name of respondent
c. Proceeding and Time Period (for example, REV-POR [1/2001-12/2001] or AR#2-POR [3/2001-2/2002])
d. Name of Official in Charge
e. File formats and software used to create files
f. File names, number of observations, and record lengths

D. FILING INSTRUCTIONS

Separately pack the labeled electronic media, record layouts, file information charts, and printouts (see General Instructions, part II, instruction 11). Place a label on the package containing your name, address, and telephone number plus the case name, case number, and name of the Official in Charge. Deliver the package with your narrative response to the address listed on the cover page of this questionnaire.

APPENDIX III

DESCRIPTION OF PRODUCTS UNDER INVESTIGATION

APPENDIX IV

CERTIFICATE OF SERVICE

I, _____, hereby certify that a copy of the
(name of certifying official)

foregoing submission on behalf of _____,
(company name)

dated _____, was served by first class mail or by hand delivery (circle the method used) on the following parties:

(Business Proprietary Version)

On Behalf of

Name and address

(Public Version)

On Behalf of

Name and address

_____
(signature of certifying official)

APPENDIX IV (cont.)

COMPANY OFFICIAL CERTIFICATION

I, _____, currently employed
(name and title)

by _____, certify that (1) I have
(Interested Party)

read the attached submission, and (2) the information contained in

this submission is, to the best of my knowledge, complete and

accurate.

_____
(signature of certifying official)

APPENDIX V

RECONCILIATIONS

Sales

Please provide a reconciliation of the sales reported in your U.S. sales database to the total sales listed in your financial statements. Provide supporting documentation (e.g., general ledger, sub-ledger, etc.) for each step in the reconciliation. The reconciliation should include the following:

1. A demonstration of how the POR financial statements' sales totals tie to the general ledger sales revenue accounts.

2. A worksheet demonstrating how the general ledgers' sales revenue accounts in step one, above, tie to the sales reported in the U.S. sales database. The worksheet should identify the total quantity and value of all sales in the fiscal years overlapped by the POR and identify the quantity and value of each category of non-subject merchandise sales that are excluded from your reported sales of subject merchandise (e.g., domestic sales, sales outside the POR, sales to foreign markets other than the United States, etc.).

3. A detailed narrative explaining how all worksheets and supporting documentation tie together.

4. An explanation of the means used to identify and exclude all these non-subject merchandise sales (e.g., internal country code, product description, etc.).

5. A product list, with product codes and descriptions, of all products excluded from the reported sales of subject merchandise.

Factors of Production

Together with your factors of production response**,** provide the following worksheets that illustrate how the costs reported on the audited financial statements (or, if your company does not have audited financial statements, on the tax filing) reconcile to the general ledger or trial balance and to the cost accounting system (*i.e.*, the source used to derive the reported input quantities, *e.g.*, materials sub-ledgers, production records, and inventory records). On the worksheets, identify the source documents for all major items shown and cross-reference the worksheets where appropriate (*i.e.*, link between worksheets). If your company does not have a cost accounting system, reconcile the general ledger or trial balance to the books and records normally kept by the company which were used to derive the reported quantity of each input consumed in the production

of merchandise covered by the scope of the antidumping investigation/order.

IMPORTANT NOTE: While your factors of production response includes only input quantities, your reconciliation worksheets must include both quantity and value in order to reconcile your factors of production response to your audited financial statements.

1. Provide a worksheet reconciling the fiscal year cost of goods sold (or equivalent) on the audited financial statements to the financial accounting system (*i.e.*, general ledger or trial balance). Describe and quantify each reconciling item.

2. Provide a worksheet reconciling the total fiscal year costs from the financial accounting system (*i.e.*, general ledger or trial balance) to the total cost of manufacturing (COM) from the cost accounting system (*i.e.*, the source used to derive the reported quantity consumed of each input), and your company's inventory system and purchases records for finished products under consideration, if applicable. Describe and quantify each reconciling item.

3. Provide worksheets reconciling the total fiscal year COM from the cost accounting system to the total of the per-unit quantity consumed of each input submitted to the Department**.** For labor, energy, and the most significant material included in your Section D factors of production response, multiply the quantity

   of each input included in the buildup of the COM by the production quantity of each respective product for the POI/POR, then sum the results. If you have any questions about which factors to include on your reconciliation worksheet, contact the official in charge immediately.

   Identify and quantify the following reconciling items:

   a. differences between the reporting methodology and the normal record keeping;
   b. cost of merchandise not under consideration;
   c. cost of merchandise under consideration not sold in the United States (*i.e.*, multiply the COM of all merchandise under consideration not sold in the U.S. market for the POI /POR by their respective production quantities, then sum the totals); and,
   d. all other reconciling items.

APPENDIX VI

FACTORS OF PRODUCTION, MARKET-ECONOMY PURCHASES, BY-PRODUCT OR CO-PRODUCT OFFSETS, AND SURROGATE VALUES SPREADSHEETS

Note: The electronic version of this appendix is located in a separate excel document.

APPENDIX VII

SAMPLE CHART OF AFFILIATION STRUCTURE

Note: The electronic version of this document is located in a separate PDF document

APPENDIX VIII

CERTIFICATION REGARDING PHOTOCOPIES

This appendix must be completed by all firms for whom it is not possible to submit completely legible unaltered photocopies of all of the supporting documentation required in the application. This appendix applies both to firms that are not able to submit all the required supporting documentation, and to those who are not able to submit completely legible photocopies thereof. To complete this section, you must make the certification below and provide an explanation of why the submission of completely legible copies of all of the required supporting documentation is not possible.

I, _____ certify that I am not able to submit completely legible photocopies of the following documents _____ that are requested in the fields _____. I certify that I have made the maximum effort to obtain and submit the most complete and legible photocopies possible, and that I am submitting with the application the most legible photocopies of the documents possible. This reasons I cannot supply completely legible photocopies of all the required documents are (supply an explanation for each document that is missing or not completely legible):

I have therefore, in place of these photocopies, provided the following documents to reflect or explain what is contained in the documents that are missing or not completely legible:

_____(name)

APPENDIX IX

SIGMA FREIGHT

Note: The electronic version of this appendix is located in a separate excel document.

APPENDIX X

LETTER REGARDING THE WITHDRAWAL OF INFORMATION

Note: The electronic version of this appendix is located in a separate excel document.