

## U.S. PRODUCERS' QUESTIONNAIRE

### HEDP FROM CHINA AND INDIA

**This questionnaire must be received by the Commission by no later than December 17, 2008.**

*See page 4 of the Instruction Booklet for filing instructions.*

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping duty investigations concerning 1-Hydroxyethylidene-1,1-diphosphonic acid (HEDP) from China and India (Inv. Nos. 731-TA-1146-1147 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)).

|   |
|---|
| <b>Name of firm</b> _____   |
| <b>Address</b> _____  |
| <b>City</b> _____ <b>State</b> _____ <b>Zip Code</b> _____  |
| <b>World Wide Web address</b> _____   |
| Has your firm produced HEDP (as defined in the instruction booklet) at <u>any</u> time since January 1, 2005?   |
| <input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return only this page of the questionnaire to the Commission)   |
| <input type="checkbox"/> <b>YES</b> (Read the instruction booklet carefully, complete all parts of the questionnaire, and return the entire questionnaire to the Commission so as to be received by the date indicated above) |

### CERTIFICATION

*I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission.*

*By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout these investigations and in any other import-injury investigations conducted by the Commission on the same or similar merchandise.*

*I acknowledge that information submitted in this questionnaire response and throughout these investigations may be used by the Commission, its employees, and contract personnel who are acting in the capacity of Commission employees, for developing or maintaining the record of these investigations or related proceedings for which this information is submitted, or in internal audits and investigations relating to the programs and operations of the Commission pursuant to 5 U.S.C. Appendix 3. I understand that all contract personnel will sign non-disclosure agreements.*

|   |  |                                |
|---|--|--------------------------------|
| _____<br><i>Name of Authorized Official</i> | _____<br><i>Title of Authorized Official</i> | _____<br><i>Date</i>           |
| _____<br><i>Signature</i>                   | _____<br><i>Phone: ( )</i>                   | _____<br><i>E-mail address</i> |
|   | _____<br><i>Fax ( )</i>                      |                                |

**PART I.—GENERAL INFORMATION**

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the questionnaire. Send comments regarding the accuracy of this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Investigations, U.S. International Trade Commission, 500 E Street, SW, Washington, DC 20436.

I-1a. Please report below the actual number of hours required and the cost to your firm of preparing the reply to this questionnaire and completing the form.

\_\_\_\_\_ hours \_\_\_\_\_ dollars

I-1b. We are interested in any comments you may have for improving this questionnaire in general or the clarity of specific questions. Please attach such comments to your response or send them to the above address.

I-2. Provide the name and address of establishment(s) covered by this questionnaire (see page 3 of the instruction booklet for reporting guidelines). If your firm is publicly traded, please specify the stock exchange and trading symbol.

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I-3. **Petition support.**--Do you support or oppose the petition?

- |                                  |                                 |   |                        |
|----------------------------------|---------------------------------|---|------------------------|
| <input type="checkbox"/> Support | <input type="checkbox"/> Oppose | <input type="checkbox"/> Take no position | 731-TA-1146 – AD China |
| <input type="checkbox"/> Support | <input type="checkbox"/> Oppose | <input type="checkbox"/> Take no position | 731-TA-1147 – AD India |

Please provide any additional comments relating to your firm's position on the petition below.

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**PART I.--GENERAL INFORMATION--Continued**

I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No       Yes--List the following information

| <u>Firm name</u> | <u>Address</u> | <u>Extent of ownership</u> |
|------------------|----------------|----------------------------|
| _____            | _____          | _____                      |
| _____            | _____          | _____                      |
| _____            | _____          | _____                      |

I-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing HEDP from China or India into the United States or which are engaged in exporting HEDP from China or India to the United States?

No       Yes--List the following information

| <u>Firm name</u> | <u>Address</u> | <u>Affiliation</u> |
|------------------|----------------|--------------------|
| _____            | _____          | _____              |
| _____            | _____          | _____              |
| _____            | _____          | _____              |

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

No       Yes--List the following information

| <u>Firm name</u> | <u>Address</u> | <u>Affiliation</u> |
|------------------|----------------|--------------------|
| _____            | _____          | _____              |
| _____            | _____          | _____              |
| _____            | _____          | _____              |

**PART II.-- TRADE AND RELATED INFORMATION**

Further information on this part of the questionnaire can be obtained from Nathanael Comly, Investigator (202-205-3174, Nathanael.Comly@usitc.gov). **Supply all data requested on a calendar-year basis.**

II-1. Who should be contacted regarding the requested trade and related information?

Company contact: \_\_\_\_\_  
 Name and title

( ) \_\_\_\_\_  
 Phone number E-mail address

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of HEDP since January 1, 2005?

*(check as many as appropriate)*      *(please describe)*<sup>1</sup>

plant/warehouse openings ..... \_\_\_\_\_  
 \_\_\_\_\_

plant/warehouse closings..... \_\_\_\_\_  
 \_\_\_\_\_

relocations ..... \_\_\_\_\_  
 \_\_\_\_\_

expansions ..... \_\_\_\_\_  
 \_\_\_\_\_

acquisitions..... \_\_\_\_\_  
 \_\_\_\_\_

consolidations..... \_\_\_\_\_  
 \_\_\_\_\_

prolonged shutdowns or  
 importation curtailments..... \_\_\_\_\_  
 \_\_\_\_\_

other..... \_\_\_\_\_  
 \_\_\_\_\_

<sup>1</sup> Please supply details as to the time, nature, and significance of any such changes, and provide underlying assumptions, together with relevant portions of business plans, public corporate filings, or other internal documentation that address this issue.

**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-3. **Shared machinery/equipment.**--Does your firm produce other products on the same equipment and machinery used in the production of HEDP?

No             Yes--List the following information.

Basis for allocation of capacity data (*e.g.*, production volume): \_\_\_\_\_

Products produced on same equipment and share of total production in 2007 (in percent):

| <u>Product</u>    | <u>Percent</u> |
|-------------------|----------------|
| <u>HEDP</u> _____ | _____          |
| <u>ATMP</u> _____ | _____          |
| _____             | _____          |
| _____             | _____          |
| _____             | _____          |
| Total             | 100%           |

II-4. **Production constraints.**--Please describe the constraint(s) that set the limit(s) on your production capacity and your ability to shift production capacity between products.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-5. **Shared employment.**--Does your firm produce other products using the same production and related workers employed to produce HEDP?

No             Yes--List the following information.

Basis for allocation of employment data (*e.g.*, production volume): \_\_\_\_\_

Products produced using the same workers and share of total production in 2007 (in percent):

| <u>Product</u>    | <u>Percent</u> |
|-------------------|----------------|
| <u>HEDP</u> _____ | _____          |
| <u>ATMP</u> _____ | _____          |
| _____             | _____          |
| _____             | _____          |
| _____             | _____          |
| Total             | 100%           |

II-6. **Tolling.**--Since January 1, 2005, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of HEDP?

No             Yes--Name firm(s): \_\_\_\_\_

II-7. **FTZs.**--Does your firm produce HEDP in a foreign trade zone (FTZ)?

No             Yes--Identify FTZ(s): \_\_\_\_\_.

II-8. **Importer.**--Since January 1, 2005, has your firm imported HEDP?

No             Yes--**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-9. **Trade data.**--Report your firm's production capacity, production, shipments, inventories, and employment related to the production of HEDP in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet.)

| Quantity (in 1,000 pounds) and value (in \$1,000)  |                |      |      |                   |      |
|--|----------------|------|------|-------------------|------|
| Item   | Calendar years |      |      | January-September |      |
|  | 2005           | 2006 | 2007 | 2007              | 2008 |
| Average production capacity <sup>1</sup> (quantity)  |                |      |      |                   |      |
| Beginning-of-period inventories (quantity)   |                |      |      |                   |      |
| Production (quantity)  |                |      |      |                   |      |
| <b>U.S. shipments:</b>   |                |      |      |                   |      |
| <b>Commercial shipments:</b>   |                |      |      |                   |      |
| Quantity of commercial shipments   |                |      |      |                   |      |
| Value of commercial shipments  |                |      |      |                   |      |
| <b>Internal consumption:</b>   |                |      |      |                   |      |
| Quantity of internal consumption   |                |      |      |                   |      |
| Value <sup>2</sup> of internal consumption   |                |      |      |                   |      |
| <b>Transfers to related firms:</b>   |                |      |      |                   |      |
| Quantity of transfers  |                |      |      |                   |      |
| Value <sup>2</sup> of transfers  |                |      |      |                   |      |
| <b>Export shipments:</b> <sup>3</sup>  |                |      |      |                   |      |
| Quantity of export shipments   |                |      |      |                   |      |
| Value of export shipments  |                |      |      |                   |      |
| End-of-period inventories <sup>4</sup> (quantity)  |                |      |      |                   |      |
| <b>Channels of distribution:</b>   |                |      |      |                   |      |
| U.S. shipments to distributors (quantity)  |                |      |      |                   |      |
| U.S. shipments to compounders (quantity)   |                |      |      |                   |      |
| U.S. shipments to end users (quantity)   |                |      |      |                   |      |
| <b>Employment data:</b>  |                |      |      |                   |      |
| Average number of PRWs (number)  |                |      |      |                   |      |
| Hours worked by PRWs (1,000 hours)   |                |      |      |                   |      |
| Wages paid to PRWs (value)   |                |      |      |                   |      |
| <sup>1</sup> The production capacity (see definitions in instruction booklet) reported is based on operating ____ hours per week, ____ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity (use additional pages as necessary).<br><hr/>   |                |      |      |                   |      |
| <sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. In the event that you use a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for 2005, 2006, 2007, January-September 2007, and January-September 2008 below:<br><hr/> |                |      |      |                   |      |
| <sup>3</sup> Identify your principal export markets: _____<br>   |                |      |      |                   |      |
| <sup>4</sup> Reconciliation of data.--Please note that the <b>quantities</b> reported above should reconcile as follows: beginning-of-period inventories, plus production, less total shipments, equals end-of-period inventories. Do the data reported reconcile?<br><input type="checkbox"/> Yes <input type="checkbox"/> No--Please explain: _____                      |                |      |      |                   |      |

**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-10a. **Geographic markets.**--Based on the quantity of your firm's U.S. shipments in 2007 as reported in response to question II-9 above, please report the shares of your U.S. shipments of domestically produced HEDP shipped to the geographic markets listed below.

| <b>Share of U.S. shipments in 2007<br/>(in percent)</b> | <b><u>Geographic area</u></b>   |
|---|---|
| _____   | <b>Northeast.</b> --CT, ME, MA, NH, NJ, NY, PA, RI, and VT.   |
| _____   | <b>Midwest.</b> --IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.   |
| _____   | <b>Southeast.</b> --AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.   |
| _____   | <b>Central Southwest.</b> --AR, LA, OK, and TX.   |
| _____   | <b>Mountains.</b> --AZ, CO, ID, MT, NV, NM, UT, and WY.   |
| _____   | <b>Pacific Coast.</b> --CA, OR, and WA.   |
| _____   | <b>Other.</b> --All other markets in the United States not previously listed, including AK, HI, PR, VI, among others. |

**Total = 100%**

Note.--These shares should be calculated from all reported U.S. shipments in 2007 from question II-9.

II-10b. **Geographical export shipments.**--Based on the quantity of your firm's export shipments in 2007 as reported in response to question II-9 above, please report the shares of domestically produced HEDP shipped to the geographic markets listed below.

| <b>Share of export shipments in 2007<br/>(in percent)</b> | <b><u>Geographic area</u></b>                                  |
|---|--|
| _____   | <b>NAFTA export markets</b> ( <i>i.e.</i> , Canada and Mexico) |
| _____   | <b>All other export markets</b>                                |

**Total = 100%**

Note.--These shares should be calculated from export shipments in 2007 from question II-9.

II-10c. **Geographic limitations.**--Referring to the geographic areas identified in II-10a and II-10b above, please indicate whether there have been any geographic areas in which your firm has attempted to sell its HEDP and could not or whether there are certain geographic areas in which your firm has attempted to expand its presence but could not, and describe the circumstances.

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**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-11. **Internal transfer/consumption use.**--As reported in question II-9, has your firm internally transferred/consumed any portion of its production of HEDP in order to produce downstream product(s) (*i.e.*, product(s) produced at least in part from internal transfers of HEDP), such as tetrasodium etidronate?

No--Skip to question II-20.       Yes--Complete questions II-12 through II-19.

II-12. **Downstream products.**--Please identify the specific downstream product(s) that your firm produces from internal transfers of HEDP, the percent that product accounts for out of internal consumption in 2007, and the share of the raw material cost of producing your downstream product(s) that was accounted for by HEDP.

| <u>Product</u>           | <u>Share of internal<br/>consumption in<br/>2007<br/>(in percent)</u> | <u>HEDP's share of<br/>downstream<br/>production cost<br/>(in percent)</u> |
|--------------------------|---|--|
| ● Tetrasodium etidronate | _____   | _____  |
| ● Other: _____           | _____   | _____  |
| ● Other: _____           | _____   | _____  |
| ● Other: _____           | _____   | _____  |
| ● Other: _____           | _____   | _____  |
| Total                    | 100 percent   | This column<br>should <b><i>not</i></b> total to<br>100 percent.           |

Note.--the reported share of internal consumption in 2007 should be calculated from the data reported in question II-9.

II-13. **Downstream production.**--Was all of the HEDP that your firm transferred for internal processing actually processed into a downstream product?

Yes       No--Please report the quantity and value sold in the HEDP merchant market in 2007.

Quantity (*1,000 pounds*): \_\_\_\_\_      Value (*\$1,000 dollars*): \_\_\_\_\_

Please also report any quantity and value of internally consumed HEDP in 2007 that was unusable and/or was used for some purpose other than the processing of a downstream product. Please also specify the purpose.

Quantity (*1,000 pounds*): \_\_\_\_\_      Value (*\$1,000 dollars*): \_\_\_\_\_

Purpose: \_\_\_\_\_  
\_\_\_\_\_

**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-14. **Merchant market sales uses.**--In 2007, was the HEDP that you sold in the merchant market (primarily U.S. commercial shipments reported in question II-9) generally used in the production of downstream products by your customers?

- No     Don't know     Yes -- Please identify your two major customers, the major downstream products involved, and the approximate share (*in percent*) of the volume of your merchant market sales of HEDP in 2007, by volume, that was used in the production of downstream products by all of your customers.

| <u>Item</u>   | <u>Share of volume of<br/>merchant market<br/>sales in 2007<br/>(in percent)</u> |
|---|--|
| <b>Two largest customers that produce downstream products using HEDP--</b>  |  |
| Customer 1: _____   | _____  |
| Customer 2: _____   | _____  |
| <b>Share of overall merchant market sales--</b>   |  |
| ● Known to be used in the production of downstream products (customer 1 and customer 2 reported above should be a subset of this category) (A). | _____  |
| • <i>of which</i> , Tetrasodium etidronate (B)  | _____  |
| • <i>of which</i> , Other: _____ (C)  | _____  |
| • <i>of which</i> , Other: _____ (D)  | _____  |
| • <i>of which</i> , Other: _____ (E)  | _____  |
| • <i>of which</i> , Other: _____ (F)  | _____  |
| • <i>of which</i> , All other products (G)  | _____  |
| ● Known to be consumed as is without further processing (H)   | _____  |
| ● Use unknown (I)   | _____  |

Note.--Lines A, H, and I should sum to equal 100 percent. Lines B, C, D, E, F, and G should sum to equal line A. The shares reported for customers 1 and 2 are subsets of line A.

**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-15. **Transfers.**--In 2007, did your firm transfer any HEDP to related firms (refer to question II-9)?

- No--Skip to question II-20       Yes -- Please provide the following information and answer the remaining questions in part II.

| <u>Related company</u> | <u>Your ownership interest (in percent)</u> | <u>Other firms with an ownership interest in the company</u> | <u>Their ownership interest (in percent)</u> |
|------------------------|---|--|--|
| _____                  | _____                                       | _____  | _____  |
| _____                  | _____                                       | _____  | _____  |
| _____                  | _____                                       | _____  | _____  |
| _____                  | _____                                       | _____  | _____  |

II-16. **Related firms' sources.**--In 2007, did the related company(ies) identified above source HEDP from any companies other than your firm?

- No       Yes -- Please list the other sources from which each related company obtained HEDP and what percentage came from each source. Please also indicate whether or not the HEDP from each other source was provided under a toll agreement.

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II-17. **Related firms' tolling.**--Are your firm's transfers to the related company(ies) identified above made through a toll operation (*i.e.*, do you maintain legal title to the HEDP that you transfer)?

- Yes       No -- Please indicate whether the price your company sells HEDP to the related company(ies) is established:

- Based on market prices for HEDP, or
- Based on a non-market formula. (If price is based on a non-market formula, please explain the formula for valuing the HEDP, including what factors such as costs, profit, *etc.*, are used to arrive at the price charged for the HEDP transferred).

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**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-18. **Related firms' rights.**--What entity holds the marketing/distribution rights (*i.e.*, sells) the product(s) produced by the related company(ies)?

- Your firm (including any joint ventures)       Related company(ies)

If the joint venture partners and other owners sell the products produced by the related company(ies), how is the production of the related company divided among the joint venture partners and other owners?

- By ownership share       Otherwise--please specify.

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II-19. **Related firms' transfers value.**--Are transfers to the related companies(ies) valued differently from other internal transfers?

- No       Yes--Please explain the basis for the difference in valuation.

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**PART II.—TRADE AND RELATED INFORMATION--Continued**

II-20. **Purchases.**--Other than direct imports, has your firm otherwise purchased HEDP since January 1, 2005? (See definitions in the instruction booklet.)

No                       Yes--Report such purchases below for the specified periods.<sup>1</sup>

| Quantity (in 1,000 pounds) and value (in \$1,000)   |                |      |      |                   |      |
|---|----------------|------|------|-------------------|------|
| Item  | Calendar years |      |      | January-September |      |
|   | 2005           | 2006 | 2007 | 2007              | 2008 |
| <b>PURCHASES FROM U.S. IMPORTERS<sup>2</sup> OF HEDP FROM--</b>   |                |      |      |                   |      |
| China:  |                |      |      |                   |      |
| Quantity  |                |      |      |                   |      |
| Value   |                |      |      |                   |      |
| India:  |                |      |      |                   |      |
| Quantity  |                |      |      |                   |      |
| Value   |                |      |      |                   |      |
| United Kingdom:   |                |      |      |                   |      |
| Quantity  |                |      |      |                   |      |
| Value   |                |      |      |                   |      |
| All other countries:  |                |      |      |                   |      |
| Quantity  |                |      |      |                   |      |
| Value   |                |      |      |                   |      |
| <b>PURCHASES FROM OTHER DOMESTIC PRODUCERS:<sup>2</sup></b>   |                |      |      |                   |      |
| Quantity  |                |      |      |                   |      |
| Value   |                |      |      |                   |      |
| <b>PURCHASES FROM OTHER SOURCES:<sup>2</sup></b>  |                |      |      |                   |      |
| Quantity  |                |      |      |                   |      |
| Value   |                |      |      |                   |      |
| <sup>1</sup> Please indicate your reasons for purchasing this product. If your reasons differ by source, please elaborate.<br><hr/> <hr/>   |                |      |      |                   |      |
| <sup>2</sup> Please list the name of the firm(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier.<br><hr/> <hr/> |                |      |      |                   |      |

**PART III.—FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to David Boyland, Auditor (202-708-4725, David.Boyland@usitc.gov ).

III-1. Who should be contacted regarding the requested financial information?

Company contact: \_\_\_\_\_  
 Name and title

( ) \_\_\_\_\_  
 Phone number E-mail address

III-2. **Accounting system.**--Briefly describe your financial accounting system.

- A. When does your fiscal year end (month and day)? \_\_\_\_\_  
 If your fiscal year changed during the period examined, explain below:  
 \_\_\_\_\_
- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include subject merchandise:  
 \_\_\_\_\_
- 2. Does your firm prepare profit/loss statements for the subject merchandise:  
 Yes  No
- 3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.  
 Audited,  unaudited,  annual reports,  10Ks,  10Qs,  
 Monthly,  quarterly,  semi-annually,  annually
- 4. Accounting basis:  GAAP,  cash,  tax, or  other comprehensive (specify) \_\_\_\_\_

*Note: The Commission may request that your company submit copies of its financial statements, including internal profit-and-loss statements for the division or product group that includes HEDP, as well as those statements and worksheets used to compile data for your firm's questionnaire response.*

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

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**PART III.—FINANCIAL INFORMATION--Continued**

III-4. **Allocation basis.**--Briefly describe your allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

III-5. **Product mix.**--Please list the products you produced in the facilities in which you produced HEDP, and provide the share of net sales accounted for by these other products in your most recent fiscal year:

| <u>Products</u> | <u>Share of sales</u> |
|-----------------|-----------------------|
| HEDP            | _____                 |
| ATMP            | _____                 |
| Other: _____    | _____                 |
| Other: _____    | _____                 |
| Other: _____    | _____                 |

III-6. **Inputs from related firm.**--Does your company receive inputs (raw materials, labor, energy or any other services) used in the production of HEDP from any related company?

Yes--Continue to question III-7 below.       No--Continue to question III-10 below.

III-7. **Inputs.**--In the space provided below, identify the inputs related to the production of HEDP that your firm receives from related parties whose financial statements are consolidated with the financial statements of your firm.

| <u>Input</u> | <u>Related Party</u> |
|--------------|----------------------|
| _____        | _____                |
| _____        | _____                |
| _____        | _____                |
| _____        | _____                |

**PART III.—FINANCIAL INFORMATION--Continued**

III-8. **Consolidated financials.**--With respect to the related companies identified in response to question III-7 above, are their financial statements consolidated with your firm's financial statements? (In other words, are profits or losses arising from intercompany transactions eliminated?)

Yes--Continue to question III-9 below.       No--Continue to question III-10 below.

III-9. **Inputs from related firms at cost.**--All intercompany profit on inputs purchased from related parties that is eliminated pursuant to formal financial statement consolidation should also be eliminated from the costs reported to the Commission in questions III-11 (Operations on HEDP); *i.e.*, costs reported in questions III-11, to the extent that they reflect inputs purchased from related parties, should only reflect the related party's cost and not include an associated profit component. Reasonable methods for determining and eliminating the associated profit on inputs purchased from related parties are acceptable.

Has your firm complied with the Commission's instructions regarding costs associated with inputs purchased from related parties?

Yes       No

III-10. **Raw materials.**--Please identify any changes in the raw materials used by your firm to produce HEDP and discuss the effect of such changes on your firm's operating performance (*e.g.*, costs, credits/offsets, production efficiency, etc.).

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III-11. **Nonrecurring charges.**--For each annual period for which financial results are reported in question III-12, please provide in the space below details of the period-specific amount of non-recurring charges, the expense/cost line items where the associated charges are included, and a brief description of the charge(s). Non-recurring charges would include, but are not limited to, items such as asset write-offs and accelerated depreciation due to restructuring of the company's HEDP operations.

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**PART III.—FINANCIAL INFORMATION--Continued**

III-12. **Operations on HEDP.**--Report the revenue and related cost information requested below on the HEDP operations of your U.S. establishment(s).<sup>1</sup> **Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value and purchases from related firms must be at cost.**<sup>2</sup> Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee) please contact **David Boyland** at 202-708-4725 before completing this section of the questionnaire.

| Quantity (in 1,000 pounds) and value (in \$1,000)   |                      |       |       |                   |      |
|---|----------------------|-------|-------|-------------------|------|
| Item  | Fiscal years ended-- |       |       | January-September |      |
|   | _____                | _____ | _____ | 2007              | 2008 |
| <b>Net sales quantities:</b> <sup>3</sup>   |                      |       |       |                   |      |
| Commercial sales  |                      |       |       |                   |      |
| Internal consumption  |                      |       |       |                   |      |
| Transfers to related firms  |                      |       |       |                   |      |
| Total net sales quantities  |                      |       |       |                   |      |
| <b>Net sales values:</b> <sup>3</sup>   |                      |       |       |                   |      |
| Commercial sales  |                      |       |       |                   |      |
| Internal consumption  |                      |       |       |                   |      |
| Transfers to related firms  |                      |       |       |                   |      |
| Total net sales values  |                      |       |       |                   |      |
| <b>Cost of goods sold (COGS):</b> <sup>4</sup>  |                      |       |       |                   |      |
| Raw materials <sup>5</sup>  |                      |       |       |                   |      |
| Direct labor  |                      |       |       |                   |      |
| Other factory costs   |                      |       |       |                   |      |
| Less: revenue from by-products of HEDP <sup>6</sup>   |                      |       |       |                   |      |
| Total COGS  |                      |       |       |                   |      |
| <b>Gross profit or (loss)</b>   |                      |       |       |                   |      |
| <b>Selling, general, and administrative (SG&amp;A) expenses:</b>  |                      |       |       |                   |      |
| Selling expenses  |                      |       |       |                   |      |
| General and administrative expenses   |                      |       |       |                   |      |
| Total SG&A expenses   |                      |       |       |                   |      |
| <b>Operating income (loss)</b>  |                      |       |       |                   |      |
| <b>Other income and expenses:</b>   |                      |       |       |                   |      |
| Interest expense  |                      |       |       |                   |      |
| All other expense items   |                      |       |       |                   |      |
| All other income items  |                      |       |       |                   |      |
| All other income or expenses, net   |                      |       |       |                   |      |
| <b>Net income or (loss) before income taxes</b>   |                      |       |       |                   |      |
| <b>Depreciation/amortization included above</b>   |                      |       |       |                   |      |
| <sup>1</sup> Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.<br><sup>2</sup> Please list the expense categories and amounts of any profits on internal inputs or inputs from related firms that are reflected on your books but which are eliminated from the costs reported.<br><sup>3</sup> Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.<br><sup>4</sup> COGS should include costs associated with internal consumption and transfers to related firms.<br><sup>5</sup> Please list the raw materials used: _____<br><sup>6</sup> Please list the by-products: _____ |                      |       |       |                   |      |

**PART III.—FINANCIAL INFORMATION--Continued**

III-13. **Asset values.**--Report the total assets associated with the production, warehousing, and sale of HEDP. If your firm does not maintain some or all of the specific asset data in the normal course of business, please estimate it based upon some rational method (such as production, sales, or costs) that is consistent with your cost allocations in the previous question. Your finished goods inventory value should reconcile with the inventory quantity data reported in Part II. Provide data as of the end of your three most recently completed fiscal years in chronological order from left to right.

| Item   | Fiscal years ended-- |       |       |
|--|----------------------|-------|-------|
|  | _____                | _____ | _____ |
| <b>Assets associated with the production, warehousing, and sale of HEDP:</b> |                      |       |       |
| 1. Current assets:   |                      |       |       |
| A. Cash and equivalents  |                      |       |       |
| B. Accounts receivable, net  |                      |       |       |
| C. Inventories (finished goods)  |                      |       |       |
| D. Inventories (raw materials and work in process)                           |                      |       |       |
| E. Short term investments  |                      |       |       |
| F. Prepaid expenses  |                      |       |       |
| G. Property held for resale  |                      |       |       |
| H. Other (describe: _____ )  |                      |       |       |
| I. Total current assets (lines 1.A. through 1.H.)                            |                      |       |       |
| <b>2. Notes receivable</b>   |                      |       |       |
| <b>3. Long-term investments</b>  |                      |       |       |
| <b>4. Property, plant, and equipment:</b>                                    |                      |       |       |
| A. Original cost of property, plant, and equipment                           |                      |       |       |
| B. Less: Accumulated depreciation  |                      |       |       |
| C. Equals: Book value of property, plant, and equipment                      |                      |       |       |
| <b>5. Goodwill</b>   |                      |       |       |
| <b>6. Other</b> (describe: _____ )   |                      |       |       |
| <b>7. Other</b> (describe: _____ )   |                      |       |       |
| <b>8. Total assets</b> (lines 1.I, 2, 3, 4.C., 5, 6, and 7)                  |                      |       |       |

**PART III.—FINANCIAL INFORMATION--Continued**

III-14. **Capital expenditures and research and development expenditures.**--Report your firm's capital expenditures and research and development expenditures on HEDP. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods.

| Item                                  | Value (in \$1,000)   |       |       |                   |      |
|---------------------------------------|----------------------|-------|-------|-------------------|------|
|                                       | Fiscal years ended-- |       |       | January-September |      |
|                                       | _____                | _____ | _____ | 2007              | 2008 |
| Capital expenditures                  |                      |       |       |                   |      |
| Research and development expenditures |                      |       |       |                   |      |

Please describe the major capital expenditures and research and development expenditures in the data provided above. If the expenditures relate to specific fiscal years or interim periods, please so state.

Capital expenditures: \_\_\_\_\_

Research and development expenditures: \_\_\_\_\_

III-15. **Effects of imports.**--Since January 1, 2005, has your firm experienced any actual negative effects on its return on investment or its growth, investment, ability to raise capital, existing development and production efforts (including efforts to develop a derivative or more advanced version of the product), or the scale of capital investments as a result of imports of HEDP from China and/or India?

- No       Yes--My firm has experienced actual negative effects as follows:
- Cancellation, postponement, or rejection of expansion projects
  - Denial or rejection of investment proposal
  - Reduction in the size of capital investments
  - Rejection of bank loans
  - Lowering of credit rating
  - Problem related to the issue of stocks or bonds
  - Other (specify) \_\_\_\_\_

III-16. **Anticipated impact of imports.**--Does your firm anticipate any negative impact of imports of HEDP from China or India?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**PART IV.--PRICING AND RELATED INFORMATION**

Further information on this part of the questionnaire can be obtained from James Fetzer, economist (202-708-5403, James.Fetzer@usitc.gov).

IV-1. Who should be contacted regarding the requested pricing and related information?

Company contact:

\_\_\_\_\_

( )

\_\_\_\_\_

\_\_\_\_\_

**PRICE DATA**

This section requests quarterly quantity and value data on your firm's commercial U.S. shipments to unrelated U.S. customers during January 2005-September 2008 of the following products produced by your firm.

**Product 1.**-- 60 percent nominal aqueous solution HEDP, including, but not limited to, Dequest® 2010 (Thermphos/Solutia), Briquest® ADPA-60A (Rhodia), Mayoquest® 1500 (Compass), Aquacid 105 EX (Aquapharm), XF-334 (Wujin Fine Chemical Factory), KW-100 (Kewei), and ZF111SG (Wujin Water Stabilizer Factory), sold in truckload (or full container load) of drums (or totes) to distributors (resellers).

**Product 2.**-- 60 percent nominal aqueous solution HEDP, including, but not limited to, Dequest® 2010 (Thermphos/Solutia), Briquest® ADPA-60A (Rhodia), Mayoquest® 1500 (Compass), Aquacid 105 EX (Aquapharm), XF-334 (Wujin Fine Chemical Factory), KW-100 (Kewei), and ZF111SG (Wujin Water Stabilizer Factory), sold in bulk tanktruck (or isocontainer) to compounders (a.k.a. formulators).

**Product 3.**-- 60 percent nominal aqueous solution HEDP, including, but not limited to, Dequest® 2010 (Thermphos/Solutia), Briquest® ADPA-60A (Rhodia), Mayoquest® 1500 (Compass), Aquacid 105 EX (Aquapharm), XF-334 (Wujin Fine Chemical Factory), KW-100 (Kewei), and ZF111SG (Wujin Water Stabilizer Factory), sold in truckload (or full container load) of drums (or totes) to compounders (a.k.a. formulators).

**Product 4.**-- 60 percent nominal aqueous solution HEDP, including, but not limited to, Dequest® 2010 (Thermphos/Solutia), Briquest® ADPA-60A (Rhodia), Mayoquest® 1500 (Compass), Aquacid 105 EX (Aquapharm), XF-334 (Wujin Fine Chemical Factory), KW-100 (Kewei), and ZF111SG (Wujin Water Stabilizer Factory), sold in LTL drums (or totes) to compounders (a.k.a. formulators).

**Please note that total dollar values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Total dollar values should reflect the *final net* amount paid to you (i.e., should be net of all deductions for discounts or rebates). See instruction booklet.**

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-2. Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm.

| <b>(Quantity in pounds, value in dollars)</b> |                  |              |                  |              |
|---|------------------|--------------|------------------|--------------|
| <b>Period of shipment</b>                     | <b>Product 1</b> |              | <b>Product 2</b> |              |
|   | <b>Quantity</b>  | <b>Value</b> | <b>Quantity</b>  | <b>Value</b> |
| <b>2005</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |
| October-December                              |                  |              |                  |              |
| <b>2006</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |
| October-December                              |                  |              |                  |              |
| <b>2007</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |
| October-December                              |                  |              |                  |              |
| <b>2008</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |
| <b>Period of shipment</b>                     | <b>Product 3</b> |              | <b>Product 4</b> |              |
|   | <b>Quantity</b>  | <b>Value</b> | <b>Quantity</b>  | <b>Value</b> |
| <b>2005</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |
| October-December                              |                  |              |                  |              |
| <b>2006</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |
| October-December                              |                  |              |                  |              |
| <b>2007</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |
| October-December                              |                  |              |                  |              |
| <b>2008</b>                                   |                  |              |                  |              |
| January-March                                 |                  |              |                  |              |
| April-June                                    |                  |              |                  |              |
| July-September                                |                  |              |                  |              |

<sup>1</sup> Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point of shipment.

<sup>2</sup> Pricing product definitions are provided on the first page of Part IV.

Note.--If your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:

Product 1: \_\_\_\_\_

Product 2: \_\_\_\_\_

Product 3: \_\_\_\_\_

Product 4: \_\_\_\_\_

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

**If your answers differ according to country, please indicate so in your response.**

IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of HEDP (*check all that apply*)? If your firm issues price lists, please include a copy of a recent price list with your submission. If your price list is large, please submit sample pages.

- Transaction by transaction                       Contracts                       Set price lists
- Other--Please describe: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

IV-4. **Reverse auctions.**--Does your firm sell, or attempt to sell, its domestically produced HEDP in reverse auctions?

- No                       Yes--\_\_\_\_\_ percent of sales in 2007. Please describe how prices are determined in reverse auctions.
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

IV-5. **Discount policy.**--Please describe your firm's discount policy (*check all that apply*).

- Quantity discounts                       Annual total volume discounts                       No discount policy
- Other--Please describe: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

IV-6. **Pricing terms for HEDP.**--

- (a) What are your firm's typical sales terms for its U.S.-produced HEDP (*e.g.*, 2/10 net 30 days)? \_\_\_\_\_.
- (b) On what basis are your prices of U.S.-produced HEDP usually quoted? (check one)
- F.o.b.--Please specify point: \_\_\_\_\_                       Delivered

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-7. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced HEDP in 2007 were on a (1) long-term contract basis (multiple deliveries for more than 12 months), (2) short-term contract basis (multiple deliveries up to 12 months), and (3) spot sales basis (for a single delivery)?

| <b>Type of sale</b>  | <b>Share of sales (percent)</b> |
|----------------------|---------------------------------|
| Long term contracts  |                                 |
| Short term contracts |                                 |
| Spot sales           |                                 |
| Total                | 100 %                           |

IV-8. **Long-term contract provisions.**--If you sell on a long-term contract basis, please answer the following questions with respect to provisions of a typical long-term contract.

- (a) What is the average duration of a contract? \_\_\_\_\_
- (b) Can prices be renegotiated during the contract period?     Yes     No
- (c) Does the contract fix quantity, price, or both?     Quantity     Price     Both
- (d) Does the contract have a meet or release provision?     Yes     No

IV-9. **Short-term contract provisions.**--If you sell on a short-term contract basis, please answer the following questions with respect to provisions of a typical short-term contract.

- (a) What is the average duration of a contract? \_\_\_\_\_
- (b) Can prices be renegotiated during the contract period?     Yes     No
- (c) Does the contract fix quantity, price, or both?     Quantity     Price     Both
- (d) Does the contract have a meet or release provision?     Yes     Not

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-10. **Lead times.**--What is the average lead time between a customer's order and the date of delivery for your firm's sales of your firm's U.S.-produced HEDP?

| Source            | Share of sales 2007 | Lead time  |
|-------------------|---------------------|------------|
| From inventory    | _____ percent       | _____ days |
| Produced to order | _____ percent       | _____ days |
| Total             | 100 percent         | _____ days |

IV-11. **Shipping information.**—

- (a) What is the approximate percentage of the total delivered cost of HEDP that is accounted for by U.S. inland transportation costs?  
\_\_\_\_\_ percent.
- (b) Who generally arranges the transportation to your customers' locations? (check one)  
 Your firm    Purchaser
- (c) What proportion of your sales occur within:  
100 miles of your storage or production facility? \_\_\_\_\_ percent. Within 101 to 1,000 miles? \_\_\_\_\_ percent. Over 1,000 miles? \_\_\_\_\_ percent.

IV-12. **End uses.**--Describe the end uses of the HEDP that you manufacture. For each end-use product, what percentage of the total cost is accounted for by HEDP?

| <u>End use</u> | <u>HEDP share of total cost (percent)</u> |
|----------------|---|
| _____          | _____                                     |
| _____          | _____                                     |
| _____          | _____                                     |
| _____          | _____                                     |

**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-13. **Substitutes.**--Please list in order of importance any products that may be substituted for HEDP. For each possible substitute product, please give examples of applications and end uses for which they are substitutes and indicate whether changes in the price of the substitute affect the price for HEDP, and to what degree, the length of any time lag of such an effect.

| Substitute(s) for HEDP: | Description / end use | Have changes in the prices of this substitute affected the price for HEDP?               |
|-------------------------|-----------------------|--|
| 1.                      |                       | <input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain.<br><hr/> <hr/> |
| 2.                      |                       | <input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain.<br><hr/> <hr/> |
| 3.                      |                       | <input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain.<br><hr/> <hr/> |

IV-14. **Demand trends.**—

How has demand for HEDP within the United States (and outside the United States if known) changed since January 1, 2005? What principal factors affected any changes in demand?

Within the United States

Increased       No Change       Decreased       Fluctuated

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Outside the United States

Increased       No Change       Decreased       Fluctuated

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**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-15. **Marketing changes.**--Have there been any significant changes in the product range or marketing of HEDP since January 1, 2005?

- No             Yes--Please describe.

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IV-16. **Internet sales.**--Does your firm sell HEDP over the internet?

- No             Yes-- Please describe, noting the estimated percentage of your firm's total sales of HEDP in 2007 accounted for by internet sales.

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**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-19. **Major customers.**--Please identify below the names and addresses of your firm's 10 largest customers for HEDP since 2005. Please also provide the name and telephone number of a contact person and the share of the quantity of your firm's total shipments of HEDP for which each of these customers accounted in 2007.

| No. | Customer's name | Street address (not P.O. box), city, state, and zip code | Contact person | Area code and telephone number | Share of 2007 sales (%) |
|-----|-----------------|--|----------------|--------------------------------|-------------------------|
| 1   |                 |  |                |                                |                         |
| 2   |                 |  |                |                                |                         |
| 3   |                 |  |                |                                |                         |
| 4   |                 |  |                |                                |                         |
| 5   |                 |  |                |                                |                         |
| 6   |                 |  |                |                                |                         |
| 7   |                 |  |                |                                |                         |
| 8   |                 |  |                |                                |                         |
| 9   |                 |  |                |                                |                         |
| 10  |                 |  |                |                                |                         |



**PART IV.--PRICING AND RELATED INFORMATION--Continued**

IV-21. **COMPETITION FROM IMPORTS--LOST SALES.** --THIS SECTION IS TO BE COMPLETED ONLY BY NON-PETITIONERS. (Note: petitioners may provide allegations involving quotes made AFTER the filing of the petition.)

Since January 1, 2005: Did your firm lose sales of HEDP to imports of this product from China and/or India?

No                       Yes

If yes, please furnish as much of the following information as possible for each affected transaction. Document such allegations of lost sales whenever possible (documentation could include copies of invoices, sales reports, or letters from customers). Please note that the Commission may contact the firms named to verify the allegations reported.

- Customer name, contact person, phone and fax numbers
- Specific product(s) involved (specific type of HEDP)
- Date of your price quotation
- Quantity involved
- Your rejected price quotation (total delivered value)
- The country of origin of the competing imported product
- The accepted price quotation of the imported product (total delivered value)

| Customer name,<br>contact person,<br>phone and fax<br>numbers | Product | Date of<br>quote | Quantity<br>(pounds) | Rejected<br>U.S. price<br>(total value--<br>dollars) | Country of<br>origin | Competing<br>import price<br>(total value--<br>dollars) |
|---|---------|------------------|----------------------|--|----------------------|---|
|   |         |                  |                      |  |                      |   |
|   |         |                  |                      |  |                      |   |
|   |         |                  |                      |  |                      |   |
|   |         |                  |                      |  |                      |   |