

PRODUCERS' QUESTIONNAIRE
UREA AMMONIUM NITRATE SOLUTIONS FROM BELARUS,
RUSSIA, AND UKRAINE

Return completed questionnaire to:

UNITED STATES INTERNATIONAL TRADE COMMISSION
Office of Investigations, Room 615
500 E Street, SW, Washington, DC 20436

So as to be received by the Commission by no later than November 8, 2002

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping investigations concerning urea ammonium nitrate solutions ("UAN") from Belarus, Russia, and Ukraine (invs. Nos. 731-TA-1006, 1008, and 1009 (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)).

Name of firm _____
Address _____
City _____ State _____ Zip code _____
World Wide Web address _____
Has your firm produced UAN (as defined in the instruction booklet) at any time since January 1, 1999?
<input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> YES (Read the instruction booklet carefully, complete all parts of the questionnaire, sign the certification, and return the entire questionnaire to the Commission)

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 I understand that the information submitted is subject to audit and verification by the Commission.

By signing this certification I also consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout these investigations in any other import-injury investigations conducted by the Commission on the same or similar merchandise. (If you do not consent to such use, please note the certification accordingly).

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 records 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.

Name and Title of Authorized Official

Date

Signature of Authorized Official

() _____
Phone

() _____
Fax

PART I.--GENERAL QUESTIONS

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 40 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-1. 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-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.

I-3. Do you support or oppose the petition? Please explain.

Support Oppose Take no position

As indicated at the top of the page, your response to this question will be treated as business proprietary. However, if the Commission's final determination in the investigation is affirmative and an antidumping duty order is issued, the Commission, pursuant to section 754 of the Tariff Act of 1930, will provide a list of firms supporting the petition to the Customs Service for possible distribution of any antidumping duties that may be collected. If you wish to waive business proprietary treatment of your response to this question in order to make your position with respect to the petition public and allow inclusion of your firm on that list, indicate "yes" below.

Yes No (that is, I do not wish my position on the petition to be made public)

I-4. 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>
_____	_____	_____
_____	_____	_____

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

II-3. Has your firm experienced any major production cutbacks or idling of capacity for UAN since January 1, 1999?

- No Yes--Please list the date(s) of the production cutbacks or idling of capacity (including shutdown), the approximate amount of UAN production cut back or lost due to idling (*in short tons, 32% nitrogen content basis*) in each instance, and the specific reason(s) for each cutback or idling (e.g., increased natural gas prices, strikes, natural disasters such as hurricanes, etc.). **It is especially important that you identify the extent to which each production cutback or idling was (or was not) due to increased natural gas prices and the time lag between the change in natural gas price and the change in production.**

II-4. Does your firm produce other products on the same equipment and machinery used in the production of UAN?

- No Yes--List the following information.

<u>Product</u>	<u>Basis for allocation of capacity data</u>
<hr/>	<hr/>
<hr/>	<hr/>

II-5. Please describe the constraint(s) that set the limit(s) on your production capabilities.

II-6. Does your firm produce other products using the same production and related workers employed to produce UAN?

- No Yes--List the following information.

<u>Product</u>	<u>Basis for allocation of employment data</u>
<hr/>	<hr/>
<hr/>	<hr/>

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

II-7. Since January 1, 1999, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of UAN?

No Yes--Name firm: _____

II-8. Does your firm produce UAN in a foreign trade zone (FTZ)?

No Yes--Identify FTZ(s): _____

II-9. Since January 1, 1999, has your firm imported UAN?

No Yes--**COMPLETE AND RETURN THE ENCLOSED IMPORTERS' QUESTIONNAIRE**

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

II-10. Report your firm's production capacity, production, shipments, inventories, and employment related to the production of UAN in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet.) **Quantities reported should be on a 32-percent nitrogen content basis.**

(Quantity in short tons, 32-percent nitrogen-content basis; value in \$1,000)					
Item	Calendar years			January-September	
	1999	2000	2001	2001	2002
AVERAGE PRODUCTION CAPACITY (<i>quantity</i>)					
BEGINNING-OF-PERIOD INVENTORIES (<i>quantity</i>)					
PRODUCTION (<i>quantity</i>)					
U.S. SHIPMENTS:					
Commercial shipments:					
<i>Quantity</i> of commercial shipments					
<i>Value</i> of commercial shipments					
Internal consumption:					
<i>Quantity</i> of internal consumption					
<i>Value</i> ¹ of internal consumption					
Transfers to related firms:					
<i>Quantity</i> of transfers to related firms					
<i>Value</i> ¹ of transfers to related firms					
Toll shipments:					
<i>Quantity</i> of toll shipments					
<i>Value</i> of toll shipments					
EXPORT SHIPMENTS:²					
<i>Quantity</i> of export shipments					
<i>Value</i> of export shipments					
END-OF-PERIOD INVENTORIES³ (<i>quantity</i>)					
U.S. SHIPMENTS TO DISTRIBUTORS (<i>quantity</i>)					
U.S. SHIPMENTS TO END USERS (<i>quantity</i>)					
AVERAGE NUMBER OF PRWs					
HOURS WORKED BY PRWs (<i>1,000 hours</i>)					
WAGES PAID TO PRWs (<i>value</i>)					

¹ 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 1999, 2000, and 2001 below:

² Identify your principal export markets: _____

³ **Reconciliation of data.**--Please note that the **quantities** 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?

Yes No--Please explain: _____

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

II-11. If you reported transfers to related firms in question II-10, please indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced by market or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-12. Other than direct imports, has your firm otherwise purchased UAN since January 1, 1999? (See definitions in the instruction booklet.)

No Yes--Report such purchases below for the specified periods.¹

<i>(Quantity in short tons, 32-percent nitrogen content basis; value in \$1,000)</i>					
Item	Calendar years			January-September	
	1999	2000	2001	2001	2002
PURCHASES FROM U.S. IMPORTERS² OF UAN PRODUCED IN--					
BELARUS:					
<i>Quantity</i>					
<i>Value</i>					
RUSSIA:					
<i>Quantity</i>					
<i>Value</i>					
UKRAINE:					
<i>Quantity</i>					
<i>Value</i>					
ALL OTHER COUNTRIES:					
<i>Quantity</i>					
<i>Value</i>					
PURCHASES FROM DOMESTIC PRODUCERS:²					
<i>Quantity</i>					
<i>Value</i>					
PURCHASES FROM OTHER SOURCES:²					
<i>Quantity</i>					
<i>Value</i>					
¹ Please indicate your reasons for purchasing this product. If your reasons differ by source, please elaborate.					
² 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.					
<hr/> <hr/>					

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

II-13. In the table below, please indicate the quantity (*in short tons*) of your U.S. shipments of each concentration of UAN in each period.

UAN concentration	Calendar years			January-September	
	1999	2000	2001	2001	2002
Quantity (<i>short tons</i>)					
28 percent nitrogen					
30 percent nitrogen					
32 percent nitrogen					
Other					
Total					

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to James Stewart (202-205-3196).

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

Company contact: _____
Name and title

Fax No. Phone No. E-mail address

III-2. When does your fiscal year end (month and day)? _____

If your fiscal year changed during the periods for which data are being reported, explain below:

III-3. Accounting basis.--The financial records of your firm are prepared on the basis of:

GAAP Tax Cash Other (specify) _____

III-4. Reports and statements.--Did your firm or your parent prepare any of the statements or documents listed below during the period of the investigation? If so, please submit copies of them along with your completed questionnaire unless they are available on the World Wide Web (including the Securities and Exchange Commission's EDGAR site).

My firm or parent does ___ or does not ___ prepare financial statements (annual reports, 10-K's). Are the above documents available on the World Wide Web?

	YES	NO
At the SEC's EDGAR site?		
At some other site? (WWW address _____)		

My firm or parent does ___ or does not ___ prepare internal profit-and-loss reports on UAN operations which indicate the cost of production of UAN.

My firm or parent does ___ or does not ___ prepare internal reports indicating the cost of production of UAN.

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

Product(s)	Share of sales
_____	_____
_____	_____
_____	_____

PART III.--FINANCIAL INFORMATION--Continued

III-6. **Operations on UAN.**--Report the revenue and related cost information requested below on the UAN operations of your U.S. establishment(s).¹ Note that internal consumption and transfers to related firms **must be valued at fair market value** and purchases and transfers from related firms **must be at cost**. **Please provide details of any non-recurring or extraordinary items included in data.** Provide data on a **calendar-year basis** in chronological order from left to right, and for the specified interim periods.

(Quantity in short tons, value in \$1,000)					
Item	Calendar years			January-September	
	1999	2000	2001	2001	2002
Net sales quantities:²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities					
Net sales values:²					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values					
Cost of goods sold (including internal consumption and transfers to related firms):					
Natural gas (at net cost)					
Ammonia (at net cost)					
Other raw materials					
Direct labor					
Other factory costs					
Total cost of goods sold					
Gross profit or (loss)					
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses					
Operating income or (loss)					
Other income and expenses:					
Interest expense					
All other expense items					
All other income items					
All other income or expenses, net					
Net income or (loss) before income taxes					
Depreciation/amortization included above					

¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

² 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.

PART III.--FINANCIAL INFORMATION--Continued

III-7. Sale of natural gas. --Have you sold, offered to sell, or initiated any sale negotiations or inquiries for natural gas (or natural gas purchase options) since January 1, 1999?

No Yes--Please provide details (e.g., date, quantities, price, to whom etc.).

III-8. Price of natural gas.--Report the quantity and value of natural gas used in the production of UAN during the specified periods. Provide data on a calendar-year basis in chronological order from left to right, and for the specified interim periods.

<i>(Quantity in MMBtu, value in \$1,000)</i>					
Item	Calendar year			January-September	
	1999	2000	2001	2001	2002
Quantity:					
Contract (fixed price provisions)					
Spot					
Other ¹					
Total quantity					
Value:					
Contract:					
Physical natural gas cost					
Offset of hedged (gain) loss					
Net cost of natural gas					
Spot:					
Physical natural gas cost					
Offset of hedged (gain) loss					
Net cost of natural gas					
Other:¹					
Physical natural gas cost					
Offset of hedged (gain) loss					
Net cost of natural gas					
Total value					
¹ Please explain.					

PART III.--FINANCIAL INFORMATION--Continued

III-9. Capital expenditures, research and development expenditures, and asset values.--Report your firm's capital expenditures and research and development expenditures on UAN, and the values of the property, plant, and equipment used in the production of UAN. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods.

(Value in \$1,000)					
Item	Calendar year			January-September	
	1999	2000	2001	2001	2002
Capital expenditures					
Research and development expenditures					
Property, plant, and equipment:					
Original cost					
Book value					

III-10. Since January 1, 1999, 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 UAN from Belarus, Russia, or Ukraine?

No Yes--My firm has experienced actual negative effects as follows:

Cancellation 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-11. Does your firm anticipate any negative impact of imports of UAN from Belarus, Russia, or Ukraine?

No Yes--My firm anticipates negative effects as follows:

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Gerry Benedick (202-205-3244) or e-mail: gbenedick@usitc.gov

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

Company contact: _____
Name and title Phone No.

Section IV-A.--PRICE DATA

This section requests net sales value (f.o.b. your U.S. shipping location(s)) and quantity data concerning your firm's U.S. shipments of the specified U.S.-produced UAN products (described below) on a monthly basis during January 2000-September 2002. Report the shipment value and quantity (pounds of contained nitrogen) data separately for (1) total sales shipments (f.o.b. basis) from all your U.S. selling locations combined to all U.S. customers, and (2) sales shipments (f.o.b. basis) from all your selling locations in each of the specified U.S. cities or their proximate locations, *but ONLY to receiving points of U.S. customers in each of the respective specified cities/proximate locations*. Report sales shipments only to those U.S. customers (distributors and dealers/retailers) unrelated to your firm. **Report the shipment value and quantity data net of returns, discounts, rebates, netbacks, any U.S. freight costs to the customers' receiving points that were absorbed by your firm, and any end-of-period price adjustments for volume targets or other reasons.**

Product 1.—Urea Ammonium Nitrate (UAN) in an aqueous solution of 32 percent nitrogen concentration.

Product 2.—Urea Ammonium Nitrate (UAN) in an aqueous solution of 28 percent nitrogen concentration.

Copy, as necessary, the table on page 16 to report separately for each UAN product and U.S. location specified at the top of the table for the periods requested.

Note: Please report, for each specified U.S. city/proximate location, UAN selling price data from your firm's selling points to its customers' receiving points, all located in the same specified city/proximate location. For instance, report, as applicable, all your firms' sales of its specified U.S.-produced UAN product from its shipping point(s) in Baltimore, MD/proximate location to all of its customers' (unrelated to your firm) receiving point(s) in Baltimore/proximate location. DO NOT report UAN sales data from your shipping points in the specified cities/proximate locations to U.S. customers' receiving point(s) located outside of the respective specified cities/proximate locations.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-A.--PRICE DATA--Continued

IV-A-1. Please report below for each table for which you report pricing data for a specified U.S. city/proximate location (1) the mode(s) of transportation your firm used to ship its U.S.-produced UAN from your U.S. plant(s) to its selling facility(ies) in the specified location, (2) the total cost (in dollars) of such transportation for the full period price data were reported, and (3) the location(s) (city and state) of your firm's U.S. plant(s) from which it shipped its U.S.-produced UAN to its selling facility(ies) in the specified cities/proximate locations. Note: Your firm may sell its product directly from its production plant in the specified city/proximate locations; for such sales the requested transportation costs would be zero.

Product 1:

Baltimore, MD: _____

Brunswick, GA: _____

New Orleans, LA: _____

San Francisco, CA: _____

Corpus Christi, TX: _____

Cincinnati, OH: _____

Product 2:

Baltimore, MD: _____

Brunswick, GA: _____

New Orleans, LA: _____

San Francisco, CA: _____

Corpus Christi, TX: _____

Cincinnati, OH: _____

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-A.--PRICE DATA--Continued

IV-A-2. Please report below for your U.S.-produced product 2 (28% UAN) for which you report pricing data, the weight of product 2 in pounds of contained nitrogen that your firm initially shipped from its production facilities as product 1 (32% UAN) and then diluted to 28% UAN when selling in locations closer to your customers. Report separately for all U.S. locations combined and each applicable specified city/proximate location. Report the requested weight of UAN for the full period price data were reported. Also, please explain the reason(s) for (1) any initial shipments of 32% UAN that were later diluted to 28% UAN, (2) direct shipments of 28% UAN, and (3) the customers' reason(s), if known, for purchasing 28% UAN instead of 32% UAN.

Product 2:

All U.S. locations combined: _____

Baltimore, MD: _____

Brunswick, GA: _____

New Orleans, LA: _____

San Francisco, CA: _____

Corpus Christi, TX: _____

Cincinnati, OH: _____

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-A.--PRICE DATA--Continued

IV-A-3. **COPY THIS PAGE AS NECESSARY.** Complete a separate page for each specified UAN product and U.S. location (check one box in each category for each page) for the specified periods requested.

Product 1 " Product 2 "

Location from which your firm shipped *and its customers received* the UAN:¹ All U.S. locations combined "

Baltimore, MD " Brunswick, GA " Corpus Christi, TX "
 New Orleans, LA " San Francisco, CA " Cincinnati, OH "

<i>(Quantity in pounds,¹ value in dollars)</i>								
Date of shipment	Quantity	U.S. F.O.B. Value ²	Date of shipment	Quantity	U.S. F.O.B. Value ²	Date of shipment	Quantity	U.S. F.O.B. Value ²
2000:			2001:			2002:		
Jan.			Jan.			Jan.		
Feb.			Feb.			Feb.		
Mar.			Mar.			Mar.		
Apr.			Apr.			Apr.		
May			May			May		
June			June			June		
July			July			July		
Aug.			Aug.			Aug.		
Sept.			Sept.			Sept.		
Oct.			Oct.			Oct.		
Nov.			Nov.			Nov.		
Dec.			Dec.			Dec.		

¹ Report pounds of contained nitrogen.

² Net, f.o.b. your U.S. plant, warehouse, or other shipping facility of your firm in or near the specified locations (i.e., gross values less all returns, discounts, rebates, netbacks, any U.S. freight to the customers' receiving points that was absorbed by your firm, and any end-of-period price adjustments for volume targets or other reasons). For each specified city/proximate location, report sales from your firm's selling point(s) ONLY to your customers' receiving point(s) in each respective city/proximate location.

¹ Report for the cities specified or a proximate location associated with each specified city. If reporting for a proximate location, please identify the location and estimate the distance, in miles, from the specified city.

Note: All reporting firms should report for each specified product they produced in the United States their total shipments from all U.S. locations combined to all U.S. customers (unrelated to the selling firm) and then, as applicable, from each of the specific U.S. cities/proximate locations, but, for the latter, ONLY to U.S. customers' receiving point(s) in the respective specified cities/proximate locations.

PART IV.--PRICING AND MARKET FACTORS--Continued

Unless otherwise instructed, please answer all questions in the rest of part IV based on your firm's total sales of its U.S.-produced UAN during January 1999-September 2002. Please explain any distinctions if your responses differ by sales to different types of U.S. customers, by types of UAN (different concentrations), and by modes of transportation. When responses involve discussion of the subject imported products, please note the specific subject country(ies) and, if applicable, the specific imported products, that you refer to. and explain in the margin if your responses differ by the subject country of origin and/or by the subject imported product. **Please respond fully to the questions and attach additional pages of discussion as needed; identify attached responses with the question number.**

Section IV-B.--PRICING PRACTICES

IV-B-1. Please report below your firm's total U.S. sales quantity (in short tons of contained nitrogen) of its U.S.-produced UAN during January 1999-September 2002 that were on a (1) long-term contract basis (multiple deliveries for more than 12 months after the purchase agreement), (2) short-term contract basis (multiple deliveries up to 12 months), (3) spot sales basis (usually one-time delivery, within 30 days of the purchase agreement), and (4) other types of sales (includes consignment arrangements where the prices you receive are directly affected by your customers' selling prices).

Long-term contracts	
Short-term contracts	
Spot sales	
Other sales	

IV-B-2. a) Please report the following provisions of your U.S. sales on a typical long-term contract basis that involved your U.S.-produced UAN.

What is the average duration of a contract? _____

How frequently are contracts renegotiated? _____

Does the contract fix quantity, price, or both? _____

Does the contract have a meet or release provision? _____

What are the standard quantity requirements, if any? _____

What is the price premium for sub-minimum shipments? ____ percent

Identify below the top two factors, in descending order, discussed/considered between your firm and its U.S. customers in arriving at a price for a typical long-term contract sale. If your firm uses/issues price lists, please enclose a copy of your most recent price list with your submission.

1. _____

2. _____

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-B.--PRICING PRACTICES--Continued

IV-B-2. b) Please discuss your two largest long-term contracts with U.S. customers for your U.S.-produced UAN, identifying the customer, the time period of each contract (beginning and ending delivery dates), the approximate total volume of UAN delivered under each contract, the specific UAN products, and the price provisions of each contract.

1. _____

2. _____

IV-B-3. Please report the following provisions of your U.S. sales on a typical short-term contract basis that involved your U.S.-produced UAN.

What is the average duration of a contract? _____

How frequently are contracts renegotiated? _____

Does the contract fix quantity, price, or both? _____

Does the contract have a meet or release provision? _____

What are the standard quantity requirements, if any? _____

What is the price premium for sub-minimum shipments? ____ percent

Identify below the top two factors, in descending order, discussed/considered between your firm and its U.S. customers in arriving at a price for a typical short-term contract sale. If your firm uses/issues price lists, please enclose a copy of your most recent price list with your submission.

1. _____

2. _____

IV-B-4. Identify below the top two factors, in descending order, discussed/considered between your firm and its U.S. customers in arriving at a price for a typical spot sale and typical other types of sales. If your firm uses/issues price lists, please enclose a copy of your most recent price list with your submission.

Spot sales:

1. _____

2. _____

Other types of sales (specify _____):

1. _____

2. _____

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-B.--PRICING PRACTICES--Continued

IV-B-5. a) What are the typical payment terms offered by your firm for its U.S.-produced UAN shipped to U.S. customers (e.g., 2/10 net 30 days, net 30 days, etc.)

_____?

b) Does your firm use price lists? Yes ___ No ___ (Check one) If yes, are your firm's price lists available to other firms? Yes ___ No ___ (Check one)

IV-B-6. a) On what basis does your firm typically quote prices of its U.S.-produced UAN to its U.S. customers: f.o.b. plant/warehouse/terminal ___ or delivered ___? (Check one)

b) If f.o.b., do your customers typically arrange the freight ___ or does your firm arrange the freight ___? (Check one)

c) If your firm arranges freight on its f.o.b. sales, does it typically prepay the freight ___ or send the products freight collect ___? (Check one)

d) Does your firm ever pay freight to your U.S. customers' locations *without charging for this full cost*? Yes ___ No ___? (Check one)

If yes--

Please indicate the sales volume (tons or value in dollars) or other requirement(s) that must be met for your firm to absorb U.S. shipping charges for delivery to your customers' facilities.

Please report below the total value (in dollars) of U.S. freight charges that your firm absorbed based on all its U.S. shipments of its domestically produced UAN products during 1999-2001 and January-September 2002.

1999:_____ 2000:_____ 2001:_____ Jan.-Sept. 2002:_____

IV-B-7. a) Please describe your firm's sales discount policy (quantity discounts, annual total volume (quantity or value) based discounts, etc.) or, in the absence of a formal policy, your firm's sales discount practices on U.S. sales of its domestically produced UAN. Do not include any payment-term discount covered in question IV-B-5(a).

b) Please report below the total value of sales discounts that your firm granted to its U.S. customers of its domestically produced UAN during 1999-2001 and January-September 2002.

1999:_____ 2000:_____ 2001:_____ Jan.-Sept. 2002:_____

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-C.--FACTORS AFFECTING PRICING

IV-C-1. a) Please discuss below how your firm's selling prices may differ by type of customer (e.g., distributor versus dealer/retailer), by type of sale (e.g., long-term contracts, short-term contracts, spot sales, and other types of sales--e.g., consignment sales), and by nitrogen concentration.

Type of customer: _____

Type of sale: _____

By nitrogen concentration: _____

b) How much more expensive is it for your firm to produce at its plant(s) 32 percent UAN than 28 percent UAN? Please respond as a percentage of the cost difference to the cost to produce 28 percent UAN and base your response on a typical cost of natural gas.

IV-C-2. a) Approximate the percentage of your firm's average total production cost per short ton of its total U.S.-produced UAN (equivalent 32-percent nitrogen content) that was accounted for by each of your top three inputs (consider inputs such as, but not necessarily limited to, natural gas, ammonia (if purchased), labor, electricity, etc.) during January 1999-September 2002. List below in descending order each input with its percentage total-cost share and identify the principal countries of origin of each material input that was listed as an input.

Input (1):		Percent of total cost:	
Input (2):		Percent of total cost:	
Input (3):		Percent of total cost:	
Country(ies) of origin of each material input listed above:			

b) Have your firm's purchase prices for each of its top 3 inputs used to produce the UAN in the United States generally increased, decreased, fluctuated, or remained stable during January 1999-September 2002? Please also discuss trends in your firm's total unit production costs during this period and identify any periods of fluctuation.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-C.--FACTORS AFFECTING PRICING

IV-C-2. c) Please indicate below how any changes in your total unit production costs, as noted above, affected your firm's production quantities and U.S. selling prices of its U.S.-produced UAN during January 1999-September 2002.

d) What are the highest costs of natural gas (in dollars per mmBtu)____ or, if purchased instead of natural gas, ammonia (in dollars per short ton)____ (check one) that your firm can pay and still profitably produce and sell the following fertilizers--UAN, anhydrous ammonia (if you purchase natural gas), urea, ammonium nitrate, and nitric acid? Base your response on the highest selling prices for these outputs that you experienced during January 1999-September 2002.

UAN_____ Anhydrous Ammonia_____ Urea_____

Ammonium nitrate_____ Nitric acid_____

e) Does your firm purchase natural gas (or ammonia) for each individual plant that it produces one or more of the above products____ or for all its plants collectively that produce one or more of the above products____? (Check one)

f) Please report below your firm's average quarterly prices and quantities for its purchases of natural gas (in dollars per mmBtu) or, if purchased instead of natural gas, ammonia (in dollars per short ton) during January 1999-September 2002 that was used, at least partially, to produce UAN during this period.

Dollars per mmBtu and mmBtu's _____		Dollars per short ton and short tons _____		(Check one)				
Quarter	1999		2000		2001		2002	
	Price	Quantity	Price	Quantity	Price	Quantity	Price	Quantity
Jan.-Mar.								
Apr.-June								
July-Sept.								
Oct.-Dec.							X	X

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-C.--FACTORS AFFECTING PRICING--Continued

IV-C-2. g) Are your firm's purchase prices of natural gas or, if purchased instead of natural gas, ammonia lower for larger quantities of the appropriate input? Yes ___ No ___ (Check one)
If yes, please identify, as appropriate, which products other than UAN your firm produces for sale, at the same plant that you produce UAN, that use your purchased natural gas or ammonia as an input (specify which input).

h) Please report below the quantity of your firm's total purchases of natural gas (in mmBtu's) ___ or ammonia (in short tons) ___ (check one) used, at least partially, to produce UAN during January 1999-September 2002 that were purchased on a spot basis (delivered in the month purchased) and forward purchases (delivered beyond the month purchased). Please also report the quantity percentage share of deliveries that were covered by hedge contracts for natural gas/ammonia. In addition, please explain the reason(s) for purchasing in the spot market and in the forward market.

	<u>Spot purchases</u>	<u>Share</u>	<u>Forward purchases</u>	<u>Share</u>
Natural gas:	_____	_____	_____	_____
Ammonia:	_____	_____	_____	_____

IV-C-3. a) Approximately what share of the quantity (in short tons of contained nitrogen) of your firm's domestic shipments of its U.S.-produced UAN occurred within the distances specified below during January 1999-September 2002? Also, for each distance category, approximately what percent of the total delivered prices (dollars per pound of contained nitrogen) of your U.S.-produced UAN to your U.S. customers was accounted for by U.S.-inland transportation costs and what is the typical transportation mode(s) (air-A, truck-T, rail-R, barge-B, or some combination of these modes--e.g., R-T; B-R; B-R-T; etc.)?

	<u>Shipment share</u>	<u>Freight share</u>	<u>Mode(s)</u>
Within 100 miles of your plant/warehouse	_____%	_____%	_____
100 to 500 miles from your plant/warehouse	_____%	_____%	_____
Over 500 miles from your plant/warehouse	_____%	_____%	_____
TOTAL	100 %		

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-C.--FACTORS AFFECTING PRICING--Continued

IV-C-3. b) Do U.S. freight-cost shares reported for the longer distances represent a competitive disadvantage for your firm vis-a-vis other U.S. producers or U.S. importers of the subject or non-subject imported UAN? Yes ___ No ___ (Check one) If yes, please discuss the extent of the disadvantage, the geographic area(s) involved, and identify any such firms and the country(ies) of origin of the UAN they sell.

c) Please identify below any changes in freight rates or availability of the various modes of transport (air, truck, train, or barge) that may have affected U.S. freight costs for shipping your U.S.-produced UAN directly to your domestic customers or to your selling facilities and then on to your customers during January 1999-September 2002. Also discuss how any reported changes affected your competitiveness in various U.S. locations during this period.

d) What is the geographic market area in the United States served by your firm's U.S.-produced UAN during January 1999-September 2002? Note any changes in your firm's market area coverage, the time period involved, and the reason(s) for any such changes during this period.

e) Please explain to what extent changes in selling prices of your UAN relative to changes in your costs of natural gas/ammonia affected the distance your firm was able to sell its U.S.-produced UAN during January 1999-September 2002.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-C.--FACTORS AFFECTING PRICING--Continued

IV-C-4. Please report/estimate approximately how much more expensive per pound of contained nitrogen is the shipping cost for your firm when shipping the same total weight of contained nitrogen as 28 percent UAN compared to 32 percent UAN from your U.S. plant/warehouse to U.S. customers for each of the distance categories shown below and based on the usual mode(s) of transportation most frequently used for each distance category. Report as a percentage of the difference in per-pound contained-nitrogen transportation costs to the transportation cost per pound of contained nitrogen of 32 percent UAN. Show the mode(s) of transportation on which the reported transportation costs are based for each distance category, and reference the different modes as defined in question IV-C-3a.

	<u>Shipping Differential</u>	<u>Mode(s)</u>
Within 100 miles of your plant/warehouse	_____ %	_____
100 to 500 miles from your plant/warehouse	_____ %	_____
Over 500 miles from your plant/warehouse	_____ %	_____

IV-C-5. a) What was the average lead time (in days) between a customer's order and the date of delivery for your firm's U.S. shipments of its U.S.-produced UAN directly from its production and, if applicable, from its U.S. inventory during January 1999-September 2002?

Shipments from production _____ Shipments from inventory _____

b) Have average lead times changed since January 1999? Yes ___ No ___ (Check one) If yes, note dates of any changes and explain how and why lead times changed and the significance it had on your ability to compete separately with the subject imported and non-subject imported UAN.

c) Was your firm unable to supply its U.S. customers with its U.S.-produced UAN at anytime during January 1999-September 2002? Yes ___ No ___ (Check one) If yes, please provide below for each such instance, the customers' names, delivery dates missed, quantities (short tons of contained nitrogen) involved, the nitrogen concentration(s) of UAN involved, and the reasons for any missed deliveries.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-C.--FACTORS AFFECTING PRICING--Continued

IV-C-6. a) How did exchanges (swaps) of UAN among U.S. suppliers (U.S. producers, importers, distributors, dealers/retailers, etc.) affected transportation logistics, shipping costs, and U.S. selling prices of UAN in general, and your U.S.-produced UAN in particular, in the U.S. market during January 1999-September 2002, compared to the absence of swaps?

Transportation logistics and shipping costs_____

Selling prices_____

b) Please identify the specific reasons why UAN swaps in general occur in the U.S. market, and identify and explain, if possible, the distribution-level of the U.S. market in which swaps are most prevalent (approximate based on your perception of short tons of contained nitrogen in the UAN involved)--e.g., among U.S. producers, among U.S. importers, among distributors, among dealers/retailers, between U.S. producers and importers, between distributors and dealers/retailers, etc.

c) Please identify below the various types of swaps involving UAN and indicate in decreasing order the prevalence of each type (approximate based on your perception of short tons of contained nitrogen involved) that occurred during January 1999-September 2002. Types of swaps could include, but not necessarily limited to, swaps of 32 percent UAN, swaps between 32 percent and 28 percent UAN, swaps involving a single country of origin, and swaps of one country-of-origin for another country-of-origin UAN.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-C.--FACTORS AFFECTING PRICING--Continued

IV-C-6. d) Report below the quantity (in short tons of contained nitrogen), of your U.S.-produced UAN that your firm swapped for (1) subject imported UAN, (2) non-subject imported UAN, and (3) other U.S.-produced UAN during each of the following periods: 1999, 2000, 2001, and January-September 2002.

Period	UAN from--		
	Subject countries	Non-subject countries	United States
1999			
2000			
2001			
Jan.-Sept. 2002			

e) Please discuss below the reasons for any loans of UAN among UAN suppliers in the U.S. market, the market level(s) at which UAN loans would be most prevalent (approximate based on your perception of short tons of contained nitrogen involved), and the quantity and frequency of such loans compared to UAN swaps that occurred during January 1999-September 2002. In addition, explain why UAN loans among suppliers would occur instead of swaps.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-D.--SUPPLY FACTORS

IV-D-1. Have there been any significant changes in the product range or marketing of UAN in the United States since January 1999?

- No Yes--Please describe below any such changes, the time periods any such changes occurred, and the impact such changes had on U.S. sales prices and quantities of your U.S.-produced UAN.

IV-D-2. Were your firm's exports of its U.S.-produced UAN subject to any tariffs, quotas, or other non-tariff barriers to trade in other countries during January 1999-September 2002?

- No Yes--Please describe any such barriers and any significant changes in such barriers that have occurred since January 1999, by country and, if applicable, by type of UAN product (note time periods of any changes in such barriers).

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-D.--SUPPLY FACTORS--Continued

IV-D-3. Describe how easily your firm has been able to shift sales of its U.S.-produced UAN between the U.S. market and foreign country markets since January 1999. In your discussion, please describe any long-term contracts, other sales arrangements, or other constraints (exclude foreign-country trade barriers already discussed in the previous response) that would prevent or retard your firm from shifting UAN between the U.S. and alternative country markets within a 12-month period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.

IV-D-4. Please explain your UAN production strategy at the single plant level during January 1999-September 2002 and discuss as a minimum the following:

a) In the short run, does your firm typically change its UAN operating capacity in response to an increase or decrease in demand for its UAN by restarting/closing individual UAN plants Yes ___ No ___ (check one) or does it keep each plant running but at reduced operating levels Yes ___ No ___ (check one)?

Please estimate below the cost and amount of time it takes to institute the changes in your firm's UAN operating capacity (as indicated above) in response to an increase or decrease in demand for its UAN.

In addition, please specify below the dates of any restarts, closures, or changes in operating levels during January 1999-September 2002, and note the quantity of UAN (in short tons of contained nitrogen) that was affected by such actions.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-D.--SUPPLY FACTORS--Continued

IV-D-4. b) Discuss the minimum level of capacity utilization (in percent) at which your firm would continue operating each of its UAN plants in the short run (12 months or less) and the minimum level of capacity utilization of each UAN plant in the long run (more than 12 months); also indicate the relative product mix between UAN and other products that you may also produce on the same equipment, at the reported level(s) of operation, in each UAN plant.

Short run _____

Long run _____

c) Specify the approximate average percentage share of total production costs that were variable and the share that were fixed in your firm's production of UAN during January 1999-September 2002; also, identify the specific costs that you consider variable and consider fixed during this period. If the fixed and variable cost mix fluctuated significantly during this period, please attach an explanation and specify the different cost shares and time period(s) such fluctuations occurred.

Variable costs _____

Fixed costs _____

d) Please explain below the reason(s) and extent to which your firm must produce and sell non-UAN products, such as anhydrous ammonia, solid urea, solid ammonium nitrate (fertilizer and/or non-fertilizer types), and nitric acid in (1) the same plant(s) that you also produce UAN and in (2) different plant(s) from which you produce UAN for your firm to be competitive in selling UAN in the U.S. market during January 1999-September 2002.

Same plant(s): _____

Different plant(s): _____

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-D.--SUPPLY FACTORS--Continued

Substitution in supply refers to output products that, based on market price considerations and producer technical requirements, can reasonably be expected to substitute for each other in production (assuming full capacity utilization) when the selling price of one output product changes vis-a-vis the price of another output product—some producers may require greater price changes than others before they switch production among the alternative output products.

IV-D-5. a) Please discuss below your firm's ability, within one year, to switch U.S. production among the full range of UAN products (e.g., UAN with nitrogen concentrations of 32%, 28% UAN, 30%, etc.) based on changes in relative selling prices of the various products. Describe such ability to switch as "strong," "moderate," or "weak," assuming that no excess capacity existed for you to expand production of one UAN product without decreasing production of another such product. Also, specify the factor(s) you considered when characterizing your ability to switch and identify any UAN products that you are unable to produce with your equipment.

b) Please discuss below your firm's ability, within one year, to switch U.S. production between UAN and any other products (such as, but not necessarily limited to, solid urea and/or ammonium nitrate (the latter for fertilizer and other uses), anhydrous ammonia, or nitric acid), based on changes in their relative selling prices, and using the ammonia that your firm produces or purchases to produce UAN. Describe such ability to switch as "strong," "moderate," or "weak," assuming that no excess capacity existed for you to expand production of the UAN products without decreasing production of other products (or vice versa). Please specify the factor(s) you considered when characterizing your ability to switch and identify any such other products.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-D.--SUPPLY FACTORS--Continued

IV-D-6. a) Please estimate below the cost and time required to construct a greenfield plant to produce UAN in the United States, including the facilities to produce urea and ammonium nitrate liquors. Please indicate the size of the plant for which you report in terms of annual short tons of capacity (32-percent equivalent concentration) to produce UAN.

b) Please estimate below the cost and time required to construct UAN production facilities at a plant that already produces solid urea and ammonium nitrate but does not have equipment to produce UAN. Please indicate the size of the UAN facilities for which you report in terms of annual short tons of capacity (32-percent equivalent concentration) to produce UAN.

IV-D-7. Please estimate below the cost and time required to restart a closed U.S. UAN plant. Please indicate the size of the plant for which you report in terms of annual short tons of capacity (32-percent equivalent concentration) to produce UAN.

IV-D-8. Please estimate below the cost and time required to increase UAN production capacity by adding to your current facilities in the United States. Please indicate the amount of any such additional capacity in terms of the added annual tons of capacity (32-percent nitrogen equivalent concentration) to produce UAN.

IV-D-9. Please provide as a separate attachment(s) to this request, to the extent possible, any studies, surveys, etc., that you are aware of that quantify and/or otherwise discuss UAN supply, including production capacity and capacity utilization, in (1) the United States, (2) each of the other major producing countries, including those subject to these investigations, and the major consuming countries, and (3) the world as a whole. Of particular interest is such data on an annual basis from 1999 to the present and forecasts of these supply data.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-D.--SUPPLY FACTORS--Continued

IV-D-10. Is UAN from more than one source ever commingled in the U.S. market?

No Yes

If yes--

At what market level(s) of UAN distribution (U.S. producers and importers, distributors, dealers/retailers, or farmers) is UAN from various countries most frequently commingled in the U.S. market? Please explain why commingling occurs most frequently at the level(s) indicated.

U.S. producers and importers: _____

Distributors: _____

Dealers/retailers: _____

Farmers: _____

Other (specify _____): _____

IV-D-11. What time(s) of the year are UAN storage tanks of the following types of suppliers normally full or near capacity in the U.S. market? Please explain.

U.S. producers and importers: _____

Distributors: _____

Dealers/retailers: _____

Other (specify _____): _____

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-E.--DEMAND FACTORS

IV-E-1. a) Is the U.S. UAN market subject to seasonal variations, business cycles, product cycles, and/or conditions of competition distinctive to this product industry? If yes, please identify the dates and durations of each such occurrence since January 1999 and, for seasonality, the approximate actual months of the year of peak consumption and of peak U.S. production.

b) Please discuss the impact of the new U.S. farm law (August 9, 2002) on expected U.S. demand for nitrogenous fertilizers in general and UAN in particular during each of the crop years 2003 and 2004.

c) Please identify the top three U.S. crops (in consumption of UAN) and the principal state(s) where they are grown for the UAN that you produce in the United States, and describe the UAN products that your firm produces for use in growing each of these crops and their associated geographic regions.

IV-E-2. Please provide as a separate attachment(s) to this request, to the extent possible, any studies, surveys, etc., that you are aware of that quantify and/or otherwise discuss UAN demand in (1) the United States, (2) each of the other major consuming countries and in the major producing countries, including those subject to these investigations, and (3) the world as a whole. Of particular interest is such data on an annual basis from 1999 to the present and forecasts of these demand data.

PART IV.--PRICING AND MARKET FACTORS--Continued

Section IV-E.--DEMAND FACTORS--Continued

IV-E-3. c) At what market level of distribution--(a) U.S. producers and importers, (b) distributors, (c) dealers/retailers, and (d) farmers--does any substitution (1) between UAN and alternative single-nutrient nitrogenous fertilizers and (2) among UAN products generally occur in the U.S. market? In addition, for each substitute-pair of products identified below, at what time of the year would any such substitution most likely occur, what crop(s) would be affected, and what are the principal state(s) where such crop(s) are grown?

Substitution between UAN and alternative products: _____

Substitution among UAN products: _____

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

Section IV-G.--COMPETITION FROM IMPORTS--LOST SALES

THIS SECTION IS TO BE COMPLETED ONLY FOR ALLEGATIONS INVOLVING LOST SALES OCCURRING AFTER THE FILING OF THE PETITION.

Since April 1, 2002: Did your firm lose sales of UAN to imports of these products from the subject countries?

Yes

No

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
- Date of your price quotation
- Quantity involved (32-percent nitrogen content basis)
- Your rejected price quotation (delivered basis)
- The country of origin of the competing imported product
- The accepted price quotation of the imported product (delivered basis)

Customer name, contact person, phone and fax numbers	UAN product (percent nitrogen)	Date of quote	Quantity (short tons of product)	Rejected U.S. price (\$/per nitrogen pound)	Country of origin	Accepted import price (\$/nitrogen pound)