



## EXPORTER REQUEST FOR INFORMATION - DUMPING

under the

*Special Import Measures Act*

concerning Canada's dumping investigation of

### **CERTAIN OIL COUNTRY TUBULAR GOODS ORIGINATING IN OR EXPORTED FROM CHINESE TAIPEI, THE REPUBLIC OF INDIA, THE REPUBLIC OF INDONESIA, THE REPUBLIC OF THE PHILIPPINES, THE REPUBLIC OF KOREA, THE KINGDOM OF THAILAND, THE REPUBLIC OF TURKEY, UKRAINE AND THE SOCIALIST REPUBLIC OF VIETNAM.**

***RELEVANT  
DATES***

The Canada Border Services Agency (CBSA) requires sales and costing information on all subject goods **imported** into Canada during the period of **January 1, 2013 to March 31, 2014**, inclusive (15 months). The CBSA refers to this as the **Period of Investigation (POI)**.

The CBSA also requires domestic sales and costing information for goods sold during the period **October 1, 2012 to March 31, 2014**, inclusive (18 months). The CBSA refers to this as the **Profitability Analysis Period (PAP)**.

***DUE DATE FOR  
RESPONSE***

Your complete response to this Request for Information is due **August 27, 2014**.

***RETURN YOUR  
RESPONSE TO***

Canada Border Services Agency  
Trade and Anti-dumping Programs Directorate  
SIMA Registry and Disclosure Unit  
100 Metcalfe Street, 11<sup>th</sup> Floor  
Ottawa, Ontario, Canada  
K1A 0L8

***FOR FURTHER  
INFORMATION***

Contact one of the following officers as follows:

Barbara Chouinard 613-954-7399 [barbara.chouinard@cbsa-asfc.gc.ca](mailto:barbara.chouinard@cbsa-asfc.gc.ca)  
Andrew Manera 613-946-2052 [andrew.manera@cbsa-asfc.gc.ca](mailto:andrew.manera@cbsa-asfc.gc.ca)

#### ***IMPORTANT NOTE***

**Information provided is deemed to be public (non-confidential) unless clearly marked confidential. Refer to “Confidential and Non-confidential Information” in the Instructions section for further information.**

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## INSTRUCTIONS

Note that *bold and italicized* terms are defined in the Glossary in Part E of this document.

### Definition of Goods Subject to this Investigation

*Subject goods* are defined as:

“Oil country tubular goods, which are casing, tubing and green tubes made of carbon or alloy steel, welded or seamless, heat-treated or not heat-treated, regardless of end finish, having an outside diameter from 2 ¾ inches to 13 ¾ inches (60.3 mm to 339.7 mm), meeting or supplied to meet American Petroleum Institute specification 5CT or equivalent and/or enhanced proprietary standards, in all grades, excluding drill pipe, pup joints, couplings, coupling stock and stainless steel casing, tubing or green tubes containing 10.5 percent or more by weight of chromium, originating in or exported from Chinese Taipei, the Republic of India, the Republic of Indonesia, the Republic of the Philippines, the Republic of Korea, the Kingdom of Thailand, the Republic of Turkey, Ukraine and the Socialist Republic of Vietnam.”

*Like goods* are goods that are *identical* or *similar* to the subject goods and are sold in the exporter’s domestic market. Identical goods are goods that are identical in all respects to the subject goods exported to Canada by having all the characteristics used to identify a model. For this investigation, a good is identical when it has the same following seven characteristics:

1. Product Type
2. Grade
3. Outside Diameter
4. Gauge (nominal weight)
5. End Finish
6. Length (Range 1, 2 or 3)
7. Value added coatings (i.e. corrosion or wear protection)

A domestic good considered closely resembling or “similar” would generally meet several of the characteristics listed above, with consideration given to whether a domestic product has a comparative usefulness to the exported subject good in its application. As such, a similar good would normally have the same first characteristic as the subject good, such that tubing is matched with tubing and casing with casing. Some grades and outside diameters may also be considered similar where no significant distinction in use or cost is established. Alternatively, if the subject goods shipped to Canada have a value-added coating or a premium connection end finish, then these characteristics should typically be reflected in any like good identified as similar. Respondents are asked to explain the characteristics considered in establishing similar goods in Question C9 of this RFI and to make appropriate matches in **Appendix 2**. See also the Glossary in **Part E** for further clarifications on product characteristics.

## Additional Product Information

For greater certainty, the product definition notes the inclusion of intermediate or in-process tubing and casing referred to commonly in the oil country tubular goods (OCTG) industry as “green tube,” which require additional processing, such as threading, heat treatment or testing, before they can be used as fully finished oil and gas well casing or tubing in end-use applications.

Pup joints, which are essentially short lengths of OCTG used for spacing in a drill string, are excluded where their length is below 12 feet (plus or minus acceptable tolerances), as defined in the API 5CT specification.

The product definition also includes non-prime and secondary OCTG (limited service pipes).

## Classification of Imports

The goods subject to the product definition are usually classified under the following 22 10-digit Harmonized System classification numbers (*Customs Tariff* – 2014):

7304.29.00.11	7304.29.00.69
7304.29.00.19	7304.29.00.71
7304.29.00.21	7304.29.00.79
7304.29.00.29	7306.29.00.11
7304.29.00.31	7306.29.00.19
7304.29.00.39	7306.29.00.21
7304.29.00.41	7306.29.00.29
7304.29.00.49	7306.29.00.31
7304.29.00.51	7306.29.00.39
7304.29.00.59	7306.29.00.41
7304.29.00.61	7306.29.00.49

The subject goods, particularly in the form of green tubes, may also be imported under the following 7 tariff codes (*Customs Tariff* – 2014):

7304.39.00.10	7306.50.00.90
7304.59.00.10	7306.90.00.10
7306.30.00.29	7306.90.00.20
7306.30.00.39	

This listing of HS codes is for convenience of reference only. Refer to the product definition for authoritative details regarding the subject goods.

## Purpose of the Request for Information (RFI)

Note that ***bold and italicized*** terms are also defined in the Glossary in **Part E** of this RFI.

1. The Canada Border Services Agency (CBSA) sent your company this RFI, as your company has been identified as a potential exporter and/or manufacturer of the ***subject goods***.

2. This RFI specifies the information and documents required from your company for the purpose of this investigation. The CBSA will use the information to determine *normal values* and *export prices* of subject goods in accordance with the provisions of the *Special Import Measures Act* (SIMA). If you fully respond to the RFI, any provisional duties applicable as a result of a preliminary determination of dumping will be based on an estimated margin of dumping calculated for your company. If you decide not to provide the information or submit an incomplete response, provisional duty will be based on the highest estimated margin of dumping found during the investigation.
3. In order to determine the export prices and, where necessary, to construct cost-based normal values for the exported goods, the CBSA requires detailed sales and costing information concerning the subject goods exported to Canada during the POI of **January 1, 2013 to March 31, 2014**.
4. In order to determine the normal values of the goods, the CBSA requires detailed sales and costing information concerning your sales of like goods made in your domestic market during the *Profitability Analysis Period* of **October 1, 2012 to March 31, 2014** (PAP). The sales and costing information is required to permit a detailed profitability analysis of your domestic sales. The results of the analysis will determine which sales may be used in the determination of normal values for subject goods imported into Canada during the POI.

## **Confidential and Non-Confidential Information**

5. **Part F** of the questionnaire describes the treatment of confidential and non-confidential information submitted to the CBSA in connection with proceedings under SIMA. A submission without a non-confidential version is considered an incomplete response.

## **Format of Information Submitted**

6. Your response to the RFI should be provided in electronic documents on CDs or DVDs. Due to CBSA e-mail size restrictions, e-mailed submissions cannot be accepted. Please label all electronic media, describing the contents and confidential or non-confidential designation.

Please label all disks as follows: confidential or non-confidential, company name, date, and “**CBSA OCTG II 4214-43**”. Please ensure that confidential and non-confidential versions of responses are provided on separate disks. Where multiple discs are provided, please also indicate the material contained on the disc and its order in the disc sequence (i.e., Parts A and B, disc 1 of 3). You can submit files in a compressed format using WinZip version 14.5 or compatible. If you send us information in a compressed format, provide a list of all of the electronic files you are submitting. Include the file name, file type, number of records and the RFI request number that the file answers.

7. You may also provide hard copies of your response. If you do so, provide an original plus one printed copy of your confidential submission, and one copy of your edited non-confidential version for a total of three hard copies.

Hard copy submissions should also:

- Not be stapled or bound (pages should be held together by clips or elastics);
  - Be numbered consecutively from start to finish, including appendices and attachments;
  - Be provided on 8 1/2" x 11" paper. If possible, please reduce any oversized documents to fit this paper size.
8. Narrative or text responses must be provided in Microsoft Word compatible format. Spreadsheets or data responses must be provided electronically in Microsoft Excel compatible format and **must retain any formulas used in calculations**. Copies of supporting documentation may be provided in Adobe PDF format.
  9. Your response must state each numbered question followed by a complete response. If a question does not apply to the organization you represent or requests information in a format that is different than that in which it is maintained, an explanation as to why the question does not apply or how the information was adjusted to respond to the question is required. Consequently, in many instances, "Not Applicable" or an answer that only refers to an exhibit or an attachment will not provide the CBSA with a clear explanation of the existing situation and will be considered an incomplete response.
  10. Your response must be in either English or French. Any source material that you provide must be in the document's original language and must be accompanied by a translation in either English or French.
  11. Submissions in electronic documents must be numbered consecutively by page from start to finish, including appendices and attachments.
  12. Except where otherwise noted, all information is requested on a calendar year basis. Where adjustments are required to comply with our request, please identify the adjustments and give a full explanation of how they were made.

## **Due Date for Response**

13. Late responses may not be considered for purposes of this investigation. Therefore, the CBSA must receive your response no later than the due date shown on the covering page of this RFI (**August 27, 2014**). If your company does not fully respond to this RFI, normal values will be determined by *Ministerial Specification*, as is explained in the covering letter accompanying this RFI.

## **Verification Meetings**

14. A complete response, including all of the documentation requested, must be submitted to the CBSA before a verification meeting will be considered.
15. It is common practice for CBSA officers to visit exporter(s) and the manufacturer(s) of the subject goods in order to verify the information submitted. You will be contacted in advance of such a meeting to make arrangements as to the time and place of the

verification meeting. Officers may wish to visit any location that has relevant data, such as your head office, sales office, factory locations, warehouses and any other location considered necessary by the CBSA.

16. If the verification meeting is delayed or cancelled due to the unavailability of company officials to meet with CBSA officers, normal values of the subject goods exported by your company may be based on the facts available.
17. The purpose of the verification meeting is to verify information already provided to the CBSA in your submission prior to the meeting. It is not intended to be a second opportunity for your company to provide new or additional information. Accordingly, the original response should be complete and accurate.
18. During any verification meeting with the CBSA, each company official who prepared any part of the response and who has knowledge of the source documentation and the information contained therein must be available to meet with CBSA officers and to provide additional clarification and explanations, as required.
19. To satisfy itself as to the integrity, completeness and accuracy of the information supplied, the CBSA may examine sales, costing and other information in respect of other goods not specifically included in the product definition for this investigation. For example, the CBSA may require information on a product not covered by this investigation in order to validate costing allocations that were made in respect of the goods being reviewed.
20. During the verification meeting, your company should be in a position to promptly retrieve requested documents and to provide photocopies of such documents when requested by the officers. During the meeting, your company will also be required to provide a non-confidential version of each document requested by CBSA officers.
21. Although the information requested relates largely to the time periods specified in the RFI, it should be noted that the CBSA is not limited to the examination of information within these time frames. Information may be requested for periods outside the POI or the PAP in order that the CBSA may satisfy itself as to the accuracy of the data presented for the periods of time that have been specified in the RFI. For example, current pension costs may include a portion of pension costs incurred in several previous accounting periods, but permitted to be matched against future revenues because of legislation or accounting standards. In such circumstances, the CBSA will request information to support the current pension charges outside of both the period of investigation and the profitability analysis period.

## **Source Documents**

22. Source documents should be kept easily accessible at your business location for possible review during the verification meeting.

## Failure to Cooperate

23. Failure to submit all required information and documentation, including non-confidential versions, or failure to permit verification of any information, will result in the normal values of the subject goods exported by your company being based on the facts available. Such a decision will be less favourable to your company than if full and verifiable information is made available.

## Requirements of Respondent

24. Your company should fit into one of the following 3 categories. As a general guideline, the exporter for SIMA purposes is the person or company who is a principal in the transaction, located in the country of export at the point of direct shipment to Canada who gave up responsibility for the goods by knowingly placing them in the hands of a carrier, courier, forwarding company, their own truck or other conveyance, etc., for delivery to Canada. It should also be understood that in cases where a vendor acts as an intermediary between the manufacturer and the Canadian importer, it is quite possible that the manufacturer will be held to be the exporter for SIMA purposes.

If there is any doubt in relation to the particulars of your own situation, please contact one of the officers on the cover page of this RFI.

**CATEGORY 1:      An exporter of the subject goods to Canada who is also the manufacturer of the goods.**

- ◆ A respondent in this category should respond to all parts of the RFI.

**CATEGORY 2:      An exporter or vendor of the subject goods to Canada who is not the manufacturer of the goods. (i.e. distributor, trading company, etc.)**

- ◆ A respondent in this category must respond to all parts of the RFI. You may conclude that certain questions do not apply to your company. You must nevertheless respond to each such question by explaining clearly why it does not apply. Trading companies and distributors responsible for export sales only should pay particular attention to the request in question D21 for information relating to the purchase price paid to the supplier of the exported goods and to other details requested concerning the acquisition cost of the goods.

At the same time, you must **IMMEDIATELY** forward a copy of this RFI (questionnaire) to each of the manufacturers concerned and inform an officer identified on the covering page of this RFI of the name, address, telephone and fax number of the contact person of each manufacturer. You should make every effort to ensure that the manufacturer(s) provide(s) the required information directly to the CBSA by the due date indicated on the covering page. Where the manufacturer (i.e. your supplier) fails to provide the required information, your submission will not be considered incomplete provided that you have submitted all of the requested information that is within your own ability to provide. The CBSA will use other information in place of the information not provided by the manufacturer/producer. This may result in a decision less favourable to your company



than if the producer of the goods had provided full information. (Category 3 provides instructions on the response requirements for a manufacturer that is not the exporter.)

If your company is a distributor (i.e., an exporter but not a manufacturer) the term "factory" or "production facilities" may be read as "distributor" and the term "produce" may be read as "sell" throughout this document.

**CATEGORY 3:     **A manufacturer of the subject goods that were subsequently exported to Canada by another party. (i.e., distributor, trading company, etc.)****

- ◆ A respondent in this category must respond to Parts A, D, G and H of the RFI. If the party responsible for exporting the goods to Canada does not, at the same time, also sell like goods in your domestic market (i.e., sales of the like goods in the domestic market are negotiated and completed by the manufacturer), then the manufacturer must also respond to Part C of the RFI.

## **Results of Investigation & Disclosure Meetings**

25. The results of the investigation, including an explanation of the methodologies for determining the normal values and export prices, will be provided to your company upon completion of the investigation. Should you wish to discuss the results and the decisions taken, CBSA officers will be available to meet with you or your representatives in Ottawa, Canada.

## **Establishing Contact with the CBSA**

26. You are requested to contact a CBSA officer indicated on the covering page of this RFI as soon as possible following the receipt of this request, by telephone or via e-mail, to indicate whether your company will be responding to the RFI and if so, your company's contact person. If applicable, indicate the name and telephone number of the counsel that will be representing your company during this investigation. At the same time, you are encouraged to raise any questions you may have and seek any explanations necessary to assist you in completing your submission.

## **Counsel**

27. If your company has retained counsel to represent you in this matter before the CBSA, a letter of authorization must be provided. When such letter of authorization is provided, the CBSA will, upon request, undertake to provide copies of all outgoing correspondence with your company to designated counsel. Furthermore, if it is your wish that confidential materials relating to your company be released to or discussed with your counsel, the letter should specifically authorize the CBSA to do so. In such circumstances, the letter of authorization will serve as the CBSA's authority to release confidential materials to your counsel such as calculation spreadsheets, or to discuss the particulars of your file. Please note that the CBSA is not in a position to either discuss the particulars of your file or to provide copies of any materials contained in the file to designated counsel unless the letter of authorization has been provided.

## PART A - General Information

The information requested in this part will provide the CBSA with an overview of your corporate organization, the goods you may produce and/or sell, and your domestic and export markets. It will also facilitate planning, scheduling and conducting the verification meeting at your company.

- A1.** Provide your company's complete name and mailing address, telephone and fax numbers, and e-mail address. In addition, provide the name and position of the officer in your company responsible for your response to the RFI along with this person's telephone number, fax number and e-mail address.
- A2.** Describe the nature of your company's business. Explain whether you are a manufacturer, trading/sales organization, distributor, etc. and provide a brief history of your company.
- A3.** Indicate whether you are replying to the RFI as a Category 1, 2 or 3 respondent (refer to #24 in the Instructions). Explain why you have classified yourself in the category selected.
- A4.** Indicate if your company is a sole proprietorship, a partnership, a limited liability company, or another type of corporate organization and provide information on whether it is privately held, a public corporation, a government agency, etc.
- A5.** Provide a chart showing all *associated companies* in order to provide an understanding of your company's place in the larger corporate structure.
- A6.** Provide a list of all associated companies (associates) with addresses, telephone numbers, telefax numbers and contact names. Clearly indicate the relationship between your company and each of its associates and the percentage of ownership held by your company and/or its associates. For each company, explain the nature of the business performed and the responsibilities or functions carried out by each associated company in respect of the goods shipped to Canada.
- A7.** Describe your company's internal organization and provide a complete internal organization chart. For each functional, divisional, or other grouping depending on your particular circumstances, provide a description of the grouping and the activities performed within the grouping.
- A8.** Provide a list, including the names and addresses of your company's 15 largest shareholders and the percentage of shares that each of them holds. If not already covered, identify the names and addresses of any shareholder that owns more than five per cent of the shares of your company.
- A9.** If your company is a subsidiary of another company, list the 15 largest shareholders of your parent company, including their names and addresses. If not already covered, identify the name and address of any shareholder that owns more than five per cent of the shares of your parent company.

- A10.** Provide the details of any changes in the majority ownership structure of your company for the last two years. Include details of any ownership change that has affected your costing, selling, pricing, and distribution practices during the same period.
- A11.** For the last two years, indicate if your company has been in receivership, has operated under any bankruptcy proceedings, has received protection from creditors, or in any other manner has been involved with bankruptcy proceedings as provided for in your domestic legislation. Provide full details of any such occurrences, including any proceedings that might currently be underway.
- A12.** For the last two years, indicate if your company has been involved in any significant legal proceedings. Provide full details of any such occurrences, including any proceedings that are expected or are currently underway.
- A13.** Provide the address of each of your production facilities or factories that are capable of producing the subject goods. Identify each of your production facilities or factories where the subject goods imported into Canada during the POI were produced. Indicate the location where the relevant sales data and costing data are kept in respect of your domestic sales and your shipments to Canada.
- A14.** (a) Provide a list of all product lines produced by your company (i.e., all goods produced including all goods that match the description of the goods under investigation).
- (b) For all goods produced by your company that match the description of the goods under investigation, complete the following chart, on a factory basis, for the POI.

<b>Market</b>	<b>Total Quantity (in metric tonnes)</b>	<b>Total Value (indicate currency)</b>
<b>Domestic Sales</b>		
<b>Exports to Canada</b>		
<b>All Other Exports</b>		
<b>Total</b>		

- (c) Do your domestic sales of goods that match the description of the goods under investigation include any models your company imported from another country? If yes, provide the quantity and value.
- A15.** With respect to subject goods sold to Canada and like goods sold in your domestic market, provide details of the terms of *sale* that apply and explain fully how each term is defined by your company:
- (a) delivery (e.g. F.O.B., ex-factory, C.I.F., delivered, etc.);
- (b) payment (e.g. 2% 10 net 30 days, 60 days after bill of lading, etc.); and
- (c) method of payment (e.g. cash or money order, letter of credit, bank transfer, etc.).

- A16.** With respect to subject goods sold to Canada and like goods sold in your domestic market, is it your corporate practice to *discount your accounts receivable*? If it is, identify the methods of discounting used, the cost to your company and the timing associated with the discounting of the payment instrument.
- A17.** Provide a copy of the latest brochures, corporate publications, or any other such general literature concerning your company, its associates and products sold or manufactured both in your domestic market and in export markets.

**REMINDERS:**

- 1. Any source material that you provide with your response must be in the original language and must be accompanied by a translation in either English or French.**
- 2. If your company is not the producer of the goods, it is your responsibility and in your own interest to ensure that the producer(s) provide(s) the CBSA with the necessary information as outlined in #24 of the Instructions.**
- 3. If you have designated any information confidential, a non-confidential version of that information must accompany your response to this RFI. See Part F for further details in this regard.**

## PART B - Export Information

This part of the RFI requests information concerning your exports to Canada. This information is required to determine your export practices and the export price of those goods imported into Canada during the POI (from January 1, 2013 to March 31, 2014). It is recognized that you may not be in a position to know exactly when the goods shipped were actually imported into Canada. You may wish to contact the importer directly to confirm import dates respecting your sales or provide export sales information for shipments made well in advance of possible importation.

- B1.** For each of your customers in Canada that imported subject goods during the POI, provide the following:
- (a) name;
  - (b) customer code;
  - (c) address;
  - (d) telephone number;
  - (e) fax number;
  - (f) name of the contact person;
  - (g) *trade level*;
  - (h) total quantity of each *model* of subject goods shipped to that importer (provide unit of measure);
  - (i) total transaction value of each model shipped to that importer; and
  - (j) full list price (base book price plus applicable extras) for each model shipped.
- B2.** For each importer identified in response to question B1, indicate:
- (a) the activities which the importer undertakes in respect of the subject goods before and after importation;
  - (b) the sales activities that your company or any associate performs on sales to the importer in Canada;
  - (c) the sales activities that your company or any associate performs on behalf of the importer in Canada;
  - (d) the relationship between your company and your Canadian customer. If your company is *related* to the importer, elaborate; and
  - (e) the details of any arrangements, financial or otherwise, in existence between your company and the importer in Canada of the subject goods.
- B3.** Provide a detailed explanation of your company's channels of distribution to the ultimate destination in Canada. Include a flow chart explaining the movement of the goods from the manufacturing plant to the delivery of the goods to the importer in Canada and to the ultimate destination in Canada. Explain in detail any agency or distributor agreements and provide copies of each agreement. At each step of the process, describe the functions or activities performed by the respective parties (i.e., manufacturer, agent, importer, consignee, etc.) and indicate who owns the goods at each stage of their movement.

- B4.** Explain in detail the order process used by your company with respect to your exports to Canada from the point of the purchase order, through to delivery and payment for the goods. Identify and describe fully the documentation used in each step of the process. Indicate the terms and conditions of sale, including the payment and shipping terms.
- B5.** Identify any party receiving a commission on subject goods sold to the importers in Canada during the POI (from **January 1, 2013 to March 31, 2014**). Explain the relationship between your company and the party receiving the commission. Provide the following:
- (a) activities performed for which the commission was paid;
  - (b) nature of the commission;
  - (c) amount of the commission;
  - (d) basis for calculating the commission;
  - (e) method of payment;
  - (f) currency of payment;
  - (g) timing of payment; and
  - (h) other relevant details.
- B6.** The CBSA considers the *date of sale* to be the date that the parties establish the material terms of the sale. The date of the order confirmation is usually considered the date of sale although the date of sale could be the contract, purchase order or invoice date, or such other date which establishes the material terms of sale. If any of the terms of sale are subsequently revised, the date that the revision was made is usually considered the date of sale.
- (a) For your export sales to Canada, at what stage in the process (e.g. contract date, purchase order date) are the material terms of the sale established? In other words, what do you consider is the date of sale? Explain.
  - (b) If different methods are used to identify the dates of sale for different transactions, (e.g. spot sales and short-term and long-term contracts), explain what you consider to be the date of sale for each type of transaction and explain why different methods are used.
  - (c) For your export sales to Canada, under what circumstances can terms of sale changed?
- B7.** **Appendix 1** provides the format to be used when responding to this question. This information must also be provided in electronic format. Refer to #8 in the Instructions section of this RFI for guidelines respecting the submission of information in electronic format.

Provide a list of all shipments of subject goods that were exported to Canada during the POI. For each shipment, provide a separate line on the spreadsheet for every individual model (based on the characteristics as outlined in the explanation to **Appendix 1**) included in that shipment. For each line, provide the information required for each column indicated in **Appendix 1**.

**IMPORTANT NOTE:** Product descriptions, which are to be provided for all worksheets (**Appendix 1 to 4**), must be consistent when describing the same model and include the period of production, as electronic comparisons and manipulations will be made in analyzing the data. For example, if a domestic model is listed in **Appendix 2** (selection of like goods), this model must be described in exactly the same way and also include the period of production in **Appendix 3** (listings of domestic sales), **Appendix 4** (listings of total cost of goods). This also applies to **Appendix 1** (exports to Canada.) Please note that question B10 of this RFI asks for an explanation of product/model codes if used.

- B8.** In **Appendix 1**, there is a column titled "*Other Discounts*". For each type of "Other Discount" you offer, add an extra column to your response to question B7 and indicate the type of discount in the space for the column name. Insert, line-by-line, the amount of the discount granted on each individual model in each shipment to Canada.

Describe each type of discount you offer, including the terminology associated with the discount and the terms and conditions that must be met by the importer in order to receive the discount.

- B9.** In **Appendix 1**, there is a column titled "*Rebates and Allowances*". For each type of rebate and/or allowance you offer, add an extra column to your response to question B7 and indicate the type of rebate or allowance in the space for the column name. Insert, line-by-line, the amount of the rebate granted on each individual model in each shipment to Canada.

Describe each type of rebate or allowance you offer, including the terminology associated with the rebate or allowance and the terms and conditions that must be met by the importer to receive the rebate or allowance.

If your company has any agreements with the importer respecting the payment of rebates and/or allowances, provide a copy of each agreement. If rebates and/or allowances are owed but have not yet been paid on shipments to Canada, provide the total amount and explain how you determined the amount of the rebate or allowance reported in your response to B7.

- B10.** Provide copies of any catalogues, brochures, price lists, discount schedules, etc., relative to your shipments to Canada. Explain any product/model codes or other codes used by your company on any documents submitted so as to permit a full understanding by CBSA.
- B11.** If the goods listed in response to question B7 conform to any government, association, international or other standard or specification, provide copies of the relevant standards or specifications.

**B12.** For each line listed in response to question B7, if there are any costs, charges or expenses incurred in respect of the goods by or on behalf of your company which are not already identified in a separate column heading on **Appendix 1**, add a column to your response for each item and indicate the amount of the item for each individual model in the shipment. The column names should clearly identify the nature of the cost, charge or expense. These costs, charges or expenses should relate to:

- (a) preparing the goods for shipment that are additional to those costs, charges or expenses incurred on domestic sales of like goods in the country of export, including additional *packing costs* for export;
- (b) the payment or future payment by you (or on your behalf) of any Canadian regular or special duties and taxes; and
- (c) all other costs, charges and expenses resulting from the exportation of the goods, or arising from their shipment to Canada.

Provide a narrative description of the cost, charge or expense for each column you add to **Appendix 1**. This description must be sufficiently detailed to permit a proper understanding by the CBSA.

- B13.**
- (a) If any applicable domestic commodity tax, value-added tax (VAT) or any other domestic tax is included in the export selling price, and the amount of tax is not fully refundable upon export, the amount of the tax should be indicated in the Column titled “**Taxes**” in **Appendix 1**.
  - (b) Indicate the manner of payment and method of calculation of the tax.
  - (c) If any applicable export tax is included in the export selling price, the amount of export tax should be indicated in the Column titled “**Export Tax**” in **Appendix 1**.
  - (d) Indicate the manner of payment and method of calculation of the export tax.

**B14.** For each shipment listed in response to question B7, compile and submit a copy of the following set of documents:

- (a) the importer's purchase order and your acknowledgment or acceptance of the order, or the contract of sale;
- (b) commercial invoice and credit/debit notes issued in respect of the sale;
- (c) Canada Customs invoice (if applicable);
- (d) bill of lading;
- (e) freight invoices covering any expenses incurred by or on behalf of your company for the movement of the goods from the factory to the final destination in Canada;
- (f) letter of credit (if applicable); and
- (g) proof of payment (bank advice statement).



- B15.** With respect to your export shipments to Canada listed in response to B7, provide details of any foreign currency buying and selling decisions (*hedging*) made by your company to minimize the effects of exchange rate movements on your Canadian sales revenue, such as *forward contracts*, *futures contracts* or options.
- B16.** With respect to your export shipments to Canada listed in response to B7, did your company adjust the selling price to Canada in order to account for currency fluctuations or any other reason? If so, explain.
- B17.** Are there any goods, services, rebates, warranties or guarantees provided directly or indirectly to *persons* who purchase the goods from the importer or from any person on any subsequent resale? If so, provide details concerning the nature and value of such benefits.
- B18.** Provide a listing by importer for the POI indicating the *average number of collection days* for your accounts receivable.
- B19.** If your company is not the manufacturer of the goods shipped to Canada:
- (a) provide the name, address, telephone number, fax number and contact person of the manufacturer and/or your supplier(s);
  - (b) indicate if the supplier knew or had reason to believe that the merchandise you were purchasing was ultimately destined for the Canadian market;
  - (c) indicate if there was any understanding giving permission to or responsibility for exporting to Canada;
  - (d) indicate if there was any understanding restricting, discouraging or prohibiting *sales* in the Canadian market or any other export market;
  - (e) indicate if the supplier had the right to review your export sales records; and indicate if the supplier provided after-sales service in Canada, participated in Canadian sales calls, sales activities, and/or provided sales incentives to your export customers.
- B20.** Identify all source documents on which you relied in preparing your response to this Part, and indicate the business location where the documents are maintained.

**REMINDERS:**

- 1. Any source material that you provide with your response must be in the original language and must be accompanied by a translation in either English or French.**
- 2. If your company is not the producer of the goods, it is your responsibility and in your own interest to ensure that the producer(s) provide(s) the CBSA with the necessary information as outlined in #24 of the Instructions.**
- 3. If you have designated any information confidential, a non-confidential version of that information must accompany your response to this RFI. See Part F for further details in this regard.**

## PART C - Domestic Sales Information

The information requested in this part is required to determine the normal values of the subject goods. Generally, where there are a sufficient number of profitable domestic sales of like goods to more than one unrelated customer, normal values are based on your company's domestic selling prices of the like goods. Some factors which may be taken into account and for which adjustments may be made include the trade level of the importer in Canada compared to the trade level of your domestic customers, the quantities of goods sold to importers in Canada compared with the quantities of like goods sold to your domestic customers, qualitative differences, taxation differences and other differences in terms and conditions of sale.

However, if there are insufficient or no domestic sales of like goods, if domestic sales of like goods are sold to only one customer or if domestic sales of like goods are not profitable, normal values will be based on your company's *total cost* of the goods plus an amount for profit. Questions on your costs are found in **Part D** of this RFI. The domestic sales of like goods that will be reviewed are those sales made in the **PAP**, from **October 1, 2012 to March 31, 2014**.

Like goods are goods that are identical in all respects to the subject goods exported to Canada, or in their absence, are goods that closely resemble the goods exported to Canada (similar goods). Some of the following questions require the identification of sales of identical or similar goods. Specifically, for purposes of this investigation, each model must be examined in order to determine if there are domestic sales of like goods that match the subject goods that were imported into Canada. In addition, to be considered like goods, goods must have been produced at the same production facility/factory as the subject goods exported to Canada.

- C1.** (a) Provide a detailed explanation of your company's channels of distribution to your domestic customers. Include a flow chart depicting the movement of the goods. Explain in detail any agency or distributor agreements and provide copies of each. At each step of the process, describe the functions or activities performed.
- (b) Do the selling prices of the like goods sold in your domestic market vary depending on the channel of distribution through which you sell? If yes, explain how and why the prices vary.
- C2.** Explain in detail the steps in the order-taking and filling process and the commercial documentation used by your company with respect to domestic sales from the point of receiving an order through to delivery and receipt of payment for the goods. Sample documentation (e.g. purchase order, commercial invoice, shipping manifest, credit/debit note) should be provided to illustrate the complete documentation process. If you sell by short-term or long-term contracts, include sample copies. Explain any terms on the documentation that are specific to the industry or are of a technical nature.

- C3.** (a) Provide catalogues and/or brochures relating to the like goods.
- (b) Provide the current price list and all price lists for the like goods in effect during the PAP (**October 1, 2012 to March 31, 2014**). Include any discount or rebate schedules used with each price list. Provide copies of any internal price guidelines used by your sales staff during the PAP.
- (c) If your company does not use price lists, describe how prices are determined. If price lists are not used, provide a detailed schedule showing each price change for each model during the PAP, and the effective dates of the price changes.
- (d) Have there been price changes in your domestic market since the end of the PAP? If so, provide the percentage change in price for each product line within the subject goods definition and indicate the reasons for the price changes.
- (e) Are price increases or decreases scheduled for the coming months? If so, provide the scheduled percentage change in price for each model line within the subject goods definition and indicate the reasons for the scheduled price changes.
- C4.** The CBSA considers the *date of sale* to be the date that the parties establish the material terms of the sale. The date of the order confirmation is usually considered the date of sale although the date of sale could be the contract, purchase order or invoice date, whichever establishes the terms of sale. If any of the terms of sale are subsequently revised, the date that the revision was made is usually considered the date of sale. In respect of your company's domestic sales:
- (a) at what stage in the process (e.g. contract date, purchase order date) are the material terms of sale established? In other words, what do you consider the date of sale and explain why;
- (b) if different methods are used to identify the dates of sale for different transactions, such as spot sales and short-term and long-term contracts, explain what you consider to be the date of sale for each type of transaction and explain why different methods are used; and
- (c) explain under what circumstances the terms of sale can be changed.
- C5.** For each domestic customer to whom your company sold the like goods during the PAP (**October 1, 2012 to March 31, 2014**), provide a list with the following information:
- (a) name of customer;
- (b) customer code;
- (c) address
- (d) relationship between your company and this customer (associated or not);
- (e) if known, indicate if customer is associated to any other domestic customer;
- (f) trade level;
- (g) total quantity and value of all goods purchased (both subject and non-subject goods), for the last fiscal year and the current fiscal year-to-date; and

- (h) indicate if the domestic customer is considered to be at the same trade level as your Canadian customer(s).

The following four questions require responses that must also be provided electronically in Microsoft Excel format. Please refer to #6 to #8 of the Instructions.

- C6.** The information to be provided in answer to this question will be for purposes of identifying the like goods sold in your domestic market and comparing them to the goods exported to Canada. Like goods are goods sold in your country that are identical goods or similar goods to the goods exported to Canada. As previously explained, for OCTG, identical goods would have **all** the same characteristics as those indicated in **Appendix 2 – Selection of Like Goods**. See the section entitled “Definition of Goods Subject to this Investigation” under the “Instructions” part of this RFI for guidance respecting the considerations in identifying “similar goods” in this investigation.

Using the data in **Appendix 1**, list the goods exported to Canada, on a model basis, as outlined in **Appendix 2**. For each model listed, provide the required information for the model characteristics as detailed in the instructions for **Appendix 2** [columns 2(a) to 2(g)] as well as indicating the factory (production facility).

For each model listed for goods exported to Canada, insert the most comparable model (name and/or number if used) of goods sold domestically and provide the required information for the model characteristics as detailed in the instructions for **Appendix 2** [columns 5(a) to 5(g)] as well as indicating the factory (production facility). Also indicate whether the goods are considered identical (**I**) or similar (**S**).

In the event there are no domestic sales of a like good (identical or similar) to the subject goods exported to Canada, insert “**N/A**” in the column under “Domestic Product”.

After listing the comparable domestic model for each model exported to Canada, list all other models, as defined as *goods of the same description*, which were sold in your domestic market but not sold to Canada.

**IMPORTANT NOTE:** Product descriptions, which are to be provided for all worksheets (**Appendix 1 to 4**), must be consistent when describing the same model and include the period of production, as electronic comparisons and manipulations will be made in analyzing the data. For example, if a domestic model is listed in **Appendix 2** (selection of like goods), this model must be described in exactly the same way and also include the period of production in **Appendix 3** (listings of domestic sales), **Appendix 4** (listings of total cost of goods). This also applies to **Appendix 1** (exports to Canada.) Please note that question C14 of this RFI asks for an explanation of product/model codes if used.

**C7. Listing of all domestic sales of goods of the same description as the subject goods:**

Please use the attached **Appendix 3** to provide a detailed listing of all domestic sales of goods of the same description sold during the PAP, whether or not you listed the product as a like good in **Appendix 2**. Please refer to the “Definition of Goods Subject to this Investigation” section at the beginning of the “Instructions” of this RFI. The domestic sales contained in this listing should be for ultimate consumption in your domestic market. Please clearly label this listing as **"Appendix 3A - All Domestic Sales of OCTG per C7"**.

Sales in this database must be adjusted for any credit notes issued respecting these sales, i.e., selling prices are to be net of credits. All remaining credits are to be removed from the database.

**C8. Listing of domestic sales of "like goods":**

There are certain legislative requirements in SIMA that must be taken into account in selecting like sales for the determination of normal values. In accordance with these legislative requirements, you are requested in this question to provide a second listing of selected domestic sales of like goods. The domestic sales contained in this listing should be for ultimate consumption in your domestic market. This second listing should be clearly labelled as **"Appendix 3B - Sales of Selected Like Goods as per C8"**.

Specifically, beginning with the database of sales of all goods of the same description prepared in response to question C7, please identify and list those sales of like goods that are:

- (a) sold to more than 1 unrelated<sup>4</sup> domestic customer;
- (b) which are sold to the same trade level<sup>2</sup> as the importer in Canada; and
- (c) which are sold in the same or substantially the same quantities<sup>3</sup> as the quantities sold to the importer in Canada.

If you have no sales of a like good which meet all three of the above conditions, then you should examine sales of the like good which were sold at the trade level nearest and subsequent<sup>4</sup> to the importer in Canada.

Sales of the like good at this *subsequent trade level* may be substituted in your sales listing only in the absence of sales which meet the three conditions listed above. However, in order to be given consideration, the sales of the like good at this subsequent trade level must also be made to more than one unrelated domestic customer and must be sold in the same or substantially the same quantities as the quantities purchased by the importer in Canada.

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<sup>1</sup> Refer to the definitions of "associated persons" and "related" listed in Part E (Glossary). Note that where two or more purchasers are associated with each other ("*associated purchasers*"), they are regarded as a single purchaser.

<sup>2</sup> Refer to the definition of "trade level" listed in Part E (Glossary).

<sup>3</sup> When the domestic sales are not sold in the same or substantially the same quantities as the sale of the goods to the importer in Canada, you should use those sales that are **closest in quantity** to the quantity of goods sold to the importer in Canada.

<sup>4</sup> Refer to the definition of "subsequent trade level" listed in Part E (Glossary).

- C9.** Please explain the rationale used in the selection of *like goods* in Appendix 2 if similar goods were identified. Explain which product characteristics your company has used to select comparable similar goods models of domestic sales and why those product characteristics were chosen. Also, please explain any deficiencies or difficulties in selecting comparable models of similar goods that might preclude the CBSA from conducting a proper comparison between sales of subject goods and like goods.
- C10.** Provide a worksheet that reconciles the total extended selling prices (total of column 21) for both **Appendix 3** listings of domestic sales as per C7 and C8) to your financial statements. The reconciliation should start with the C8 listing to the C7 listing then to your financial accounting system (general ledger or trial balance) up to your financial statements. If it is not possible to reconcile to audited financial statements, reconcile to interim financial statements. Provide a narrative explanation of the procedures followed to complete the accounting reconciliation.
- C11.** Describe each type of discount, rebate, or allowance offered on domestic sales of like goods, including the terminology used and the terms and conditions that must be met in order to receive each one. For each type of discount, rebate and allowance you offer, add a column, with an appropriate column heading, to your responses to questions C7 and C8 and indicate the amount of the discount, rebate or allowance granted on each sale. In addition, provide details of the methodology you have used to allocate each discount, rebate or allowance to the like goods.
- C12.** Indicate on what percentage of domestic sales of like goods listed in response to questions C7 and C8 each type of discount, rebate, or allowance was granted to domestic customers. The percentage must be calculated on a quantity basis, i.e., the quantity of like goods on which the discount was granted.
- C13.** With regard to the sales listed in response to C8, provide a complete documentation package for every 10<sup>th</sup> sale listed, up to a maximum of 20 sales. Each package should include:
- (a) the customer's purchase order and your acknowledgment of the receipt of the order, or the contract of sale;
  - (b) commercial invoices and credit/debit notes issued in respect of sales;
  - (c) bill of lading;
  - (d) proof of payment.
- C14.** Explain any product codes or other codes used by your company to enable a correlation between price lists, invoices, brochures, etc. and the listings of domestic sales.
- C15.** With respect to each cost, charge or expense, (e.g. freight, warehouse expense, etc.), included in the gross domestic selling prices of the like goods listed in **Appendix 3**, provide details of the methodology you have employed to allocate each cost, charge or expense to the like goods.

- C16.** For each customer identified in response to C7, provide a listing indicating the average number of collection days for your accounts receivable during the PAP (**October 1, 2012 to March 31, 2014**).
- C17.** For each level of trade identified in response to C7, provide the following information:
- (a) a detailed description of each direct sales activity you perform in selling to your domestic customers (for example, sales representatives, travel, entertainment, advertising);
  - (b) for each activity described in (a) above, indicate the cost of carrying out such activity in respect of the like goods;
  - (c) for each activity described in (a) above, indicate whether the same activity is performed at all by your company in selling to importers in Canada; and
  - (d) if any of the like goods identified in response to question C8 were sold to customers at the trade level nearest and subsequent to the trade level of the importer in Canada, a trade level adjustment may be allowed. If you think that you are entitled to a trade level adjustment, explain why (refer to the definitions of trade level and subsequent trade level in **Part E - Glossary**).
- C18.** If applicable, indicate the amount of any royalties or patent fees paid or payable for all goods of the same description listed in response to question C7. A breakdown of the amount of payment to each company is required. If applicable, explain why any such fees are not payable, or not payable in the same amounts, on models exported to Canada.
- C19.** If any applicable domestic commodity tax or any other domestic tax is included in the domestic selling price, the amount of the tax should be indicated in the Column titled “**Taxes**” (see **Appendix 3**). Indicate the manner of payment and method of calculation of the tax.
- C20.** If exports to Canada are partially or fully exempt from the payment of internal taxes and duties that are levied on sales for home consumption, or on the materials and components physically incorporated into the goods, or if such internal taxes and duties previously paid are remitted on export of the goods, provide:
- (a) an explanation of the legislation covering such exemption or remission, as well as a copy of the relevant regulations, with translation if required;
  - (b) the amount of duties and taxes refunded on the exportation of the goods and an explanation of how such amounts were calculated or apportioned to the exported goods;
  - (c) a record of the payment of the internal taxes and duties that were paid on goods sold domestically or on the material and components physically incorporated into the goods sold domestically but which were not levied on goods exported to Canada or other countries; and
  - (d) the calculated amount of such taxes and duties on a per unit basis. The allocation to each model must reflect the basis on which the taxes or duties are calculated.

- C21.** Are there any goods, services, rebates, warranties or guarantees provided directly or indirectly to persons who purchase the goods from your company or from any person on any subsequent resale? If so, provide details concerning the nature and value of such benefits. Include an explanation of the associated terminology, and any terms and conditions that must be met in order to receive the goods, services, rebates, warranties or guarantees.
- C22.** Provide an explanation of any sales listed in response to C7 that were not made under conditions where price was established by the forces of supply and demand. Describe any price and/or wage controls or restrictions imposed by government organizations or regulations that may limit the price you charge your domestic customers.
- C23.** If your company is not the manufacturer of the goods sold domestically:
- (a) provide the name, address, telephone number, fax number and contact person for the manufacturer(s) and/or your supplier(s);
  - (b) indicate if there was any understanding which restricted, discouraged or prohibited sales by your company, in your domestic market;
  - (c) indicate if the supplier had the right to review your domestic sales records; and
  - (d) indicate if the supplier provided after-sales service to your customers, participated in sales calls, sales activities, and/or provided sales incentives to your customers.
- C24.** Identify all source documents you have relied on in preparing your response to this Part and indicate the business location where the documents are maintained.

**REMINDERS:**

- 1. Any source material that you provide with your response must be in the original language and must be accompanied by a translation in either English or French.**
- 2. If your company is not the producer of the goods, it is your responsibility and in your own interest to ensure that the producer(s) provide(s) the CBSA with the necessary information as outlined in #24 of the Instructions.**
- 3. If you have designated any information confidential, a non-confidential version of that information must accompany your response to this RFI. See Part F for further details in this regard.**



## PART D - Financial Data and Costing Information

The information gathered in this section will be used to determine whether your domestic sales are profitable. For models where normal values cannot be determined on the basis of domestic selling prices, the information that is to be provided in this section may facilitate the determination of normal values based on the **total cost** of the goods.

For this part, appropriate footnotes should be provided to explain (1) accounting treatment of any item(s) that deviate from established practices and (2) all corporate allocations. The information provided should enable the CBSA to follow the audit trail from the individual model cost to financial accounting records (such as subsidiary and general ledgers) and to corporate financial statements.

### Source Documents, Accounting Records and Reports

- D1.** Provide a **list** of all source documents used to prepare your responses to this part and indicate the location where the documents are kept.
- D2.** Provide a **list** of your general ledger chart of accounts. If your chart of accounts is in a language other than English or French, provide the original language version and a translation in either English or French. The chart of accounts must be accompanied by explanatory notes which would enable the reader to identify the major groups and subgroups of account classifications (e.g. major group may be Assets, with a sub-group under Current Assets).
- D3.** Provide a complete **list**, in either English or French, of all your accounting and financial ledgers used for recording all your accounting, cost accounting (if applicable) and financial activities that lead to the preparation of your company's financial statements. Your list should include the following information:
- (a) the title;
  - (b) a brief description of each ledger;
  - (c) a computer report reference number, if applicable; and
  - (d) the name of the department providing the information.
- D4.** (a) Provide a **list** of all reports prepared on a periodic basis for senior management, for example, Aging of Accounts Receivable, Variance Analysis Reports, Fourth Quarter Results, Five Year Operational Plan, etc. The list should include:
- (i) the title and date of the report;
  - (ii) a brief description of the information contained in each report;
  - (iii) the reason for the report;
  - (iv) a computer report reference number, if applicable;
  - (v) the name of the department providing the information; and
  - (vi) the identity and position of the person(s) for whom the report was generated.
- (b) Provide a flowchart illustrating your company's financial accounting books and record keeping system. Show in your flowchart all subsidiary ledgers and reports generated by your company's financial accounting system (e.g. subsidiary ledgers maintained for raw materials purchases, inventories, sales, accounts receivable, etc.).

## **Financial Data**

- D5.** Indicate the date of your company's fiscal year-end.
- D6.** Provide your corporate annual report for the last two fiscal years. If you do not publish annual reports, provide a copy of the final report on the operational results of the company, prepared for senior management, the board of directors and/or the shareholders.
- D7.** Provide your corporate annual report, filed with the government agency that regulates public companies in your country, for the last two fiscal years and all year-to-date reports. For example, in the United States of America, these reports are filed with the United States Securities and Exchange Commission. If you do not file such reports, provide a copy of your company's income tax return and income tax reconciliation report for the last two taxation years.
- D8.** Provide the following information for both for your company and each subsidiary or division of your company that produces the goods sold to the importers in Canada and the goods sold domestically:
- (a) audited financial statements for the last fiscal year;
  - (b) monthly financial statements for the last fiscal year;
  - (c) financial statements for the current fiscal year-to-date; and
  - (d) monthly financial statements for the current fiscal year-to-date.

If your company does not have divisional financial statements, provide any reports generated by the division, such as management reports, performance reports, production cost statements, operating reports or interim reports.

Include all the financial statements prepared for the fiscal year end, the accompanying notes, the auditors' opinion and supplementary reports.

Where audited financial statements do not exist, provide copies of the final unaudited financial statements approved by senior management. Include all accompanying notes and final reports. Explain why the company's financial statements are not audited.

- D9.** Provide any summary financial report used to reconcile all companies' financial data to the corporate annual report, for the last fiscal year.
- D10.** Provide any summary financial report used to reconcile all subsidiary or divisional financial data to the company financial statements, for the last fiscal year.
- D11.** For each production facility that produces the subject goods shipped to importers in Canada and the like goods sold domestically, provide the following:

- (a) income or profit and loss statements for the last fiscal year;
- (b) monthly income or profit and loss statements for the last fiscal year;
- (c) income or profit and loss statements for the current fiscal year-to-date; and
- (d) monthly income or profit and loss statements for the current fiscal year-to-date

### **Accounting Practices**

- D12.** What generally accepted accounting standards were followed by your company for the preparation of the financial statements provided in answer to question D8? Do these accounting standards comply with the International Financial Report Standards (IFRS) set by the International Accounting Standards Board (IASB)? If there are any standards that do not comply, please list the differences between the reporting standards followed by your company and IFRS.
- D13.** For each item listed in (a) to (j) below, explain your accounting practices for the goods sold domestically and the goods sold to importers in Canada. Your explanation should include any differences in your accounting practices for: (i) cost accounting purposes; (ii) financial accounting purposes; and (iii) income tax purposes. Where there are differences, explain the impact on the *cost of goods sold*, the income statements and any other general ledger accounts:
- (a) inventory valuation for raw materials, work-in-process and finished goods;
  - (b) write-off and write-down methods for raw materials and finished goods;
  - (c) value and disposal of *by-products* and *scrap materials* from the production process;
  - (d) fixed asset valuation (separate by group, for example buildings, capital equipment, etc.), revaluation, depreciation method, and treatment of idled assets;
  - (e) plant start-up, plant closure, shut-down or restructuring;
  - (f) interest expense as part of inventory or fixed asset valuation;
  - (g) conversion of year-end asset and liability balances;
  - (h) capitalization of general and *administrative expenses*;
  - (i) income and expense accounts requiring year-end accruals and adjustments;
  - (j) treatment of exchange gains and losses resulting from foreign currency transactions; and
  - (k) explain how your company's cost accounting system accounts for unfinished units (i.e., work-in-process) within each cost centre at the end of an accounting period. If

special calculations are involved (e.g. calculation of equivalent units of production), provide an explanation of the calculation methodology.

**Product Line Information**

**D14.** For each production facility or factory, provide the following information for the product line that includes the goods subject to this investigation:

Indicate the PRODUCT LINE that includes the goods subject to this investigation		
	Last Fiscal Year	Current Y-T-D
Plant (identify)	Metric Tonnes	Metric Tonnes
Production Capacity		
(a) Beginning inventory		
(b) Quantity produced		
(c) Quantity purchased from other suppliers or producers		
(d) Quantity sold		
(e) Quantity and value of goods transferred internally to other operations or divisions within the company for use in downstream operations		
(f) Quantity and value of goods sold or transferred to affiliated or <i>associated persons</i>		
(g) Ending inventory		

**Production Information**

**D15.** For each production facility or factory producing the goods sold domestically and/or the goods exported to importers in Canada, for each stage of production provide:

- (a) a flow chart of the production process;
- (b) a description of each stage in the production process;
- (c) the type of machinery used during each stage and its standard useful life;
- (d) a list of material inputs used in each stage;
- (e) the production time, expressed in the industry standard;
- (f) a list of by-products;
- (g) details of *waste material* and/or scrap material; and
- (h) an explanation of how overhead is allocated.

**D16.** Explain in detail how you cost the goods sold domestically and the goods sold to importers in Canada. Provide this explanation for each production facility or factory.

Provide an example and describe how your model costing system captures all production costs of the goods.

- D17.** If using standard or budgeted costs, identify:
- (a) the types of *variances*;
  - (b) how they are recorded in the cost accounting system;
  - (c) how they are assigned to the goods;
  - (d) when the variances are recorded, for example monthly, quarterly, etc.;
  - (e) how often the *standard costs* are revised; and
  - (f) the date of the latest revision.
- D18.** Describe how the company's cost accounting system reconciles to the financial accounting system. List and describe any production costs that you value differently for cost accounting purposes than for financial accounting purposes and reconcile these differences.
- D19.** A start-up period of production is applicable when there is a new production facility, or a new or substantially different model that requires new or different technology or production equipment. A start-up period of production affects costs and the level of production.
- (a) If you had a start-up period, for the goods sold domestically and the goods sold to importers in Canada during the PAP (**October 1, 2012 to March 31, 2014**), describe the particulars of the start-up period. Specify the beginning and the end of the start-up period.
  - (b) Explain the effect the start-up had on the cost of the goods.
- D20.** Indicate whether any of your production facilities were shut down, closed or restructured during the PAP, and whether you incurred any expenses during the period as a result.

### **Acquisition Cost**

- D21.** If your company is not the manufacturer of the goods, provide the following on a model-by-model basis and then proceed to the section titled "Administrative, Selling and All Other Costs":
- (a) the purchase price paid to your supplier for the goods;
  - (b) the freight cost, charges or expenses incurred between yourself and your supplier;
  - (c) rebates between yourself and your supplier;
  - (d) the commission between yourself and your supplier;
  - (e) any other costs, charges or expenses incurred in acquiring the goods; and
  - (f) the total per unit processing costs that you incur, for example, cutting manufactured model to specified lengths, heat-treatment, end-finish, value-added coatings etc.

## **Cost of Production**

- For the cost information requested in D22, provide costs for **each production facility or factory**, for all models of OCTG exported to Canada as listed in **Appendix 2**, as well as for all models sold to your domestic customers as listed in **Appendix 2** whether considered as a like good or not (i.e., goods of the same description). If the cost of production of the subject goods exported to Canada differs from the cost of production of the like goods, provide separate cost of production statements for like and subject goods.
- The costs of production for the like goods sold domestically will form the basis for conducting the profitability analysis. The costs of production for the subject goods exported to Canada will be used, if required, as the basis for determining a cost-based normal value.
- Actual costs are preferred. These costs should be calculated on a monthly basis or, alternatively, on an order basis. **There should therefore be one cost of production calculated for each unique OCTG product for each month or, alternatively, for each order, to recognize fluctuating costs.** If standard or budgeted costs are used, identify the *variances* that are recorded in the cost accounting system as requested in question D17. For example, if variances are recorded monthly, the appropriate monthly variances should be provided. Indicate the frequency with which the standard costs are revised and the date of the latest revision. Explain how favourable or unfavourable variances resulting from production are assigned to the goods during each accounting period.
- Where costs, charges, or expenses are **allocated**,<sup>5</sup> explain how these are allocated to the goods in question and provide the supporting worksheets in your response. If they are also allocated to goods other than those in question, explain the method of allocation and explain why the method of allocation is appropriate.
- Provide costs for the PAP (**October 1, 2012 to March 31, 2014**). If costs changed over the period, provide: all of the various costs; the time period each cost was in effect; and explain the changes.
- In responding to question D22, where there was a start-up period (refer to question D19), do not provide costs incurred during the start-up period. Provide costs from the end of the start-up period. If the start-up period extended beyond March 31, 2014, provide the costs that were in effect on March 31, 2014.
- In presenting your company's full cost of production, the CBSA recognizes that individual companies may not account for their costs in a manner that allows for the presentation of costs for each of the listed cost components that follow in question D22. **Provided the costs presented are complete and represent the full cost of production, you may present your costs in a manner consistent with your own cost accounting reporting practices.**

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<sup>5</sup> Allocation of costs, charges and expenses to subject goods should reflect the normal or standard method of allocation used by your company in assigning costs to product lines. Where the basis of allocation is deemed inappropriate, the CBSA may re-allocate these costs, charges and expenses to the subject goods in accordance with Generally Accepted Accounting Principles (GAAP).

**D22.** The following cost components should be provided on a per **unit** basis for each model imported into Canada during the POI as well as for each model sold domestically during the PAP. Again, please note that cost components may be presented differently as long as all costs of production are captured and their presentation facilitates the reconciliation of costs of production with your accounting records.

(a) Direct Materials

List the raw materials or major components. Provide the quantities of the direct materials utilized and the full cost, for each model.

Note that materials or components that are obtained from another division, production facility/factory, or associated company should be identified. The value of these materials should be the actual costs to the division, production facility/factory or associated company that produced or acquired the materials plus an amount for any corporate allocations, overheads, and financial charges. In addition, the cost of engineering or design work incurred by another division, production facility/factory or associated company that is attributable or in any manner related to the production of the materials or components should be identified and included in the cost thereof.

(b) By-Products

If applicable, list each by-product that results from the production process of the goods. Describe how you dispose of by-product and provide the value of each by-product, expressed on a per model basis of finished product.

(c) Direct Labour

Provide the labour cost per model. Labour cost includes overtime pay, all fringe benefits, and payments for social programs. Explain how you determine direct labour cost and provide the details of your unit of production labour cost calculation.

(d) Factory Overhead

Provide *factory overhead* expenses per model. Factory overhead expenses include shop supplies, tools and dies, utilities, indirect labour, supervision, maintenance, rent, depreciation, etc. Explain how you allocate these expenses and identify the general ledger accounts involved.

(e) Scrap Recovery Value

If applicable, identify the total scrap recovery value per unit.

(f) Other Costs of Production

List any other costs applicable to the production of the goods, for example, research and development. Provide these costs on a per model basis. Explain how you allocate these expenses and identify the general ledger accounts involved.

## **Administrative, Selling and All Other Costs**

- Questions D23 to D28 relate to the *administrative and selling expenses* (including corporate overhead), interest expenses and all other costs that are directly or indirectly attributable to the sale and production of the goods sold domestically and the subject goods sold to importers in Canada.
- Normally, administrative and selling expenses and all other costs are allocated to the goods sold to importers in Canada on the same basis as the expenses attributed to the sale and production of the goods sold domestically.<sup>6</sup> **Please note that for the purposes of this investigation, the allocation of these expenses on the basis of selling prices is not acceptable. An allocation based on annual cost data is preferable to one that will be skewed in periods of high or low production.**
- You must fully explain each step in the allocation process in allocating administrative, selling and all other costs to the goods, referring to the starting amount to be allocated, the ledger accounts (s) and/or source document, and the rationale and basis for allocation to the subject goods.
- In the event there are no like goods sold domestically, the expenses to attribute to the goods sold to importers in Canada are the amounts directly or indirectly incurred for the sale and production of the goods sold to importers in Canada.

**D23.** Provide an explanation of your company's normal accounting and reporting practices for administrative, selling and other costs.

**D24.** For your company's administrative and selling costs, including corporate overhead costs:

- (a) list each administrative, selling and corporate overhead cost and identify the associated general ledger account;
- (b) calculate the total amount of these costs;
- (c) determine the amount of the administrative, selling and corporate overhead costs to be allocated to the goods sold domestically and calculate these expenses on a per unit basis, preferably as a percentage of cost of goods sold;
- (d) determine the amount of the administrative, selling and corporate overhead costs to be allocated to the goods sold to importers in Canada and calculate these expenses on a per unit basis (preferably as a percentage of cost of goods sold); and
- (e) explain your method(s) of allocating the costs in (c) and (d).

**D25.** For your company's net interest costs:

- (a) list each source of interest income earned on short-term investments or operational bank accounts and identify the associated general ledger accounts;

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<sup>6</sup> An adjustment may be allowed if there are direct sales activities which the exporter performs in the domestic market, which the exporter does not perform at all in selling to the importer in Canada, because it is the importer's role (i.e. a function of the importer's trade level) to perform these activities in Canada. Refer to the definition of *trade level* in the Glossary, Part E of this RFI.



- (b) list each interest cost incurred on all forms of liability and identify the associated general ledger accounts;
  - (c) calculate total net interest cost by deducting the amount of interest income in (a) from the interest cost in (b). Interest income may not offset interest cost beyond a zero net balance;
  - (d) determine the amount of net interest costs to be allocated to the goods sold domestically and calculate these expenses on a per unit basis, preferably as a percentage of cost of goods sold;
  - (e) determine the amount of net interest costs to be allocated to the goods sold to importers in Canada and calculate these expenses on a per unit basis, preferably as a percentage of cost of goods sold; and
  - (f) explain your method(s) of allocating the costs in (d) and (e).
- D26.** Determine your company's other costs, charges and expenses, including those incurred at the corporate level, that are directly or indirectly attributable to the production and sale of your company's goods. These costs may include such items as losses or gains from foreign exchange transactions. For these other costs, charges and expenses:
- (a) list each item separately and identify the associated general ledger accounts;
  - (b) calculate total net cost (the net cost may not offset gains beyond a zero net balance);
  - (c) determine the amount of net costs to be allocated to the goods sold domestically and calculate these expenses on a per unit basis, preferably as a percentage of cost of goods sold;
  - (d) determine the amount of net costs to be allocated to the goods sold to importers in Canada and calculate these expenses on a per unit basis (preferably as a percentage of cost of goods sold); and
  - (e) explain your method(s) of allocating the costs in (c) and (d).
- D27.** Determine the cost of sales or production royalties or patent fees paid or payable on your company's goods. If applicable, explain why any such fees are not payable, or not payable in the same amounts, on goods exported to Canada. For a breakdown of the cost of royalties and patent fees:
- (a) list each separately and identify the associated general ledger accounts;
  - (b) calculate the total amount for each;
  - (c) determine the amount of the royalty or patent fee to be allocated to the goods sold domestically and calculate these expenses on a per unit basis, preferably as a percentage of cost of goods sold;
  - (d) determine the amount of the royalty or patent fee to be allocated to the goods sold to importers in Canada and calculate these expenses on a per unit basis, preferably as a percentage of cost of goods sold; and
  - (e) explain your method of allocating the fees in (c) and (d).
- D28.** Provide information on all expected year-end adjustments that will have a material impact on the operating results of your company. These adjustments may be because of: legislation; other government actions; a change in accounting methods, standards or practices; or any contingency, expected liability or extraordinary or unusual item that will be recognized during the current accounting period. For year-end adjustments:

- (a) list each item separately and identify the associated general ledger accounts;
- (b) calculate the total amount of these costs;
- (c) determine the amount of the adjustment to be allocated to the goods sold domestically and calculate these expenses on a per unit basis, preferably as a percentage of cost of goods sold;
- (d) determine the amount of the adjustment to be allocated to the goods sold to importers in Canada and calculate these expenses on a per unit basis (preferably as a percentage of cost of goods sold); and
- (e) explain your method of allocating the adjustments in (c) and (d).

**D29.** Provide information on expenses (up the highest corporate level) that were not allocated to the goods sold domestically and the goods sold to importers in Canada. Identify and indicate the amounts of these expenses. Provide an explanation on the nature of these expenses and why they were not allocated.

### **Total Cost of Goods**

- Use the information in questions D22 to D29, to compile total cost databases. The model per unit total cost is the sum of the costs from the “Cost of Production” section and the costs from the “Administrative, Selling and All Other Costs” section.
- If you used standard costs to calculate costs of production, ensure that variances are included in the total cost of production.

**D30.** Using the suggested format for **Appendix 4**, compile on a model basis, the unit total cost for:

- (a) all models of subject goods imported into Canada during the POI, as listed in **Appendix 1**. Label this “**Appendix 4A - Total Cost of Goods - Export Sales to Canada**”; and
- (b) all models of goods of the same description as the subject goods sold domestically during the PAP, as listed in **Appendix 3A**. Label this “**Appendix 4B - Total Cost of Goods - Domestic Sales.**”

**D31.** Provide a copy of the cost summary sheets as they appear in your model costing system for 10 randomly selected models listed in **Appendix 4A** for sales to Canada as well as another 10 randomly selected models for goods listed in **Appendix 4B** for domestic sales. This must be accompanied by a full explanation of the cost sheet and its contents, including a legend for any codes used. Cost of production data from the selected cost summary sheets should be reconcilable with **Appendix 4A and 4B**.

**D32.** Provide a worksheet that includes a reconciliation of the model per unit total cost of production for two of the randomly selected models from **Appendix 4A and 4B** (one from each) to the cost accounting system (if applicable) and the financial accounting system (general ledger) and then to your financial statements (audited or interim). Provide a narrative explanation of the procedures followed to complete the accounting reconciliation.

### **IMPORTANT REMINDERS**

- 1) Responses to questions, where data is required to be provided in worksheet format, must also be provided in electronic format. Refer to the Instructions regarding the submission of data in electronic format.**
- 2) Allocations should be based on annual data, which are preferable to those that will be skewed in periods of high or low production. Explanations must be provided to give a clear understanding of the method of allocation and in sufficient detail to enable the CBSA to trace and verify the amounts allocated back to ledger accounts and source documents.**
- 3) Any source material that you provide with your response must be in the original language and must be accompanied by a translation in either English or French.**
- 4) If your company is not the producer of the goods, it is your responsibility and in your own interest to ensure that the producer(s) provide(s) the CBSA with the necessary information.**
- 5) If you have designated any information confidential, a non-confidential version of that information must accompany your response to this RFI. See Part F of the RFI for further details in this regard.**

## PART E - Glossary

<b>Administrative and Selling Expenses</b>	While the following list is not exhaustive, administrative and selling expenses include: directors' fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment and depreciation expenses. Administrative and selling expenses also include corporate overhead.
<b>Associated Persons and/or Companies</b>	Persons or companies that are related to each other or do not deal with each other at arm's length. For example, individuals related by blood, marriage or adoption or companies that are directly or indirectly controlled by the same person or by the same company. See "related".
<b>Associated Purchasers</b>	Where two or more purchasers are associated persons and/or companies, they will be regarded as a single purchaser.
<b>Average Number of Collection Days/Aging of Accounts Receivable</b>	The average number of days between the invoice date and the date of receipt of payment for goods sold. Aging reports provide details regarding the amounts due and those past due based on various predetermined time frames.
<b>Bank Charges</b>	Any charge incurred as a result of services rendered by a bank or other financial institution in respect of the sale, shipment, financing, payment, etc. of the goods sold.
<b>By-products</b>	A marketable product of lesser importance produced as an incident to the production of a major product.
<b>Cash Discount</b>	This is a discount to the selling price of the goods that may be granted to customers by the vendor for the early payment of invoices. Sometimes called a prompt payment discount. Example: 2% 10, net 30 days.
<b>Cost of Goods Sold</b>	Cost of goods sold is generally calculated by totalling the opening inventory and production costs and deducting there from the amount of closing inventory.
<b>Date of Sale</b>	The date of sale is considered to be the date that the parties establish the material terms of sale. The date of the order confirmation is usually considered as the date of sale, although the date of sale could be the contract, purchase order or invoice date. If any of the terms of sale are changed substantially, (i.e., significant change in price or quantity ordered), the date that the revision was made may be considered to be the date of sale.
<b>Date of Shipment</b>	The date of shipment is the date the goods began their continuous journey to the customer.

<b>Discounting or Factoring of Accounts Receivable</b>	Discounting of accounts receivable is the sale, usually at a discount, of a company's accounts receivable.
<b>Dock Charges</b>	Any levy paid as a result of using dock or port facilities for movement of goods.
<b>Dumped</b>	Dumped, in relation to any goods, means that the normal value of the goods exceeds the export price.
<b>Export Price</b>	Export price is usually the lesser of the exporter's adjusted selling price for the goods or the importer's adjusted purchase price. Where there is no exporter's sale price or no price at which the importer in Canada has purchased or agreed to purchase the goods, or where the price is considered to be unreliable because the sale is between associated persons or there exists a compensatory arrangement, the export price is based on the price at which the goods are sold by the importer in Canada to unrelated purchasers in Canada, less related expenses and an amount for profit.
<b>Factory Overhead</b>	All production costs other than direct material and direct labour costs. Factory overhead includes all costs necessary to the operation and maintenance of the production facility/factory and is frequently divided into two categories namely, variable and fixed. Factory overhead does not include administrative and selling expenses but includes depreciation expense.
<b>Forward Sale/Contract</b>	A forward sale is a contract that commits the user to buying or selling an asset, such as a treasury bill or dollars, at a specific price on a specific date in the future.
<b>Futures Contract</b>	A forward contract that is traded on an exchange.
<b>Goods in Question</b>	May be either subject goods (goods sold to Canada which match the product definition) or like goods (goods sold domestically that are identical or similar to the subject goods).
<b>Goods of the Same Description</b>	Oil country tubular goods, which are casing, tubing and green tubes made of carbon or alloy steel, welded or seamless, heat-treated or not heat-treated, regardless of end finish, having an outside diameter from 2 3/8 inches to 13 3/8 inches (60.3 mm to 339.7 mm), meeting or supplied to meet American Petroleum Institute specification 5CT or equivalent and/or enhanced proprietary standards, in all grades, excluding drill pipe, pup joints, couplings, coupling stock and stainless steel casing, tubing or green tubes containing 10.5 percent or more by weight of chromium, which are sold in the exporter's domestic market.
<b>Hedging/Covering</b>	Hedging is the purchase and holding of foreign currency for a length of time. Its purpose is to eliminate risks involved in dealing with foreign currencies. Also called covering and swap deposits.

<b>Identical Goods</b>	Identical goods are goods that are identical in all respects to the subject goods exported to Canada by having all the characteristics used to identify a model. For this investigation, a good is identical when it has the same following seven characteristics: <ol style="list-style-type: none"> <li>1. Product Type</li> <li>2. Grade</li> <li>3. Outside Diameter</li> <li>4. Gauge (nominal weight)</li> <li>5. End Finish</li> <li>6. Length (Range 1, 2 or 3)</li> <li>7. Value added coatings (i.e. corrosion or wear protection)</li> </ol>
<b>Inland Freight</b>	All costs, charges and expenses associated with shipping goods via land but may sometimes include the charges and expenses associated with inland waterways.
<b>Like Goods</b>	Like goods are goods that are identical in all respects to the subject goods exported to Canada, or in the absence of identical goods, goods the uses and other characteristics of which closely resemble those of the exported goods (similar goods).
<b>Ministerial Specification</b>	A Ministerial specification is used to determine the normal values, export prices or the amounts of subsidy when the regular methods for making the calculations cannot be applied. It may also be used to cover new models or new exporters not covered by previous rulings.
<b>Model</b>	Model is the generic term used throughout this RFI to identify individual models with various distinct characteristics.
<b>Normal Value</b>	Normal value is usually based on the price at which an exporter sells like goods for domestic consumption in the ordinary course of trade to unrelated purchasers. Where normal values cannot be determined based on domestic selling prices, normal values will be determined based on the aggregate of the cost of production, an amount for administrative, selling and all other costs and an amount for profit. In the absence of the required information, the normal value is based on a Ministerial specification.
<b>Packing Costs</b>	The charges normally associated with leasing or renting of a container and may include charges for packing or unpacking.
<b>Period of Investigation (POI)</b>	The POI represents the time frame selected at the time of initiation to identify the <u>importations</u> into Canada for which information is required and that will be investigated. The POI for this investigation is from <b>January 1, 2013 to March 31, 2014.</b>
<b>Person</b>	Includes a partnership, corporation or an association.

<b>Product</b>	Product is the generic term used throughout this RFI to denote an individual model based on the characteristics used to establish identical goods.
<b>Profitability Analysis Period (PAP)</b>	The PAP is the length of time during which the profitability of domestic market sales is tested. The PAP for this investigation is from <b>October 1, 2012 to March 31, 2014.</b>
<b>Related</b>	For the purposes of defining “associated persons”, persons are considered to be related if <ul style="list-style-type: none"> <li>• they are connected by blood relationship;</li> <li>• one is an officer or director of the other;</li> <li>• each such person is an officer or director of the same two corporations, associations, partnerships or other organizations;</li> <li>• they are partners;</li> <li>• one is the employer of the other;</li> <li>• they directly or indirectly control or are controlled by the same person;</li> <li>• one directly or indirectly controls or is controlled by the other;</li> <li>• any other person directly or indirectly owns, holds or controls 5% or more of the outstanding voting stock or shares of each such person; or</li> <li>• one directly or indirectly owns, holds or controls 5% or more of the outstanding voting stock or shares of the other.</li> </ul>
<b>Sale</b>	Includes leasing and renting, an agreement to sell, lease or rent and an irrevocable tender.
<b>Scrap Material</b>	Scrap material is material left over from certain production processes. Scrap typically has some measurable but relatively minor recovery value.
<b>Similar Goods</b>	Similar goods are goods that are not identical in all respects but are similar in use and in characteristics to the subject goods exported to Canada.
<b>Standard Cost</b>	Standard costs are predetermined or budgeted (estimated) costs per unit of a model or process, comprising labour, materials and overhead. Standard costs are typically based on historical data and are the base against which actual costs are compared and variances measured and analyzed.

<b>Subject Goods</b>	Oil country tubular goods, which are casing, tubing and green tubes made of carbon or alloy steel, welded or seamless, heat-treated or not heat-treated, regardless of end finish, having an outside diameter from 2 3/8 inches to 13 3/8 inches (60.3 mm to 339.7 mm), meeting or supplied to meet American Petroleum Institute specification 5CT or equivalent and/or enhanced proprietary standards, in all grades, excluding drill pipe, pup joints, couplings, coupling stock and stainless steel casing, tubing or green tubes containing 10.5 percent or more by weight of chromium, originating in or exported from Chinese Taipei, the Republic of India, the Republic of Indonesia, the Republic of the Philippines, the Republic of Korea, the Kingdom of Thailand, the Republic of Turkey, Ukraine and the Socialist Republic of Vietnam
<b>Subsequent Trade Level</b>	Refers to the next lowest trade level, subsequent to the trade level of the importer in Canada, to which you sell in your domestic market. In this context, the producer is considered to be at the highest trade level and the end-user at the lowest trade level. In determining the normal value of the goods, adjustments may be made to your domestic selling price to account for differences in trade level between the importer in Canada and your domestic customers. See also "trade level".
<b>Total Cost</b>	Total cost is the cost of producing the good plus administrative, selling and all other costs.
<b>Trade Level</b>	The level that a company occupies in the distribution chain for a product. The predominant determining factor in establishing the trade level of an entity is the trade level to which that entity in turn sells the goods. The activities that the entity carries out may also help in distinguishing the trade level. Examples of typical trade levels are, in descending order: producer, national distributor, regional distributor, wholesaler, retailer and end-user. See also "subsequent trade level".
<b>Transfer Price</b>	The price charged by one division or section to another division or section of the same corporation, or the price charged between two associated companies, for products or services supplied.
<b>Variance</b>	A variance is the difference between actual cost and standard cost of a cost element, e.g. material price variance, material usage variance, labour rate variance, etc.
<b>Warehousing</b>	All costs, charges and expenses associated with storing goods <u>while on route to Canada</u> , such as bonded warehouse fees.
<b>Waste Material</b>	Waste material is material that is lost, evaporates or shrinks during certain production processes and typically has no measurable recovery value but does have added cost.



## **PART F - Treatment of Confidential and Non-Confidential Information**

### **Submitted to the CBSA for all Proceedings under SIMA**

#### **Why Provide Confidential and Non-Confidential Information?**

The *Special Import Measures Act* (SIMA) requires that confidential information submitted to the CBSA be accompanied by a non-confidential (public) version of the information. The following explains how non-confidential and confidential information will be handled and how to prepare both a confidential and non-confidential submission of your information.

#### **Treatment of Your Non-Confidential Information**

Your non-confidential information will be given to any party that asks for this information for the purposes of the proceeding.

#### **Treatment of Your Confidential Information**

There are certain times when the CBSA will release your confidential information: first, to independent counsel for a party to the proceeding; and second, to Canadian courts, tribunals and panels.

1. Confidential information will be provided to independent counsel for a party to the proceeding. Counsel includes any *person* who represents another party in the proceeding and includes legal counsel. A party is a person, or business, that participates in and has a direct interest in the proceeding.

Counsel must ask for the confidential information in writing and must provide a written guarantee to the CBSA stating that they will:

- only use the information in relation to this proceeding;
- not give out the information;
- protect the information;
- not copy the information without the CBSA's permission;
- destroy the information when they are done;
- provide the CBSA with a written notice that the information is destroyed; and
- report any violations or possible violations to the CBSA.

The CBSA will not give your confidential information to independent counsel if the CBSA believes that it might cause harm to you or your business.

2. Confidential information will be given to the Canadian International Trade Tribunal, any Court in Canada, a Binational or World Trade Organization (WTO) Panel, to act on appeals. These organizations will use your information to fulfill their responsibilities under Canadian law, NAFTA or WTO Agreements. The confidential information is subject to the rules of procedure of the Court or Panel to which it is provided.

## Providing Only Non-Confidential Information?

If you decide that your reply to this RFI does not contain confidential information, every page of your reply should be marked "NON CONFIDENTIAL". You must make a statement, in a covering letter, that you do not consider any information in your submission to be confidential.

## Providing Confidential Information?

If your reply to this RFI contains confidential information, this reply, along with all of the attachments and supporting documents, will be your confidential submission. You must:

1. Clearly indicate, by either enclosing all confidential information within square brackets or by shading all confidential information contained in the confidential version. An sample of each method is provided in the "Non-confidential Edited Version" section below, and
2. Clearly mark "CONFIDENTIAL" on every page of the confidential submission, including all attachments.

If you have a submission with confidential information, for the CBSA to be able to use your information, **you must provide a non-confidential version**. It is important that your non-confidential version is complete, as it will be provided to other parties involved in these investigations if they request it.

Your non-confidential version may be in the form of:

- a non-confidential edited version; or
- a non-confidential summary version, where the edited version would not contain enough information to convey a reasonable understanding of the information submitted in the confidential version

## Non-confidential Edited Version

An edited version has the confidential information removed, to create a non-confidential version. You must leave enough detail to provide an understanding of the confidential information removed.

In the document called "**Non-Confidential Statement**" attached to this section, which must be attached with your non-confidential version, you must:

- A) explain briefly the nature of the confidential information removed in your non-confidential version; and
- B) give the reasons why you request that the information be treated confidential, as explained in this part of the **RFI**.

In the following example, the text indicates the nature of the bracketed [**confidential information**] that has been deleted in the non-confidential version.

The confidential response to a request may be: The selling price of model ABC to our Canadian distributor was US\$[25.99] per unit.

The non-confidential edited version of this response may be: The selling price of model ABC to our Canadian distributor was US\$[ ] per unit. In this example, the nature of the information removed in the non-confidential version relates to “selling price information.”

**NOTE: the spacing between the brackets [ ] should reflect the same spacing as in the confidential version.**

As a further example, the following would represent an acceptable non-confidential edited version of an export sales listing. A sample page for a multi-page listing could look like this:

1	2	3	4	5	6	7
IMPTR	DATSHIP	INVNUM	INVDATA	QUANTITY	EXTSP	NETSP
[ ]	2013/02/16	14064555	2013/02/16	[ ]	[ ]	[ ]
[ ]	2013/03/14	14179020	2013/03/12	[ ]	[ ]	[ ]
[ ]	2013/04/14	14253018	2013/04/16	[ ]	[ ]	[ ]
[ ]	2013/05/09	14474937	2013/05/09	[ ]	[ ]	[ ]

**NOTE:**

**Do not use “shading”, “highlighting”, “font colors” or any other type of masking to hide confidential information in the non-confidential electronic version. You must delete (remove) the confidential information in the non-confidential version.**

**If you use a black marker to hide confidential information on the paper version of the non-confidential version or in any attachments to the non-confidential version, please ensure that the black shading covers everything and that it is dark enough not to reveal confidential information when we will save electronically your documents in PDF format.**

### **Non-Confidential Summary Version**

Where deleting information for a non-confidential edited version would not leave enough detail to provide an understanding of the confidential information removed, a non-confidential summary of the deleted information must be included, describing the confidential information that has been removed.

If you intend to provide a non-confidential summary of an appendix or attachment, the non-confidential narrative would normally be accompanied by at least one (1) sample page, with the confidential data removed, of the related appendix or attachment.

### **Review of Non-Confidential Submission**

The non-confidential version of your submission will be reviewed by the CBSA to ensure that it is in sufficient detail to convey a reasonable understanding of the substance of the information submitted in the confidential version.

If CBSA determines that an adequate non-confidential edited version *or* a non-confidential summary of information designated as confidential has not been provided by the respondent, and the respondent fails to justify why it cannot be provided, does not take corrective action or does not submit a revised version, the CBSA will **NOT** use the confidential information provided by your company in the proceedings. As a result, the CBSA's determination will be based on the best information available. It is imperative that companies delete only the minimum information necessary to protect their interests and only what is confidential.

You will find on the next page the Non-Confidential Statement that needs to be completed and attached with your non-confidential edited version or non-confidential version.

## NON-CONFIDENTIAL STATEMENT

Nature of Information Deleted in the Non-confidential Version and Reasons for Designating Information as Confidential

[Note: this document should be reproduced, completed and signed on the letterhead of your company or of your counsel.]

### Section 1 – Answers to the RFI

- A) Explain briefly the nature of the confidential information removed in your non-confidential version response to the RFI (i.e., name of customers, sales value, sales volume etc.).

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- B) Reasons why you request that the information be treated confidential

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### Section 2 – Appendices, Attachments and Supporting Documents

- A) Explain briefly the nature of the confidential information in Appendices, attachments and supporting documents, removed in your non-confidential version response (i.e. sales & costing data, transaction documentation, financial statements etc.).

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- B) Reasons why you request that the information be treated confidential.

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I, \_\_\_\_\_, \_\_\_\_\_ of \_\_\_\_\_  
(Print name) (Print Position) (Print name of company)

Signed: \_\_\_\_\_

## PART G - Request for Information Checklist

To be submitted with your response to the RFI

Please respond to each of the following questions by placing a checkmark in the “yes” or “no” column. **If a response is no**, provide an explanation as to why you have not complied with the instructions.

<b>Question 1:</b>	<b>Yes</b>	<b>No</b>	
Did you provide a confidential and non-confidential version of your response in accordance with the disclosure instructions in the Request?	<input type="checkbox"/>	<input type="checkbox"/>	If no, reason:
<b>Question 2:</b>	<b>Yes</b>	<b>No</b>	
Did you complete the Non-Confidential Statement for designating information as confidential?	<input type="checkbox"/>	<input type="checkbox"/>	If no, reason:
<b>Question 3:</b>	<b>Yes</b>	<b>No</b>	
Did you bracket or shade the confidential information in the confidential response?	<input type="checkbox"/>	<input type="checkbox"/>	If no, reason:
<b>Question 4:</b>	<b>Yes</b>	<b>No</b>	
Did you place empty brackets or shade area where information was omitted from the non-confidential version?	<input type="checkbox"/>	<input type="checkbox"/>	If no, reason:
<b>Question 5:</b>	<b>Yes</b>	<b>No</b>	
Is your response, submitted on CD or DVD, numbered consecutively from start to finish, including appendices and attachments?	<input type="checkbox"/>	<input type="checkbox"/>	If no, reason:

## PART H - Certificate of Veracity, Accuracy, and Completeness

[Note: this certificate should be reproduced and signed on your company's letterhead.]

I, \_\_\_\_\_, \_\_\_\_\_ of \_\_\_\_\_  
(Print name) (Print Position) (Print name of company)

certify that the information submitted to the CBSA in response to the Request for Information of (DATE) is TRUE, ACCURATE, and COMPLETE.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone number of signatory: \_\_\_\_\_

Fax number of signatory: \_\_\_\_\_

Address of signatory: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**This appendix is in reference to question B7 of the RFI**

## **APPENDIX 1 – EXPORTS TO CANADA**

Refer to the “Format of Information Submitted” guidelines in this RFI for instructions when providing electronic information.

Please refer to the electronic Excel® file **OCTG II Exp RFI – Appendix 1.xlsx** included with this RFI for completion of this Appendix.



**This appendix is in reference to question C6 of the RFI**

## **APPENDIX 2 - SELECTION OF LIKE GOODS**

Refer to the “Format of Information Submitted” guidelines in this RFI for instructions when providing electronic information.

Please refer to the electronic Excel® file **OCTG II Exp RFI – Appendix 2.xlsx** included with this RFI for completion of this Appendix.

**This appendix is in reference to questions C7 and C8 of the RFI.**

### **APPENDIX 3 - DOMESTIC SALES**

Refer to the “Format of Information Submitted” guidelines in this RFI for instructions when providing electronic information

Please refer to the electronic Excel® file **OCTG II Exp RFI – Appendix 3.xlsx** included with this RFI for completion of this Appendix.

**This appendix is in reference to questions D22 to D29 of the RFI**

## **APPENDIX 4 - TOTAL COST OF GOODS**

Refer to the “Format of Information Submitted” guidelines in this RFI for instructions when providing electronic information.

The costing information requested in **Appendix 4** should be presented in a format that includes all costs and is reconcilable to your company’s own financial records. The suggested format may be modified to conform to your own financial records.

**1<sup>st</sup> database – Appendix 4(a) “Total Cost of Goods - Export Shipments to Canada”**

**2<sup>nd</sup> database – Appendix 4(b) “Total Cost of goods - Domestic Sales of Subject Goods”**

Please refer to the electronic Excel® file **OCTG II Exp RFI – Appendix 4.xlsx** included with this RFI for completion of this Appendix.

## Column Descriptions for Appendices

The column names specified in the following summary must be used in your Excel files submitted to the CBSA. If some of these columns are not applicable, exclude them from your spreadsheet, prepare an explanation, and attach it to your response.

In any column which requests dates, present the information using the YYYY-MM-DD format (example, May 12, 2013 would be indicated as 2013-05-13).

COLUMN NAME	DESCRIPTION
<b>Actual Weight</b>	Indicate the actual weight of the product in metric tonnes.
<b>Administrative and Selling Expenses</b>	The amount of administrative and selling expenses that is directly or indirectly attributable to the sale and production of the goods on a per unit basis. (See question D24 for additional information).
<b>Coating</b>	Indicate whether the product is coated and the type of coating (e.g. premium corrosion or wear-resistant coatings; carbon zirconium, phenol, epoxy, or resin based coatings).
<b>Cost of Labour</b>	Report the labour cost on a per unit basis of production, including overtime pay, fringe benefits, and payments for social programs. For additional guidance, see question D22.
<b>Cost of Material</b>	Report the cost(s) of the raw material inputs for the model on a per unit basis of production. For additional guidance, see question D22.
<b>Cost of Overhead</b>	Report the factory overhead expenses on a per unit basis of production of the goods. For additional guidance, see question D22.
<b>Currency</b>	Indicate the currency of settlement for the sale.
<b>Customer Name</b>	Indicate the name of the customer.
<b>Customer Number</b>	Indicate the number used to identify the customer in your computer records.
<b>Date of Sale</b>	Indicate the date of sale (refer to the definition in Part E - Glossary). Generally the date of acknowledgment of the customer's order, when material terms are finalized (generally the order confirmation date).
<b>Date of Shipment</b>	The date the goods were shipped (i.e. the date the product left your factory/warehouse).
<b>Date Paid</b>	The date your company received payment for the goods.

<b>Duty</b>	The amount included in the selling price for Canadian customs duties and Canadian taxes.
<b>End Finish</b>	Indicate the type of end finishing of the pipe. Common finishes include but are not limited to: <ul style="list-style-type: none"> <li>• Plain end (PE);</li> <li>• External upset ends (EUE);</li> <li>• Buttress-threaded and coupled (BTC);</li> <li>• Short-threaded and coupled (STC);</li> <li>• Long-threaded and coupled (LTC); and</li> <li>• Premium/proprietary connections (PC) – provide full details</li> </ul>
<b>Export Tax</b>	Any applicable export tax which is included in the export selling price.
<b>Extended Selling Price</b>	The full invoice value of the goods. This value should be the extended value of the quantity multiplied by the unit-selling price.
<b>Factory</b>	The name and location of the production facility or factory where the product was produced.
<b>Freight</b>	The amount of <i>inland freight</i> charges that your company incurred that is <i>included</i> in the selling price of the goods.
<b>Gauge (nominal weight)</b>	Indicate the nominal weight of the product in either pounds per foot (lbs/ft) or kilograms per meter (kgs/meter).
<b>Grade</b>	Indicate the grade of the product (e.g. L80, P110). If grade is proprietary, identify also the closest standard equivalent as per the API 5CT specification.
<b>Inland Freight</b>	The amount of inland freight charges that your company incurred that is <i>included</i> in the selling price of the goods. These are generally the charges from the factory to the port of shipment.
<b>Insurance</b>	The amount included in the selling price for insuring the goods during shipment to the customer's premises.
<b>Invoice Date</b>	Indicate the invoice date.
<b>Invoice Number</b>	Indicate the invoice number.

<b>Length</b>	<p>Indicate the length range of the OCTG as per the API 5CT Specification, i.e.:</p> <ul style="list-style-type: none"> <li>• Range 1 casing 16-25 feet;</li> <li>• Range 2 casing 25-34 feet;</li> <li>• Range 3 casing 34-48 feet;</li> <li>• Range 1 tubing 20-24 feet;</li> <li>• Range 2 tubing 28-32 feet.</li> </ul>
<b>Manufacturer</b>	If your company did not manufacture the product, indicate the name of the manufacturer of the product
<b>Model Number</b>	The product number or code assigned by your company to the product sold.
<b>Net Interest Expense</b>	Report the net interest expense incurred on a per unit basis. An amount for net interest expense for each model may be found in your response to question D25.
<b>Net Price</b>	Extended selling price less all costs/charges/discounts, etc.
<b>Net Unit Price</b>	Net price divided by quantity.
<b>Ocean Freight</b>	The amount of all other freight charges included in the selling price of the model. These include ocean freight, port charges, container freight charges, <i>dock charges</i> , warehousing, insurance, <i>bank charges</i> , brokerage fees, model packaging or coating and any other export charges incurred.
<b>Other Discounts</b>	The amount for any other discounts granted.
<b>Other Expenses</b>	Report all other expenses that are directly or indirectly attributable to the production and sale of the goods on a per unit basis. For additional guidance see question D26.
<b>Other Items</b>	This column is for any other charges or benefits (price reductions). Each charge or benefit should be given its own column. Specify the amount, and provide a separate, narrative description of each item to permit a thorough understanding by CBSA officials.
<b>Other Price Adjustments</b>	Report any other price adjustments not already captured in earlier discounts & allowances.

<b>Other Production Costs</b>	Report any other production costs (not included in the previous 3 columns) on a per unit basis. Such costs should include elements for research and development. (For additional guidance, see question D22).
<b>Outside Diameter</b>	Indicate the outside diameter of the product in inches.
<b>Payment Terms</b>	The terms of payment (e.g. 2% 10 net 30 days).
<b>Place of Direct Shipment</b>	The place from where the goods were shipped directly to the importer/customer.
<b>Product Type</b>	Indicate the type of product as either: <ul style="list-style-type: none"> <li>- Seamless casing</li> <li>- Seamless tubing</li> <li>- Welded casing</li> <li>- Welded tubing</li> <li>- Green Tube</li> </ul>
<b>Prompt Payment Discount</b>	The amount of the discount for prompt payment.
<b>Purchase Order Date</b>	Insert the date of your customer's purchase order. (YYY-MM-DD)
<b>Purchase Order Number</b>	Insert the purchase order number.
<b>Rebates and Allowances</b>	The amount of any rebates and/or allowances granted.
<b>Region</b>	The region, state, province or territory in which the customer is located within the country of export.
<b>Related (Yes/No)</b>	Indicate whether your company is related to the customer. Refer to the Glossary for additional clarification.
<b>Taxes</b>	The amount of any domestic taxes included in the selling price (not fully refundable in the case of export).
<b>Terms of Sale</b>	Indicate whether the goods were sold on a CIF, FOB ex-factory, FAS basis, etc.
<b>Theoretical Weight</b>	Indicate the theoretical weight of the product in metric tonnes.

<b>Total Unit Cost of the Product</b>	Report the total cost of the model on a per unit basis. For each model, this will be the sum of all of the components of cost as detailed in the preceding columns in Appendix 4. For additional guidance see question D30.
<b>Trade Level</b>	Indicate the level of trade of your domestic customer. (e.g. distributor, end-user).
<b>Unit Selling Price</b>	The unit-selling price of the model recorded on the invoice (converted to per metric tonne if necessary).
<b>Warehouse</b>	The amount included in the selling price for expenses incurred in warehousing the goods while en route to the customer.
<b>Year-end Adjustments</b>	Report all expected year-end adjustments on a per unit basis. For additional guidance see question D28.