

U.S. PRODUCERS' QUESTIONNAIRE

SEAMLESS REFINED COPPER PIPE AND TUBE FROM CHINA AND MEXICO

This questionnaire must be received by the Commission by no later than August 9, 2010

See page 4 of the Instruction Booklet for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its antidumping investigations concerning seamless refined copper pipe and tube from China and Mexico (Inv. Nos. 731-TA-1174-1175 (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)).**

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>World Wide Web address _____</p> <p>Has your firm produced seamless refined copper pipe and tube (as defined in the instruction booklet) at any time since January 1, 2007?</p> <p><input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> YES (Read the instruction booklet carefully, complete all parts of the questionnaire, and return the entire questionnaire to the Commission so as to be received by the date indicated above)</p>
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CERTIFICATION

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

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

I acknowledge that information submitted in this questionnaire response and throughout these investigations may be used by the Commission, its employees, and contract personnel who are acting in the capacity of Commission employees, for developing or maintaining the records of this investigation 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 of Authorized Official

Title of Authorized Official

Date

Signature

Phone: ()

Fax ()

E-mail address

PART I.—GENERAL INFORMATION

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

I-1a. **OMB statistics**--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. **OMB feedback**--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. **Establishments covered**--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. **Petition support**--Do you support or oppose the petition?

Support Oppose Take no position

PART I.--GENERAL INFORMATION--Continued

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

No Yes--List the following information

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

I-5. **Related importers/exporter.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing seamless refined copper pipe and tube from China or Mexico into the United States or which are engaged in exporting seamless refined copper pipe and tube from China or Mexico to the United States?

No Yes--List the following information

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

I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which are engaged in the production of seamless refined copper pipe and tube?

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 **Edward Petronzio (202-205-3176, edward.petronzio@usitc.gov)**. **Supply all data requested on a calendar-year basis.**

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

Company contact: _____
Name and title

() _____
Phone number E-mail address

II-2. **Changes in operations**--Please indicate whether your firm has experienced any of the following changes in relation to the production of seamless refined copper pipe and tube since January 1, 2007?

<i>(check as many as appropriate)</i>	<i>(please describe)</i>
<input type="checkbox"/> plant openings	_____
<input type="checkbox"/> plant closings.....	_____
<input type="checkbox"/> relocations	_____
<input type="checkbox"/> expansions	_____
<input type="checkbox"/> acquisitions.....	_____
<input type="checkbox"/> consolidations.....	_____
<input type="checkbox"/> prolonged shutdowns or production curtailments	_____
<input type="checkbox"/> revised labor agreements.....	_____
<input type="checkbox"/> other (e.g., technology)	_____

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

II-3. **Same equipment, machinery, and workers.**--Has your firm since 2007 produced, or does your firm anticipate producing in the future, other products on the same equipment and machinery used in the production of seamless refined copper pipe and tube and/or using the same production and related workers employed to produce seamless refined copper pipe and tube?

- No Yes--List the following information and report your firm's combined production capacity and production of these products and seamless refined copper pipe and tube in the periods indicated.

<u>Product</u>	<u>Period</u>	<u>Basis for allocation of capacity and employment data (indicate if different)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

<i>(Quantity in 1,000 pounds)</i>					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
Overall Production Capacity					
Production of: Seamless Refined Copper Pipe and Tube					
Other product 1 _____					
Other product 2 _____					

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

II-5. **Tolling.**--Since January 1, 2007, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of seamless refined copper pipe and tube?

- No Yes--Name firm(s): _____.

II-6. **Foreign trade zone.**--Does your firm produce seamless refined copper pipe and tube in a foreign trade zone (FTZ)?

- No Yes--Identify FTZ(s): _____.

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

II-7. **Importer**--Since January 1, 2007, has your firm imported seamless refined copper pipe and tube?

No

Yes--**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

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

II-8. **Trade data.**--Report your firm's production capacity, production, shipments, inventories, and employment related to the production of seamless refined copper pipe and tube in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet.)

Please note: The data reported in the table below should include **both industrial and plumbing** seamless refined copper pipe and tube. Questions V-2 and V-3 request that you report this data separately.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
Average production capacity ¹ (quantity)					
Beginning-of-period inventories (quantity)					
Production (quantity)					
U.S. shipments:					
Commercial shipments:					
Quantity of commercial shipments					
Value of commercial shipments					
Internal consumption:					
Quantity of internal consumption					
Value ² of internal consumption					
Transfers to related firms:					
Quantity of transfers					
Value ² of transfers					
Export shipments: ³					
Quantity of export shipments					
Value of export shipments					
End-of-period inventories ⁴ (quantity)					
Channels of distribution:					
U.S. shipments to distributors (quantity)					
U.S. shipments to end users (quantity)					
Employment data:					
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (value)					
¹ 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).					
² 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 each of the periods noted above:					
³ Identify your principal export markets: _____					
⁴ 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?					
<input type="checkbox"/> Yes <input type="checkbox"/> No--Please explain: _____					

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

II-9. **Related firms.**--If you reported transfers to related firms in question II-8, 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-10. **Purchases.**--Other than direct imports, has your firm otherwise purchased seamless refined copper pipe and tube since January 1, 2007? (See definitions in the instruction booklet.)

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

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
PURCHASES FROM U.S. IMPORTERS² OF SEAMLESS REFINED COPPER PIPE AND TUBE FROM--					
China:					
<i>Quantity</i>					
<i>Value</i>					
Mexico:					
<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. <hr/>					
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/>					

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to **Mary Klir (202-205-3247, mary.klir@usitc.gov)**.

III-1. **Contact information (financial)**--Who should be contacted regarding the requested financial information?

Company contact: _____
 Name and title

() _____
 Phone number E-mail address

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

A. When does your fiscal year end (month and day)? _____
 If your fiscal year changed during the period examined, explain below:

B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include subject merchandise:

2. Does your firm prepare profit/loss statements for the subject merchandise:
 Yes No

3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.
 Audited, unaudited, annual reports, 10Ks, 10Qs,
 Monthly, quarterly, semi-annually, annually

4. Accounting basis: GAAP, cash, tax, or other comprehensive (specify) _____

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

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

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

PART III.--FINANCIAL INFORMATION--Continued

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

<u>Products</u>	<u>Share of sales</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

III-6. Does your firm receive inputs (raw materials, labor, energy, or any other services) used in the production of seamless refined copper pipe and tube from any related firm?

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

III-7. **Inputs from related firms.**--In the space provided below, identify the inputs used in the production of seamless refined copper pipe and tube that your firm receives from related parties.

<u>Input</u>	<u>Related party</u>
_____	_____
_____	_____
_____	_____
_____	_____

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

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

PART III.--FINANCIAL INFORMATION--Continued

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

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

Yes No

III-10. **Nonrecurring charges.**--For each annual and interim period for which financial results are reported in question III-11, please indicate in the schedule below the specific nonrecurring charges, the particular expense/cost line items from question III-11 where the associated charges are included, a brief description of the charges, and the associated values (*in \$1,000*). Nonrecurring charges would include, but are not limited to, items such as asset write-offs and accelerated depreciation due to restructuring of the company's seamless refined copper pipe and tube operations.

Item	Fiscal years ended--			January-June	
	_____	_____	_____	2009	2010
Non-recurring charges: (In this column please provide a brief description of each nonrecurring charge and indicate the particular expense/cost line items where the associated charges are included in question III-11.)					
1.					
2.					
3.					
4.					
5.					
6.					
7.					

PART III.--FINANCIAL INFORMATION--Continued

III-11. Operations on seamless refined copper pipe and tube.--Report the revenue and related cost information requested below on the seamless refined copper pipe and tube operations of your U.S. establishment(s).¹ **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.**² Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods.

Note: The data reported in this table should include **both industrial and plumbing** seamless refined copper pipe and tube. Questions V-2 and V-3 request that you report certain financial data separately.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Fiscal years ended--			January-June	
	_____	_____	_____	2009	2010
Net sales quantities: ³					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities					
Net sales values: ³					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values					
Cost of goods sold (COGS): ⁴					
Raw materials					
Direct labor					
Other factory costs					
Total COGS					
Gross profit or (loss)					
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses					
Operating income (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 Please list the expense categories and amounts of any profits on internal inputs or inputs from related firms that are reflected on your books but which are eliminated from the costs reported below.

³ 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.

⁴ COGS should include costs associated with internal consumption and transfers to related firms.

PART III.--FINANCIAL INFORMATION--Continued

III-12. **Asset values.**--Report the total assets associated with the production, warehousing, and sale of seamless refined copper pipe and tube. 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.

Note: The data reported in this table should include **both industrial** and **plumbing** seamless refined copper pipe and tube. Questions V-2 and V-3 request that you report certain financial data separately.

Value (in \$1,000)			
Item	Fiscal years ended--		
	_____	_____	_____
Assets associated with the production, warehousing, and sale of product:			
1. Current assets:			
A. Cash and equivalents			
B. Accounts receivable, net			
C. Inventories			
D. Other (describe: _____)			
E. Total current assets (lines 1.A. through 1.D.)			
2. Property, plant, and equipment			
A. Original cost of property, plant, and equipment			
B. Less: Accumulated depreciation			
C. Equals: Book value of property, plant, and equipment			
3. Other (describe: _____)			
4. Total assets (lines 1.E., 2.C., and 3)			

III-13. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses on seamless refined copper pipe and tube. Provide data for your three most recently completed fiscal years in chronological order from left to right, and for the specified interim periods.

Note: The data reported in this table should include **both industrial** and **plumbing** seamless refined copper pipe and tube. Questions V-2 and V-3 request that you report certain financial data separately.

Value (in \$1,000)					
Item	Fiscal years ended--			January-June	
	_____	_____	_____	2009	2010
Capital expenditures					
Research and development expenses					

PART III.--FINANCIAL INFORMATION--Continued

III-14. **Effects of imports**--Since January 1, 2007, 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 seamless refined copper pipe and tube from China or Mexico?

- 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-15. **Anticipated effects of imports**--Does your firm anticipate any negative impact of imports of seamless refined copper pipe and tube from China or Mexico?

PART V.-- ALTERNATIVE PRODUCTS--TRADE AND RELATED INFORMATION

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

IV-1. **Contact information (price).**--Who should be contacted regarding the requested pricing and related information?

Company contact:

()

PRICE DATA

This section requests quarterly quantity and value data, f.o.b. your U.S. point of shipment, for your commercial shipments to unrelated U.S. customers during January 2007–June 2010 of the following products produced by your firm.

Product 1.-- Seamless refined copper pipe and tube, 1/2" Type L, hard temper, 20' lengths

Product 2.-- Seamless refined copper pipe and tube, 3/4" Type M, hard temper, 20' lengths

Product 3.-- Seamless refined copper pipe and tube, 3/8" OD, ACR/RST coil, 50'-100' lengths

Product 4.-- Seamless refined copper pipe and tube, 3/4" OD, ACR/RST coil, 50'-100' lengths

Product 5.-- Seamless refined copper pipe and tube, 3/8" OD, inner-grooved LWC, 0.0110"-0.0144" bottom wall thickness

Product 6.-- Seamless refined copper pipe and tube, 5/16" OD, inner grooved LWC, 0.01170-0.0125" bottom wall thickness

Product 7.-- Seamless refined copper pipe and tube, 3/8" OD, smooth bore LWC, 0.0249"-0.0327" bottom wall thickness

Product 8.-- Seamless refined copper pipe and tube, 3/4" OD, smooth bore LWC, 0.0327"-0.0430" bottom wall thickness

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

Please report data for products sold for plumbing applications on a separate page than data for industrial applications.

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

IV-2. **Pricing data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm. Please report data for products sold for plumbing applications on a separate page than data for industrial applications.

Plumbing applications Industrial applications

(Quantity in pounds, value in dollars)				
Period of shipment	Product 1		Product 2	
	Quantity	Value	Quantity	Value
2007:				
January-March				
April-June				
July-September				
October-December				
2008:				
January-March				
April-June				
July-September				
October-December				
2009:				
January-March				
April-June				
July-September				
October-December				
2010:				
January-March				
April-June				

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

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

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

Product 1: _____

Product 2: _____

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

IV-2. **Pricing data.**—*Continued.* Please report data for products sold for plumbing applications on a separate page than data for industrial applications.

Plumbing applications Industrial applications

(Quantity in pounds, value in dollars)				
Period of shipment	Product 3		Product 4	
	Quantity	Value	Quantity	Value
2007:				
January-March				
April-June				
July-September				
October-December				
2008:				
January-March				
April-June				
July-September				
October-December				
2009:				
January-March				
April-June				
July-September				
October-December				
2010:				
January-March				
April-June				

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

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

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

Product 3: _____

Product 4: _____

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

IV-2. **Pricing data.**—*Continued.* Please report data for products sold for plumbing applications on a separate page than data for industrial applications.

Plumbing applications Industrial applications

(Quantity in pounds, value in dollars)				
Period of shipment	Product 5		Product 6	
	Quantity	Value	Quantity	Value
2007:				
January-March				
April-June				
July-September				
October-December				
2008:				
January-March				
April-June				
July-September				
October-December				
2009:				
January-March				
April-June				
July-September				
October-December				
2010:				
January-March				
April-June				

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point of shipment.
² Pricing product definitions are provided on the first page of Part IV.

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

Product 5: _____

Product 6: _____

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

IV-2. **Pricing data.**—*Continued.* Please report data for products sold for plumbing applications on a separate page than data for industrial applications.

Plumbing applications Industrial applications

(Quantity in pounds, value in dollars)				
Period of shipment	Product 7		Product 8	
	Quantity	Value	Quantity	Value
2007:				
January-March				
April-June				
July-September				
October-December				
2008:				
January-March				
April-June				
July-September				
October-December				
2009:				
January-March				
April-June				
July-September				
October-December				
2010:				
January-March				
April-June				

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point of shipment.
² Pricing product definitions are provided on the first page of Part IV.

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

Product 7: _____

Product 8: _____

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

When responding to questions in this section, please indicate when your response varies by plumbing applications or industrial applications.

IV-3. **Price setting.**—

- (a) How does your firm determine the prices that it charges for sales of seamless refined copper pipe and tube (*check all that apply*)? If your firm issues price lists, please include a copy of a recent price list with your submission. If your price list is large, please only submit some sample pages.

Type of price setting	Plumbing applications	Industrial applications
Transaction by transaction	<input type="checkbox"/>	<input type="checkbox"/>
Contracts	<input type="checkbox"/>	<input type="checkbox"/>
Set price lists	<input type="checkbox"/>	<input type="checkbox"/>
Internet sales	<input type="checkbox"/>	<input type="checkbox"/>
Other--Please describe below _____	<input type="checkbox"/>	<input type="checkbox"/>

Other--Please describe: _____

- (b) Does the quotation period of copper purchases influence your selling prices of seamless refined copper pipe and tube?

No Yes-Please explain.

- (c) Does your firm offer hedging transactions that might lock the copper price for long periods of time?

No Yes-Please explain the nature of your hedging transactions.

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

(d) Do variations or changes in the COMEX, LME, or other copper benchmarks affect your overall price lists?

- No Yes-Please explain.

IV-4. Discount policy.—

(a) Please indicate and describe your firm's discount policies (*check all that apply*).

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

(b) Does your company have a rebate program for any of your purchasers of seamless refined copper pipe and tube?

- No Yes-How is the rebate program reflected in the net pricing agreed to with each customer and in the price data reported in this question IV-2? What is the approximate percentage of the total delivered cost of seamless refined copper pipe and tube that is accounted for by these rebates? _____ percent

IV-5. Pricing terms for seamless refined copper pipe and tube.--

(a) What are your firm's typical sales terms for its U.S.-produced seamless refined copper pipe and tube (*e.g.*, 2/10 net 30 days)? _____.

(b) On what basis are your prices of domestic seamless refined copper pipe and tube usually quoted? (check one)

- F.o.b.--Please specify point: _____ Delivered

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

IV-6. **Contract versus spot.**--Approximately what share of your firm's sales of its U.S.-produced seamless refined copper pipe and tube in 2009 were on a (1) long-term contract basis (multiple deliveries for more than 12 months), (2) short-term contract basis (multiple deliveries up to and including 12 months), and (3) spot sales basis (for a single delivery)?

<u>Type of sale</u>	<u>Total share of sales for industrial applications (percent)</u>	<u>Total share of sales for plumbing applications (percent)</u>	<u>Total share of sales (percent)</u>
Long-term contracts	_____	_____	_____
Short-term contracts	_____	_____	_____
Spot sales	_____	_____	_____

IV-7. **Long-term contract provisions.**--If you sell on a long-term contract basis, please answer the following questions with respect to provisions of a typical long-term contract.

- (a) What is the average duration of a contract? _____
- (b) Can prices be renegotiated during the contract period? Yes No
- (c) Does the contract fix quantity, price, or both? Quantity Price Both
- (d) Does the contract have metal costs that are based on a particular benchmark?
 - No benchmark Plumbing applications Industrial applications
 - Both plumbing and industrial applications
- (e) Please specify metal cost benchmark(s): _____
- (f) Does the contract have a meet-or-release provision? Yes No

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

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

- (a) What is the average duration of a contract? _____
- (b) Can prices be renegotiated during the contract period? Yes No
- (c) Does the contract fix quantity, price, or both? Quantity Price Both
- (d) Does the contract have metal costs that are based on a particular benchmark?
 No benchmark Plumbing applications Industrial applications
 Both plumbing and industrial applications
- (e) Please specify metal cost benchmark(s): _____
- (f) Does the contract have a meet-or-release provision? Yes No

IV-9. **Lead times.**--What is your share of sales both from inventory and produced to order and what is the average lead time between a customer's order and the date of delivery for your firm's sales of your U.S.-produced seamless refined copper pipe and tube?

<u>Source</u>	<u>Share of sales in 2009</u>	<u>Lead time</u>
From inventory	_____	_____
Produced to order	_____	_____
Total	100 %	

IV-10. **Shipping information.**--

- (a) What is the approximate percentage of the total delivered cost of seamless refined copper pipe and tube that is accounted for by U.S. inland transportation costs? _____ percent.
- (b) Who generally arranges the transportation to your customers' locations? (check one)
 Your firm or purchaser
- (c) What proportion of your sales are delivered within 100 miles of your production facility? _____ percent. Within 101 to 1,000 miles? _____ percent. Over 1,000 miles? _____ percent.

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

IV-11. **Geographical shipments.**-- What is the geographic market area in the United States served by your firm's shipments of seamless refined copper pipe and tube? (check all that apply)

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

IV-12. **End uses.**--List the top 3 end uses for which the seamless refined copper pipe and tube your firm produces is used, the percentage of your production of seamless refined copper pipe and tube accounted for by each end use, and the percentage of the total cost of the end use that is accounted for by seamless refined copper pipe and tube.

End uses	Share of your production of seamless refined copper pipe and tube that is used in this end use (<i>percent</i>)	Share of cost of this product accounted for by seamless refined copper pipe and tube (<i>percent</i>)
1.		
2.		
3.		

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

IV-13. **Substitutes.**--Please list in order of importance any products that may be substituted for seamless refined copper pipe and tube (ex. plastic tube (such as PEX or PVC), aluminum tube, and stainless steel tube). For each possible substitute product, please describe the degree of substitutability and indicate whether changes in the price of the substitute affect the price for seamless refined copper pipe and tube, and to what degree, the length of any time lag of such an effect.

Substitute	Application	Have changes in the prices of this substitute affected the price for seamless refined copper pipe and tube?
1.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
2.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
3.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
4.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>
5.		<input type="checkbox"/> No <input type="checkbox"/> Yes--Please explain. <hr/> <hr/>

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

IV-14. Demand trends.--

- (a) How has the demand within the United States for seamless refined copper pipe and tube changed since January 1, 2007? What principal factors (such as substitution to and from other products, changes in regulations, etc.) affect changes in demand?

Increased No Change Decreased Fluctuated

- (b) How has the demand outside the United States (if known) for seamless refined copper pipe and tube changed since January 1, 2007? What principal factors (such as substitution to and from other products, changes in regulations, etc.) affect changes in demand?

Increased No Change Decreased Fluctuated

- IV-15. Product changes.--**Have there been any significant changes in the product range, product mix, or marketing (including sales over the internet) of seamless refined copper pipe and tube since 2007?

No Yes--Please describe and quantify if possible.

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

IV-16. **Business cycles.**--

(a) Is seamless refined copper pipe and tube market subject to business cycles or conditions of competition (including seasonal business) distinctive to seamless refined copper pipe and tube?

No (skip to question IV-17.) Yes-- Please describe below and then answer part (b).

(b) If yes, have there been any changes in the business cycles or conditions of competition for seamless refined copper pipe and tube since January 1, 2007?

No Yes-- Please describe.

IV-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply seamless refined copper pipe and tube since January 1, 2007 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, been unable to meet timely shipment commitments, being unable to supply product due to patent constraints etc.)?

No Yes-- Please describe.

IV-18. **Raw materials.**--Please describe any trends in the prices of raw materials used to produce seamless refined copper pipe and tube and whether your firm expects these trends to continue.

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

IV-19. **Interchangeability.**--Is seamless refined copper pipe and tube produced in the United States and in other countries interchangeable (*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.¹

Country-pair	China	Mexico	Canada	Malaysia	Other countries
United States					
China					
Mexico					
Canada					
Malaysia					

¹ For any country-pair producing seamless refined copper pipe and tube which is *sometimes* or *never* interchangeable, please explain the factors that limit or preclude interchangeable use:

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

IV-20. **Factors other than price.**--Are differences other than price (*i.e.*, quality, availability, transportation network, product range, technical support, *etc.*) between seamless refined copper pipe and tube produced in the United States and in other countries a significant factor in your firm's sales of the 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.¹

Country-pair	China	Mexico	Canada	Malaysia	Other countries
United States					
China					
Mexico					
Canada					
Malaysia					

¹ For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of seamless refined copper pipe and tube, identify the country-pair and report the advantages or disadvantages imparted by such factors:

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

IV-21. **Customer Identification**--Please identify below the names and addresses of your firm's 10 largest customers for seamless refined copper pipe and tube during 2007-2009. Please also provide the name and telephone number of a contact person and the share of the quantity of your firm's total shipments of seamless refined copper pipe and tube that each of these customers accounted for in 2009.

No.	Customer's name	Street address (not P.O. box), city, state, and zip code	Contact person	Area code and telephone number	Share of 2009 sales (%)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

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

IV-23. **COMPETITION FROM IMPORTS--LOST SALES.** --THIS SECTION IS TO BE COMPLETED ONLY BY NON-PETITIONERS. (Note: petitioners may provide allegations involving quotes made AFTER the filing of the petition.) **PLEASE DO NOT RE-SUBMIT ALLEGATIONS PROVIDED IN THE PRELIMINARY PHASE OF THIS INVESTIGATION.**

Since January 1, 2007: Did your firm lose sales of seamless refined copper pipe and tube to imports of these products from **China and Mexico**?

No Yes

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

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

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

PART V.-- ALTERNATIVE PRODUCTS--TRADE AND RELATED INFORMATION

V-1. **COMPARABILITY OF INDUSTRIAL AND PLUMBING SEAMLESS REFINED COPPER PIPE AND TUBE.**

(a) Do industrial and plumbing seamless refined copper pipe and tube have the same physical characteristics and end uses?

No Yes

Please describe the similarities and/or differences between the physical characteristics or end uses.

(b) Are industrial and plumbing seamless refined copper pipe and tube interchangeable?

No Yes

Please describe what makes these two products interchangeable or not interchangeable.

(c) Are the manufacturing processes to produce industrial seamless refined copper pipe and tube similar to those to produce plumbing seamless refined copper pipe and tube?

No Yes

Please describe the similarities and/or differences between the two manufacturing processes.

(d) Do industrial and plumbing seamless refined copper pipe and tube share the same channels of distribution?

No Yes

Please describe the similarities and/or differences between the channels of distribution.

(e) Do you or your customers perceive industrial seamless refined copper pipe and tube and plumbing seamless refined copper pipe and tube to be similar products?

Yes No, please describe the perceived differences between the two products:

PART V.-- ALTERNATIVE PRODUCTS--TRADE AND RELATED INFORMATION--*Continued*

(f) Are there generally differences in price between industrial and plumbing seamless refined copper pipe and tube?

No

Yes, industrial seamless refined copper pipe and tube are generally higher in price than plumbing seamless refined copper pipe and tube.

Yes, plumbing seamless refined copper pipe and tube are generally higher in price than industrial seamless refined copper pipe and tube.

Please explain:

PART V.-- ALTERNATIVE PRODUCTS--TRADE AND RELATED INFORMATION--Continued

V-2. **Industrial** seamless refined copper pipe and tube.-- For the **industrial** seamless refined copper pipe and tube operations of your U.S. establishment(s), report the information requested below.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar years			January-June	
	2007	2008	2009	2009	2010
AVERAGE PRODUCTION CAPACITY (quantity)					
BEGINNING-OF-PERIOD INVENTORIES (quantity)					
PRODUCTION (quantity)					
U.S. SHIPMENTS					
Commercial shipments:					
Quantity of commercial shipments					
Value of commercial shipments					
Internal Consumption:					
Quantity of internal consumption					
Value ¹ of internal consumption					
Transfers to related firms:					
Quantity of transfers to related firms					
Value ¹ of transfers to related firms					
EXPORT SHIPMENTS:²					
Quantity of export shipments					
Value of export shipments					
END-OF-PERIOD INVENTORIES³ (quantity)					
CHANNELS OF DISTRIBUTION:					
U.S. shipments to distributors (quantity)					
U.S. shipments to end users (quantity)					
HOURS WORKED BY PRWs (1,000 hours)					
WAGES PAID TO PRWs (value)					
FINANCIAL INFORMATION:⁴					
Net sales:⁵					
Quantity					
Value					
Cost of goods sold (value)					
Gross profit or (loss) (value)					
Selling, general, and administrative expenses (value)					
Operating income or (loss) (value)					
Capital expenditures (value)					
¹ Sales to related firms (including internal consumption and transfers) must be valued at fair market value. 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 above reconcile? <input type="checkbox"/> Yes <input type="checkbox"/> No--Please explain: _____ ⁴ Report financial information on a fiscal-year basis (year ending _____). ⁵ Including internal consumption and transfer to related firms and net of discounts, returns, allowances, and prepaid freight.					

PART V.-- ALTERNATIVE PRODUCTS--TRADE AND RELATED INFORMATION--Continued

V-3. **Plumbing** seamless refined copper pipe and tube.-- For the **plumbing** seamless refined copper pipe and tube operations of your U.S. establishment(s), report the information requested below.

Item	Quantity (in 1,000 pounds) and value (in \$1,000)				
	Calendar years			January-June	
	2007	2008	2009	2009	2010
AVERAGE PRODUCTION CAPACITY (quantity)					
BEGINNING-OF-PERIOD INVENTORIES (quantity)					
PRODUCTION (quantity)					
U.S. SHIPMENTS					
Commercial shipments:					
Quantity of commercial shipments					
Value of commercial shipments					
Internal Consumption:					
Quantity of internal consumption					
Value ¹ of internal consumption					
Transfers to related firms:					
Quantity of transfers to related firms					
Value ¹ of transfers to related firms					
EXPORT SHIPMENTS:²					
Quantity of export shipments					
Value of export shipments					
END-OF-PERIOD INVENTORIES³ (quantity)					
CHANNELS OF DISTRIBUTION:					
U.S. shipments to distributors (quantity)					
U.S. shipments to end users (quantity)					
HOURS WORKED BY PRWs (1,000 hours)					
WAGES PAID TO PRWs (value)					
FINANCIAL INFORMATION:⁴					
Net sales:⁵					
Quantity					
Value					
Cost of goods sold (value)					
Gross profit or (loss) (value)					
Selling, general, and administrative expenses (value)					
Operating income or (loss) (value)					
Capital expenditures (value)					
¹ Sales to related firms (including internal consumption and transfers) must be valued at fair market value. 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 above reconcile? <input type="checkbox"/> Yes <input type="checkbox"/> No--Please explain: _____ ⁴ Report financial information on a fiscal-year basis (year ending _____). ⁵ Including internal consumption and transfer to related firms and net of discounts, returns, allowances, and prepaid freight.					