



Anti-subsidy Questionnaire for Turkish Producers

Case AS0022: Optical fibre cables exported from the People's Republic of China

Period of Investigation (POI):	1 January 2021 to 31 December 2021
Injury period:	1 January 2018 to 31 December 2021
Deadline for response:	30 January 2023
Contact details:	AS0022@traderemedies.gov.uk
Completed on behalf of:	Türk Prysmian Kablo

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

- Confidential
 Non-confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annexes. Please note that you will have to provide **Confidential** and **Non-Confidential** versions of the questionnaire and annexes, as well as of any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **30 January 2023**.



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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry.

The TRA is responsible for investigating the allegation that optical fibre cables from the People's Republic of China (PRC) are causing injury to producers in the UK because the goods have benefited from a subsidy from a foreign authority.

Why should I take part?

We are asking Turkish producers to complete this questionnaire to help us:

- Understand costs and manufacturing for this product
- Compare the data against figures from the PRC

We need to establish whether the alleged subsidisation has occurred and has caused injury to the UK industry so that we can assess whether a measure is needed.

Please refer to our online guidance to understand more about [how we carry out a subsidy investigation](#).

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by **30 January 2023**. We may send a notice asking for clarification or supplementary information where necessary. Make sure you provide the sources for any information or data you don't own and clearly state any restrictions on sharing it.

Where can I find more information?

Our [trade remedies guidance](#) provides more information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at: AS0022@traderemedies.gov.uk. For general information about trade remedies processes, please see our [online guidance](#).



The TRA carries out investigations under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (as amended)* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire

If you think you won't be able to complete the questionnaire within the required time, please contact the [Case Team](#) ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire by the due date. We will publish the non-confidential version on the public file to ensure there is transparency in our processes.

Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may not be able to use the information you give us.



All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems.

The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/case/AS0022/.

How to complete this questionnaire

All statements should be substantiated with relevant data, information and the sources of these. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all your supporting documents, including any calculations made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, ‘year’ or ‘calendar year’ refers to the period 1 January – 31 December and ‘quarter’ refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.



- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, AS0022, in any correspondence with the TRA.

What happens next

Once you have completed your questionnaire responses including the corresponding annex, please upload confidential and non-confidential versions along with any additional documents you're providing through our [Trade Remedies Service](#).

Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required; and
- the non-confidential responses will be placed on the public file.

For further information please refer to our guidance on [how we carry out a subsidy investigation](#).

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may contact you again to carry out a verification process. If we need to verify information that you provide, the Case Team will contact you to arrange this.

The scope of this investigation

Goods concerned

This investigation covers optical fibre cables exported from the PRC, described as:

Single mode optical fibre cables, made up of one or more individually sheathed fibres, with protective casing, whether or not containing electric conductors. Hybrid cables, which are fitted both with optical fibres and electrical conductors, fall within the product scope of the investigation.

These optical fibre cables are currently classifiable within the following commodity code: 85447000. This commodity code is given for information only.

The following products included under commodity code 85447000 are excluded from the scope of the investigation:



- (i) Multimode optical fibre cables.
- (ii) Cables in which all the optical fibres are individually fitted with operational connectors at one or both extremities; and
- (iii) cables for submarine use – cables for submarine use are plastic insulated optical fibre cables, containing a copper or aluminium conductor, in which fibres are contained in metal modules.

The goods that match the description above and are exported from the PRC into the UK are referred to as ‘the goods concerned’.

Any other goods matching the description above but produced elsewhere (including the Republic of Türkiye) are described as ‘like goods’. Any reference to ‘like goods’ in this questionnaire refers to the goods described above, regardless of the commodity code under which they are exported.

Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

Description	Value	Comments
Type of single mode optical fibre in the cable	A	Type G.652D https://www.itu.int/itu-t/recommendations/rec.aspx?rec=13076
	B	Type G.657 A1 https://www.itu.int/itu-t/recommendations/rec.aspx?rec=13078
	C	Type G.657 A2 https://www.itu.int/itu-t/recommendations/rec.aspx?rec=13078
	D	Type G.654 https://www.itu.int/itu-t/recommendations/rec.aspx?rec=14198
	E	Other types of single mode optical fibre
Number of fibres in the cable	NNNN	An optical fibre cable with 48 fibres would be marked as 00048
First (innermost) cable jacket	A	polyethylene (PE) + embedded radial strength member (RSM)



	B	polyethylene (PE) sheath
	C	Halogen Free Flame Retardant (HFFR)
	D	Other type of jacket

By way of example, for a single-mode fibre of type G.657 A2, with 96 fibres, and an innermost polyethylene (PE) sheath jacket, the PCN would be C00096B.

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table above.

Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

The PCN structure covers most of the differences between the type of optical fibre cables.

Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:

- Categorisation of features
- Number of Products included under "Other" which may exclude a fair comparison
- Specialised products which may unduly influence the comparison

Türk Prysmian Kablo agrees with the proposed PCN structure.



SECTION A: Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Legal name of company:	Turk Prysmian Kablo ve Sistemleri A.S.
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited company
Year of establishment:	1964
Other operating names:	
Company Registration Number:	23252
Registered Address:	Omerbey Mah. Bursa Asfaltı Cad. No:51 Mudanya Bursa 16941 Turkey
Name (point of contact):	[Confidential information – Personal information removed]
Position:	[Confidential information – Personal information removed]
Address:	Omerbey Mah. Bursa Asfaltı Cad. No:51 Mudanya Bursa 16941 Turkey
Telephone No:	[Confidential information – Personal information removed]
Email:	[Confidential information – Personal information removed]
Website:	https://tr.prysmiangroup.com/

2. Please complete A1 – Organisational structure, A2 – Owners & Shareholders, A3 – Your company's products, Annex II.



SECTION B: Costs

1. Describe each stage of the production process of the like goods as produced and sold by your company. To support this, please attach a complete flowchart of the production cycle.

The manufacture of OFC can be summarised in 5 steps:

- 1. Fibre colouring, during which ink is applied to the fibre for identification purposes*
- 2. The tubing process, during which a tube is placed around one or more fibre for protection*
- 3. The stranding process, during which the tubes are placed together to create a cable core*
- 4. The sheathing process, during which extra protection is placed around the cable*
- 5. Testing, during which the OFC is measured to the required specifications*

Appendix reference:

2. Within your company, do you use any integrated processes in the production of the like goods? If so, please explain.

Türk Prysmian Kablo is not a vertically integrated company. It, however, uses the optical fibres produced by **[Confidential business information]**

Appendix reference:

3. Describe the main inputs to the production process and whether the supplier is associated or not. Specify whether these input materials or parts were imported, and whether the input value includes import charges and indirect taxes (for both exported and domestic types).



Türk Prysmian Kablo uses the optical fibres produced by **[Confidential business information]**. There are no import duties, delivery charges or other indirect taxes when importing the fibres from **[Confidential business information]**.

Appendix reference:

4. Please complete B1 – CTM, Annex II.

Please see attached.

[Confidential business information]

Appendix reference:

5. Please complete B2 - RM And Input Purchases, Annex II.

[Confidential business information]

6. Please provide an invoice and any supporting documents for two of your fibre purchases stated within Annex II, Raw Material Purchases. Use the box below to give an overview of any supporting documents provided.

Please see Annexes B.6.1, B.6.2 and B.6.3 for invoices concerning fibre purchases. For the main other raw materials, see Annexes B.6.4 and B.6.5 (aramid yarn); Annexes B.6.6 and B.6.7 (polyethylene); and Annex B.6.8 (fire retardant polyester).

Appendix reference: Annexes B.6.1 -, B.6.8

7. Please provide a lease agreement / invoice and any supporting documents for land use during the POI (1 January 2021 – 31 December 2021). Use the box below to give an overview of any supporting documents provided.

The land in Mudanya (Turkey) on which the manufacturing plant is located is **[Confidential business information]**

Appendix reference:

8. Please provide an invoice and any supporting documents for your gas and electricity costs during a month of the POI (1 January 2021 – 31 December



2021). Use the box below to give an overview of any supporting documents provided.

Please see attached.

Appendix reference: [Annexes B.8.1 to B.8.4.](#)

9. If available, please provide a copy of a contract for export credit insurance relevant to exports during the POI (1 January 2021 – 31 December 2021). Use the box below to give an overview of any supporting documents provided.

N/A

Appendix reference: