

**PRODUCERS' QUESTIONNAIRE**

**PURIFIED CARBOXYMETHYLCELLULOSE FROM  
FINLAND, MEXICO, NETHERLANDS, AND SWEDEN**

*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 June 22, 2004**

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping investigations concerning carboxymethylcellulose (CMC) from Finland, Mexico, Netherlands, and Sweden (inv. No. 731-TA-1084-1087 (Preliminary)). 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)).

<p><b>Name of firm</b> _____</p> <p><b>Address</b> _____</p> <p><b>City</b> _____ <b>State</b> _____ <b>Zip code</b> _____</p> <p><b>World Wide Web address</b> _____</p> <p>Has your firm produced purified CMC (as defined in the instruction booklet) at any time since January 1, 2001?</p> <p><input type="checkbox"/> <b>NO</b> (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> <b>YES</b> (Read the instruction booklet carefully, complete all parts of the questionnaire, sign the certification, and return the entire questionnaire to the Commission)</p>
--

**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 signing 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 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*

\_\_\_\_\_  
*Signature of Authorized Official*

\_\_\_\_\_  
*Date*

( ) \_\_\_\_\_  
*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-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.

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

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 determinations in these investigations are affirmative and antidumping duty orders are issued, the Commission, pursuant to section 754 of the Tariff Act of 1930, will provide a list of firms supporting the petition to the Bureau of Customs and Border Protection 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 I.--GENERAL QUESTIONS--Continued**

I-5. Does your firm have any related firms, either domestic or foreign, which are engaged in importing purified CMC from Finland, Mexico, Netherlands, or Sweden into the United States or which are engaged in exporting purified CMC from Finland, Mexico, Netherlands, or Sweden to the United States?

No  Yes--List the following information.

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

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

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 Cynthia Trainor (202-205-3354; E-mail [cynthia.trainor@usitc.gov](mailto:cynthia.trainor@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 No. \_\_\_\_\_ E-mail address \_\_\_\_\_

II-2. Has your firm experienced any plant openings, relocations, expansions, acquisitions, consolidations, closures, or prolonged shutdowns because of strikes or equipment failure; curtailment of production because of shortages of materials; or any other change in the character of your operations or organization relating to the production of purified CMC since January 1, 2001?

No  Yes--Supply details as to the time, nature, and significance of such changes.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

II-3. Does your firm produce other products on the same equipment and machinery used in the production of purified CMC?

No  Yes--List the following information.

Basis for allocation of capacity data (e.g., sales): \_\_\_\_\_

Products produced on same equipment and share of total production in 2003 (in percent):

<u>Product</u>	<u>Percent</u>	<u>Product</u>	<u>Percent</u>
Purified CMC	_____	_____	_____
_____	_____	_____	_____

II-4. Please describe the constraint(s) that set the limit(s) on your production capabilities.

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

II-5. Does your firm produce other products using the same production and related workers employed to produce purified CMC?

No  Yes--List the following information.

Basis for allocation of employment data (e.g., sales): \_\_\_\_\_

Products produced using the same workers and share of total production in 2003 (in percent):

<u>Product</u>	<u>Percent</u>	<u>Product</u>	<u>Percent</u>
Purified CMC	_____	_____	_____
_____	_____	_____	_____

II-6. Since January 1, 2001, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of purified CMC?

No  Yes--Name firm: \_\_\_\_\_

II-7. Does your firm produce purified CMC in a foreign trade zone (FTZ)?

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

II-8. Since January 1, 2001, has your firm imported purified CMC?

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

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

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

(Quantity in 1,000 pounds, value in \$1,000)					
Item	Calendar years			January-March	
	2001	2002	2003	2003	2004
<b>AVERAGE PRODUCTION CAPACITY<sup>1</sup></b> (quantity)					
<b>BEGINNING-OF-PERIOD INVENTORIES</b> (quantity)					
<b>PRODUCTION</b> (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 to related firms					
Value <sup>2</sup> of transfers to related firms					
<b>EXPORT SHIPMENTS:<sup>3</sup></b>					
Quantity of export shipments					
Value of export shipments					
<b>END-OF-PERIOD INVENTORIES<sup>4</sup></b> (quantity)					
<b>U.S. SHIPMENTS TO DISTRIBUTORS</b> (quantity)					
<b>U.S. SHIPMENTS TO END USERS</b> (quantity)					
<b>AVERAGE NUMBER OF PRWs</b>					
<b>HOURS WORKED BY PRWs</b> (1,000 hours)					
<b>WAGES PAID TO PRWs</b> (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).

<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 2001, 2002, and 2003 below:

<sup>3</sup> Identify your principal export markets: \_\_\_\_\_.

<sup>4</sup> 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-10. If you reported transfers to related firms in question II-9, 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 at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

---



---

II-11. **U.S. shipments by enduse**.--Report your firm's U.S. shipments (commercial shipments and internal consumption) of purified CMC produced in your U.S. establishment(s), by major end use.

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>					
Item	Calendar years			January-March	
	2001	2002	2003	2003	2004
<b>FOOD:<sup>1</sup></b>					
Quantity					
Value					
<b>PERSONAL CARE, COSMETICS &amp; PHARMACEUTICALS:<sup>1</sup></b>					
Quantity					
Value					
<b>PAPER &amp; BOARD:<sup>1</sup></b>					
Quantity					
Value					
<b>OILFIELD:<sup>1</sup></b>					
Quantity					
Value					
<b>ALL OTHER:<sup>2</sup></b>					
Quantity					
Value					
<b>TOTAL U.S. SHIPMENTS:<sup>3</sup></b>					
Quantity					
Value					

<sup>1</sup> Please indicate the ranges of key product characteristics for reported U.S. shipments during 2003 as follows:

	Purity (percent)	Viscosity (cps)	Degree of substitution	Solution characteristics
Food . . . . .	_____	_____	_____	_____
Personal care, cosmetics, & pharmaceuticals . . . .	_____	_____	_____	_____
Paper & board . . . . .	_____	_____	_____	_____
Oilfield . . . . .	_____	_____	_____	_____

<sup>2</sup> Please describe: \_\_\_\_\_.

<sup>3</sup> U.S. shipment data should reconcile with data reported in section II-5.

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

II-12. Other than direct imports, has your firm otherwise purchased purified CMC since January 1, 2001? (See definitions in the instruction booklet.)

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

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>					
Item	Calendar years			January-March	
	2001	2002	2003	2003	2004
<b>PURCHASES FROM U.S. IMPORTERS<sup>2</sup> OF PRODUCT FROM--</b>					
<b>FINLAND:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>MEXICO:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>NETHERLANDS:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>SWEDEN:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>ALL OTHER COUNTRIES:</b>					
<i>Quantity</i>					
<i>Value</i>					
<b>PURCHASES FROM DOMESTIC PRODUCERS:<sup>2</sup></b>					
<i>Quantity</i>					
<i>Value</i>					
<b>PURCHASES FROM OTHER SOURCES:<sup>2</sup></b>					
<i>Quantity</i>					
<i>Value</i>					
<sup>1</sup> Please indicate your reasons for purchasing this product. If your reasons differ by source, please elaborate.  <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.  <hr/> <hr/>					

**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Chand Mehta (202-205-3174 or chand.mehta@usitc.gov).

III-1. Identify the individual who prepared or has knowledge of the requested financial information.

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

\_\_\_\_\_ Phone No. \_\_\_\_\_ Fax No.  
 \_\_\_\_\_ E-mail address \_\_\_\_\_ Company web address

III-2. 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 \_\_\_ 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 purified CMC, as well as those statements and worksheets used to compile data for your firm's questionnaire response.*

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

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

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

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

III-5. Other products.--Please list any other products you produced in the facilities in which you produced purified CMC, 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 purified CMC.--Report the revenue and related cost information requested below on the purified CMC 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. 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 Chand Mehta at (202) 205-3174 before completing this section of the questionnaire.

<b>(Quantity in 1,000 pounds, value in \$1,000)</b>					
Item	Fiscal years ended--			January-March	
	_____	_____	_____	2003	2004
<b>Net sales quantities:<sup>2</sup></b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities					
<b>Net sales values:<sup>2</sup></b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values					
<b>Cost of goods sold (including internal consumption and transfers to related firms):</b>					
Raw materials					
Direct labor					
Other factory costs					
Total cost of goods sold					
<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 or (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.

<sup>2</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.

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

III-7. Asset values.--Report the total assets associated with the production, warehousing, and sale of purified CMC. 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, and as of the end of the specified interim periods.

<b>(Value in \$1,000)</b>					
<b>Value of</b>	<b>Fiscal years ended--</b>			<b>January-March</b>	
	_____	_____	_____	<b>2003</b>	<b>2004</b>
<b>Assets associated with the production, warehousing, and sale of product:</b>					
<b>1. Current assets:</b>					
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 (describe _____)</b>					
<b>7. Other (describe _____)</b>					
<b>8. Total assets (lines 1.I., 2, 3, 4.C., 5, 6, and 7)</b>					

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

III-8. Capital expenditures and research and development expenditures.--Report your firm's capital expenditures and research and development expenditures on purified CMC. 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	Fiscal years ended--			January-March	
	_____	_____	_____	2003	2004
<b>Capital expenditures</b>					
<b>Research and development expenditures</b>					

III-9. Since January 1, 2001, 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 purified CMC from Finland, Mexico, Netherlands, or Sweden?

- 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-10. Does your firm anticipate any negative impact of imports of purified CMC from Finland, Mexico, Netherlands, or Sweden?

- 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; E-mail: gerald.benedick@usitc.gov)

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

Company contact: \_\_\_\_\_  
Name and title  
\_\_\_\_\_  
Phone No. E-mail address

**Section IV-A.--PRICE DATA**

This section requests quarterly net sales value data (on a delivered basis) and quantity data (in pounds) concerning your firm's U.S. shipments of its four specified U.S.-produced purified CMC products to U.S. end-user customers UNRELATED (by ownership) to your firm during January 2001-March 2004. If your firm sells the specified U.S.-produced products on a U.S. f.o.b. price basis, please estimate, to the extent possible, the net delivered selling value (for instance, add to the U.S. f.o.b. price the U.S.-inland freight (or an estimate of this freight) you charged to deliver these products to your end-user customers at their U.S. receiving location(s)). Report the U.S. delivered value and quantity data **NET of returns, discounts, allowances, rebates, and also deduct any U.S. freight to the customers' receiving points that was absorbed by your firm (i.e., not charged to your customers).**

**Product 1.**—High viscosity (approximately 1,000 to 3,000 Mpas in 1 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon-7HF; Noviant-Cekol 30,000; Akzo-Akucel AF278; Amtex-PE 31FG.

**Product 2.**—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon-7MF; Noviant-Cekol 300; Akzo-Akucel AF150; Amtex-PE 28FGH.

**Product 3.**—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), non-regulated applications (i.e., standard grade). The trade names of the suppliers for this product are: Aqualon-7MT; Noviant-Finnfix 300; Akzo-None; Amtex-PE 27 EXH.

**Product 4.**—High viscosity (minimum 1,500 Mmpas in 1 percent solution), degree of substitution 0.8 to 1.5 (i.e., 8 to 15 carboxymethyl groups per 10 anhydroglucose units), to oilfield customers. This product is often sold to customers bearing the particular customer's trade name for its oil drilling product, such as Drispac, Milpac, and Polypac. Less frequently, the product bears a proprietary name of the manufacturer, such as Aqualon's Aquapac or Akzo's Staflo. In all cases, the specifications and not the label on the bag should be the controlling factor in reporting.

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

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

**COPY THIS PAGE AS NECESSARY.** Complete a separate page for each specified purified CMC product produced by your firm AND shipped to U.S. end-user customers UNRELATED (by ownership) to your firm (check one box for each page).

Purified CMC Product: 1  2  3  4

<i>(Quantity in pounds, value in dollars)</i>		
Date of shipment	Quantity	Net delivered value <sup>2</sup>
<b>2001:</b>		
January-March		
April-June		
July-September		
October-December		
<b>2002:</b>		
January-March		
April-June		
July-September		
October-December		
<b>2003:</b>		
January-March		
April-June		
July-September		
October-December		
<b>2004:</b>		
January-March		
<sup>1</sup> Net delivered value to your U.S. end-user customers' receiving location(s).		

**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 U.S. sales of its U.S.-produced purified CMC to all U.S. customers during January 2001-March 2004. If your responses differ by sales to different types of U.S. customers (end users, distributors, or types of end users) or grades, viscosity, or granular sizes of purified CMC that you produce, please explain in the margin or attach a separate response. **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 1,000 of pounds) of its U.S.-produced purified CMC during January 2001-March 2004 that were on a (1) long-term basis (multiple deliveries for more than 12 months after the purchase agreement), (2) short-term basis (multiple deliveries up to 12 months), and (3) spot sales basis (usually one-time delivery, within 30 days of the purchase agreement). The three different sales bases include both written contracts and verbal agreements.

Type of Sale:	Quantity (in 1,000 pounds)
Long-term	
Short-term	
Spot sales	

IV-B-2. Please discuss the following provisions of your U.S. sales on a typical long-term basis that involved your U.S.-produced purified CMC.

- (a) What is the average duration of a contract? \_\_\_\_\_
- (b) How frequently are contracts renegotiated? \_\_\_\_\_
- (c) Does the contract fix quantity, price, or both? \_\_\_\_\_
- (d) Does the contract have a meet or release provision? \_\_\_\_\_
- (e) What are the standard quantity requirements, if any? \_\_\_\_\_
- (f) What is the price premium for sub-minimum shipments? \_\_\_\_ percent

IV-B-3. Please discuss the following provisions of your U.S. sales on a typical short-term basis that involved your U.S.-produced purified CMC.

- (a) What is the average duration of a contract? \_\_\_\_\_
- (b) How frequently are contracts renegotiated? \_\_\_\_\_
- (c) Does the contract fix quantity, price, or both? \_\_\_\_\_
- (d) Does the contract have a meet or release provision? \_\_\_\_\_
- (e) What are the standard quantity requirements, if any? \_\_\_\_\_
- (f) What is the price premium for sub-minimum shipments? \_\_\_\_ percent

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

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

IV-B-4. Please describe below how your firm determines the prices that it charges for long-term and short-term sales of purified CMC to its U.S. customers (e.g., negotiate prices each transaction, the role of quantity sold in arriving at prices, prices set by your price lists, use follow-up price quotes, sell purified CMC bundled with other products you produce, etc.). If your firm uses/issues price lists, please enclose a copy of the most recent price list, if possible, with your submission. Note if the price list differs by type of customer.

Long-term: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Short-term: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

IV-B-5. Please explain how prices are established for sales of your U.S.-produced purified CMC on a spot basis.

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

IV-B-6. What are your firm's typical payment terms on sales of its U.S.-produced purified CMC shipped to U.S. customers during January 2001-March 2004 (e.g., 2/10 net 30 days, net 30 days, etc.)

\_\_\_\_\_?

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

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

- IV-B-7. a) On what basis does your firm typically quote prices of its U.S.-produced purified CMC to its U.S. customers: f.o.b. plant/warehouse \_\_\_\_ 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 cost*? Yes \_\_\_\_ No \_\_\_\_? (Check one)

If yes--

Please indicate the total quantity or value of purified CMC or other requirement(s) that must be purchased by your customers from your firm to absorb U.S. shipping charges to their 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 purified CMC during 2001 and 2003.

2001: \_\_\_\_\_ 2003: \_\_\_\_\_

- IV-B-8. Please describe terms of your firm's discount policy, if any, (quantity discounts per shipment, annual total volume (quantity or value) based discounts, etc.) on U.S. sales of its U.S.-produced purified CMC during January 2001-March 2004. Do not include any payment discounts covered in question IV-B-6.

---



---



---

Please report below the total value (in dollars) of discounts that your firm allowed based on a the discount policy terms, if any, cited above for all its U.S. shipments of its U.S.-produced purified CMC during 2001 and 2003.

2001: \_\_\_\_\_ 2003: \_\_\_\_\_

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

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

IV-C-1. a) Approximately what share of the total sales quantity (based on weight) of your firm's domestic shipments of its U.S.-produced purified CMC to its U.S. customers during January 2001-March 2004 occurred within the distances specified below? Also, for each distance category, approximately what percent of the total net delivered sales value of these products to your U.S. customers was accounted for by U.S.-inland transportation costs and what was the typical transportation mode (truck-T, rail-R, or air-A)?

	<u>Shipment share</u>	<u>Freight share</u>	<u>Mode</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 %	NA	NA

b) What is the geographic market area in the United States served by your firm's U.S.-produced purified CMC during January 2001-March 2004?

- |                                    |   |                                     |                                    |
|------------------------------------|---|-------------------------------------|------------------------------------|
| <input type="checkbox"/> Northeast | <input type="checkbox"/> Mid-Atlantic           | <input type="checkbox"/> Midwest    | <input type="checkbox"/> Southeast |
| <input type="checkbox"/> Southwest | <input type="checkbox"/> Rocky Mountains        | <input type="checkbox"/> West Coast | <input type="checkbox"/> Northwest |
| <input type="checkbox"/> National  | <input type="checkbox"/> Other (describe) _____ |                                     |                                    |

Note any changes in your U.S. market area since January 2001.

---



---

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

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

IV-C-2. a) What was the average lead time (in days) between a customer's order and the date of delivery for your firm's 2003 U.S. shipments of its U.S.-produced purified CMC from its production and, if applicable, from its U.S. inventory?

Source	Share of 2003 sales quantity	Lead time
From inventory		
Direct from production		
<b>Total</b>	<b>100%</b>	

b) Have average lead times changed since January 2001? 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 with the subject imported purified CMC.

---

---

IV-C-3. Does your firm sell its U.S.-produced purified CMC over the internet?

No       Yes

If yes-

Please report the quantity (in 1,000 of pounds) of your firm's total U.S. shipments of its U.S.-produced purified CMC during January 2001-March 2004 that was sold over the internet.

Please explain the effect of any internet sales on your U.S. selling prices and quantities.

---

---

**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 purified CMC in the United States since January 2001?

- 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 purified CMC

---

---

---

IV-D-2. Based on your two largest sales of your U.S.-produced purified CMC to end users during January 2001-March 2004, identify, to the extent possible, the principal end-use product associated with each sale and the percentage share of the total cost to produce the end product accounted for by purified CMC?

<u>End use product</u>	<u>Share of total cost accounted for by purified CMC (percent)</u>
------------------------	--

_____	_____
_____	_____

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

**Section IV-E.--DEMAND FACTORS**

IV-E-1. How has the demand for purified CMC in the United States (and outside the United States, if known,) changed since January 1, 2001? What principal factors affected any changes in demand?

- Increased
- Unchanged
- Decreased
- Fluctuated

---



---



---



---



---

*Substitution in demand refers to products that can, based on market price considerations and residential consumer/industrial user preferences/technical requirements, reasonably be expected to substitute for each other when the price of one product changes vis-a-vis the price of the other product—some consumers/industrial users may require greater price changes than others before they switch among the alternative products.*

Discuss substitution in demand between purified CMC and alternative products— e.g., crude/unrefined CMC, fluidized polymer suspensions, cross-linked purified CMC, other hydrocolloids, etc. (question IV-E-2).

IV-E-2. a) Please list in descending order of importance the top three products that may substitute for purified CMC, or vice-a-versa, in the U.S. market, based on your firm's experience during January 2001-March 2004, and show the type of purified CMC product that each alternative product is the most probable substitute for.

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

b) For each possible substitute product-pair listed, please note the most likely principal application(s)/ end-use product(s) in which they may substitute for each other.

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

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

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

IV-E-2. c) To what extent do changes in the relative prices of the substitute product-pairs affect the price or quantity of the purified CMC product. What is the time lag for any such impact and does this vary by type of CMC or final end-use?

- 1. \_\_\_\_\_  
\_\_\_\_\_
- 2. \_\_\_\_\_  
\_\_\_\_\_
- 3. \_\_\_\_\_  
\_\_\_\_\_

Discuss substitution in demand among various types (grade, viscosity, end-use, granular size, etc) of purified CMC (question IV-E-3).

IV-E-3. a) Please list in descending order of importance the top three pairs of purified CMC types that may substitute for each other in the U.S. market, based on your firm's experience during January 2001-March 2004.

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

b) For each possible substitute product-pair listed, please note the most likely application(s)/end-use product(s) for which they may be substitutes.

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

c) To what extent do changes in the relative prices of the substitute product-pairs affect the price or quantity of one purified CMC product vis-a-vis another. What is the time lag for any such impact and does this vary by type of CMC or final end-use?

- 1. \_\_\_\_\_  
\_\_\_\_\_
- 2. \_\_\_\_\_  
\_\_\_\_\_
- 3. \_\_\_\_\_  
\_\_\_\_\_

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

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

IV-E-4. Are all types/styles of purified CMC produced in the United States, imported from the subject countries, and imported from other countries used interchangeably (i.e., can they physically be used in the same applications)? Please indicate below, using "A" to indicate that the products from a specified country-pair are *always* interchangeable, "F" to indicate that the products are *frequently* interchangeable, "S" to indicate that the products are *sometimes* interchangeable, "N" to indicate that the products are *never* interchangeable, and "0" to indicate *no familiarity* with products from a specified country-pair.<sup>1</sup>

Country-pair	United States	Finland	Mexico	Netherlands	Sweden	Other countries
United States						
Finland						
Mexico						
Netherlands						
Sweden						

<sup>1</sup> For any country-pair producing purified CMC which is *sometimes or never* interchangeable, please explain the factors that limit or preclude interchangeable use. Also, identify any "other" countries referred to.

---



---



---



---



---



---



---



---



---



---

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

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

IV-E-5. Are differences other than price (i.e., quality, availability, transportation network, product range, technical support, etc.) between purified CMC produced in the United States, imported from the subject countries, and imported for other countries a significant factor in your firm's sales of the U.S.-produced products? Please indicate below, using "A" to indicate that such differences are *always* significant, "F" to indicate that such differences are *frequently* significant, "S" to indicate that such differences are *sometimes* significant, "N" to indicate that such differences are *never* significant, and "0" to indicate *no familiarity* with products from a specified country-pair.<sup>1</sup>

Country-pair	United States	Finland	Mexico	Netherlands	Sweden	Other countries
United States						
Finland						
Mexico						
Netherlands						
Sweden						

<sup>1</sup> For any country-pair for which factors other than price *always or frequently* are a significant factor in your firm's sales of U.S.-produced purified CMC, identify the country-pair, the type of purified CMC, and report the advantages or disadvantages imparted by such factors. Also, identify any "other" countries referred to.

---



---



---



---



---



---



---



---



---



---

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

**Section IV-F.--CUSTOMER IDENTIFICATION**

Please provide the names and addresses of your firm's 10 largest U.S. customers for its domestically-produced purified CMC during January 2001-March 2004. Please also provide the name and telephone number of a contact person and the percentage share of the quantity (based on weight) of your firm's total domestic sales of its U.S.-produced purified CMC that each of these customers accounted for in 2003. For any customers related to your firm, place an ® by the name of each such customer.

<b>No.</b>	<b>Customer's name</b>	<b>Street address, state, and zip code</b>	<b>Contact person</b>	<b>Area code and telephone number</b>	<b>Share of 2003 sales (%)</b>
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					



