January 20, 2016

Re: Petition for the Imposition of Antidumping and Countervailing Duties on Imports of Certain Amorphous Silica Fabric from the People's Republic of China

Dear Secretary Pritzker and Secretary Barton:

On behalf of Auburn Manufacturing, Inc. ("AMI" or "Petitioner"), we respectfully submit to the U.S. Department of Commerce (the "Department") and the U.S. International Trade Commission (the "Commission") the enclosed petition for the imposition of antidumping and countervailing duties on imports of Certain Amorphous Silica Fabric from the People's Republic of China. AMI is a manufacturer or producer in the United States of a domestic like product and thus is an interested party within the meaning of 19 U.S.C. § 1677(9)(C).
investment in that proceeding was defined as "commercial grade woven fabric of glass (silica filaments), whether or not colored, containing not over 17 percent of wool by weight."\textsuperscript{16} The Department included only "commercial" grade ASF (\textit{i.e.}, what is now described in the industry as "industrial" grade ASF) in the scope of its investigation and the Commission found that the like product included only commercial grade (\textit{i.e.}, what is now known as "industrial" grade) ASF.\textsuperscript{17}

E. Scope Of The Investigations And A Detailed Description Of The Subject Merchandise (19 C.F.R. § 351.202(b)(5))

1. Scope of the Investigation

The product covered by this petition is woven, industrial grade ASF, for which the base fabric contains at least 90 percent silica (SiO$_2$) by weight, regardless of other materials contained in the fabric, regardless of whether in rolled form or cut-to-length, regardless of weight, width (except for ASF tape, as discussed below), or length, regardless of whether the fabric is colored, regardless of whether the fabric is coated or treated, regardless of whether the fabric is heat-cleaned, regardless of whether the product is approved by a standards testing body (such as being Factory Mutual ("FM") approved),\textsuperscript{18} or regardless of whether it meets any governmental

\textsuperscript{16} 52 Fed. Reg. at 28,034. Based on our understanding, the language "containing not over 17 percent of wool by weight" was added to indicate that the product was not subject to the textile agreement. See Schedule 3 Headnote, Subsection 9, page 3-3 of the Tariff Schedules of the United States Annotated (1987). However, it is unknown why this reference was used considering that the ASF is made from man-made fiberglass fibers. Although the 1987 investigation used the term "commercial" grade ASF as the counterpart to aerospace grade ASF, since that time, standard terminology in the ASF industry has changed, such that what was previously referred to as "commercial" grade ASF is now described as "industrial" grade ASF. AMI makes a product that it refers to as "commercial" grade ASF, but now uses the term "commercial" grade to refer to product that does not meet the military specification.

\textsuperscript{17} USITC Pub. 2015, at 6.

\textsuperscript{18} Factory Mutual offers worldwide industrial and commercial product certification and testing services. Recognized and respected across the globe, the FM APPROVED mark is backed by
specification. Although industrial grade ASF typically contains a minimum of 96 percent silica (as per U.S. Military Specification MIL-C-24576A), which is in the “amorphous,” or noncrystalline, state, certain high temperature silica fabric, with 90 percent silica or above, is covered by the scope of this petition. AMI believes that certain Chinese producers are exporting unfairly traded ASF with a silica content as low as 90 percent that directly competes with the ASF produced by AMI. For ease of reference, industrial grade ASF, with a minimum of 90 percent silica or above, is referred to as “industrial grade ASF.”

Industrial grade ASF may be coated or treated with materials that include, but are not limited to, oils, vermiculite, acrylic latex compound, silicone, aluminized polyester (Mylar®) film, pressure-sensitive adhesive, or other coatings and treatments. All coated and treated industrial grade ASF is included within the scope of the petition. Industrial grade ASF may also be produced in various colors. All industrial grade ASF, regardless of whether it is colored, is within the scope of the petition.

Industrial grade ASF may come in rolls or may be cut-to-length and then further fabricated to make welding curtains, welding blankets, welding pads, or fire blankets. Welding pads are heat-resistant ASF fabrics that have been cut-to-length and are designed to be placed directly under a hot work operation, such as welding or cutting. Welding pads are intended for use in horizontal applications with severe exposures such as those resulting from molten substances or heavy horizontal welding. Welding blankets are a heat resistant fabric designed for scientific research and testing, and assures customers that products conform to the highest national standards. See http://www.fmglobal.com/page.aspx?id=50000000. A copy of this webpage is provided as Exhibit I-5.

19 Full descriptions of the terms “welding pads,” “welding blankets,” and “welding curtains” can be found at http://www.auburnmfg.com/uploads/NFPA51B.pdf. A printout of this webpage is provided as Exhibit I-6. See also https://www.youtube.com/watch?v=hmnOIMWVsyg.
to be placed in the vicinity of a hot work operation. Welding blankets are intended for use in horizontal applications with light to moderate exposures such as those resulting from chipping, grinding, heat treating, sand blasting, and light horizontal welding. Welding curtains are a heat resistant fabric designed to be placed in the vicinity of a hot work operation. Welding curtains are intended for use in vertical applications with light to moderate exposures such as those resulting from chipping, grinding, heat treating, sand blasting and light horizontal welding.

Welding pads, welding blankets, welding curtains, and fire blankets can have further fabrication other than cutting them to length, such as grommeting or finishing edges. Regardless of the name, all industrial grade ASF that has been further cut-to-length or cut-to-width (except if the final nominal width is 8 inches or less) and further finished by finishing the edges and/or adding grommets, is covered by the scope of this petition.

Industrial grade ASF is produced from fiberglass fabric. The difference between fiberglass fabric and industrial grade ASF is that the fiberglass fabric has a higher percentage of elements other than silica. In order to produce industrial grade ASF from fiberglass fabric, fiberglass cloth is leached in an acid bath over several hours to remove the unwanted elements. The resulting industrial grade ASF has a minimum silica content of at least 90 percent. In order to prevent possible circumvention, the scope also includes (1) any industrial grade ASF that has been converted (i.e., leached) into industrial grade ASF in China from fiberglass cloth produced in a third country; and (2) any industrial grade ASF produced in China that has been further processed in a third country prior to export to the United States, including but not limited to

---

20 The trade sometimes refers to these products as fire curtains, fire blankets, fire pads, or fire screens. Regardless of the name, industrial grade ASF that has been cut-to-length and then further finished, by finishing the edges and/or adding grommets, is included within the scope of these petitions.
treated, coating, slitting, cutting to length, cutting to width, finishing the edges, adding
grommets, or any other processing that would not otherwise remove the merchandise from the
scope of the investigations if performed in the country of manufacture of the in-scope industrial
grade ASF.

Excluded from the scope of the petition is ASF that is subjected to controlled shrinkage.
The industry often refers to this type of material as being “pre-shrunk” or “aerospace grade”
ASF. Controlled shrinkage or pre-shrinkage prevents a fabric from shrinking after production
and is typically used in aerospace applications in which limiting shrinkage to a minimal amount
is critical. In order to be excluded as a pre-shrunk or aerospace grade ASF, the ASF must meet
the following exclusion criteria: (1) the ASF must contain a minimum of 98 percent silica (SiO₂)
by nominal weight; (2) the ASF must have an areal shrinkage of 4 percent or less; (3) the ASF
must contain no coatings or treatments; and (4) the ASF must be white in color. For purposes of
this scope, “areal shrinkage” refers to the extent to which a specimen of ASF shrinks while
subjected to heating at 1800 degrees F for 30 minutes. Areal shrinkage is expressed as the
following percentage:

\[
\frac{\text{Fired Area, cm}^2 - \text{Initial Area, cm}^2}{\text{Initial Area, cm}^2} \times 100 = \text{Areal Shrinkage, } \% 
\]

Also excluded from the scope are ASF rope, tubing (or sleeving), and tape. ASF rope is a
knitted or braided product made into rope from amorphous silica yarns. Silica tubing (or
sleeving) is braided into a strong and flexible hollow sleeve from amorphous silica yarns. ASF
tape is either woven or slit from ASF and may have an adhesive backing applied. ASF tape
cannot exceed 8 inches in nominal width, and is therefore outside the scope because the scope
includes only product with a nominal width in excess of 8 inches. Finally, all heat-resistant
clothing is excluded from the scope of this petition.
AMI believes that the Commission should find the domestic like product to be co-extensive with the scope of this petition. The suggested like product is essentially the same as the domestic like product defined by the Commission in its previous investigation concerning Certain Silica Filament Fabric from Japan. In that investigation, the Commission determined that the differences in characteristics and uses between the industrial grade and the aerospace grade required the like product to include only the industrial grade product.\(^{21}\) Therefore, in this investigation, the Commission should find that the domestic like product is co-extensive with the scope of this petition and to exclude aerospace grade ASF from the domestic like product.

2. Proposed Written Description of the Scope

The following is the proposed written description of the scope of the petition:

The product covered by this petition is woven, industrial grade amorphous silica fabric ("ASF"), which contains a minimum of 90 percent silica (SiO\(_2\)) by nominal weight, and a nominal width in excess of 8 inches. The petition covers industrial grade ASF regardless of other materials contained in the fabric, regardless of whether in roll form or cut-to-length, regardless of weight, width (except as noted above), or length. The petition covers industrial grade ASF regardless of whether the product is approved by a standards testing body (such as being Factory Mutual ("FM") Approved),\(^{22}\) or regardless of whether it meets any governmental specification.

Industrial grade ASF may be produced in various colors. The petition covers industrial grade ASF regardless of whether the fabric is colored. Industrial grade ASF may be coated or treated with materials that include, but are not limited to, oils, vermiculite, acrylic latex compound, silicone, aluminized polyester (Mylar\(^{\circledR}\)) film, pressure-sensitive adhesive, or other coatings and treatments. The petition covers industrial grade ASF regardless of whether the

\(^{21}\) USITC Pub. 2015, at 6.

\(^{22}\) Factory Mutual offers worldwide industrial and commercial product certification and testing services. Recognized and respected across the globe, The FM APPROVED mark is backed by scientific research and testing, and assures customers that products conform to the highest national standards. See http://www.fmglobal.com/page.aspx?id=50000000. See Exhibit 1-5.
Fabric is coated or treated. Industrial grade ASF may be heat-cleaned. The petition covers industrial grade ASF regardless of whether the fabric is heat-cleaned.

Industrial grade ASF may be imported in rolls or may be cut-to-length and then further fabricated to make welding curtains, welding blankets, fire blankets, fire pads, or fire screens. Regardless of the name, all industrial grade ASF that has been further cut-to-length or cut-to-width or further finished by finishing the edges and/or adding grommets, is included within the scope of this petition.

Subject merchandise also includes (1) any industrial grade ASF that has been converted into industrial grade ASF in China from fiberglass cloth produced in a third country; and (2) any industrial grade ASF that has been further processed in a third country prior to export to the United States, including but not limited to treating, coating, slitting, cutting to length, cutting to width, finishing the edges, adding grommets, or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the in-scope industrial grade ASF.

Excluded from the scope of the petition is ASF that is subjected to controlled shrinkage, which is also called “pre-shrunk” or “aerospace grade” ASF. In order to be excluded as a pre-shrunk or aerospace grade ASF, the ASF must meet the following exclusion criteria: (1) the ASF must contain a minimum of 98 percent silica (SiO₂) by nominal weight; (2) the ASF must have an areal shrinkage of 4 percent or less; (3) the ASF must contain no coatings or treatments; and (4) the ASF must be white in color. For purposes of this scope, “areal shrinkage” refers to the extent to which a specimen of ASF shrinks while subjected to heating at 1800 degrees F for 30 minutes.²³

Also excluded from the scope are ASF rope and tubing (or sleeving). ASF rope is a knitted or braided product made from amorphous silica yarns. Silica tubing (or sleeving) is braided into a hollow sleeve from amorphous silica yarns.

²³ Areal shrinkage is expressed as the following percentage:

\[
\text{Areal Shrinkage, %} = \left( \frac{\text{Fired Area, cm}^2 - \text{Initial Area, cm}^2}{\text{Initial Area, cm}^2} \right) \times 100
\]
The subject imports are normally classified in items 7019.59.4021, 7019.59.4096, 7019.59.9021, and 7019.59.9096 of the Harmonized Tariff Schedule of the United States ("HTSUS"), but may also enter under HTSUS items 7019.90.1000 or 7019.90.5050. HTSUS subheadings are provided for convenience and customs purposes only; the written description of the scope of these investigations is dispositive.

3. Technical Characteristics and Uses

Industrial grade ASF is a woven textile product composed of numerous fine, discrete silica strands. The product typically contains a minimum of 96 percent silica, which is in the "amorphous," or noncrystalline, state, but may range as low as 90 percent silica.24

Industrial grade ASF possesses a combination of chemical and physical properties, including thermal survivability, low thermal conductivity, chemical non-reactivity, flexibility, strength, abrasion resistance, and ease of handling. These properties make it useful in a number of industrial applications, especially to insulate and resist extreme heat.

The thermal insulation characteristics of industrial grade ASF cover a wide range of temperatures. Specifically, industrial grade ASF is capable of withstanding heat up to 1,800°F. without sacrificing any of its other properties and will remain in usable cloth form up to approximately 2,300°F., albeit with some loss of flexibility. Industrial grade ASF will continue to provide some protection up to its melting point over 3,000°F.

Most industrial grade ASF is manufactured in two weights, lightweight (i.e., 18 ounces per square yard) and heavyweight (i.e., 36 ounces per square yard), but may also include other

24 For example, importer AFG-USA imports ASF with silica content of 80 percent, 96%, and 98.5%. See http://www.afg-usa.com/pages/1715995/fiberglass-silica-fabrics.aspx. A copy of this webpage is provided as Exhibit I-7. To the best of AMI’s knowledge, ASF with silica content of 80 percent, however, would not provide effective temperature resistance for known applications of industrial grade ASF. The Chinese producer MOWCO produces a high temperature ASF that has a minimum silica content of 94%. See http://www.welding-fabrics.com/high-silica-texturized-fabrics.html. A copy of this webpage is provided as Exhibit I-8.
weights, including a medium weight (i.e., 24 ounces per yard). There are also a number of topical coatings and treatments that may be requested by the customer to enhance the product’s characteristics for specialized uses. These coatings include, but are not limited to, neoprene or silicone for water repellency and greater abrasion resistance, chrome compounds to maintain flexibility at particularly high temperatures, and aluminizing to increase heat reflectivity.

Industrial grade ASF is made predominantly in 36-inch, 48-inch, and 60-inch widths, but may also be produced in other widths.

Industrial grade ASF is used to insulate and to resist extreme heat so as to conserve energy and protect people, materials, and machinery from potential injury or damage. Some specific applications of industrial grade ASF are as shields for ducting and pipes, as protection from sparks and molten metal splash, as insulating blankets in heat-treating and high-temperature processing operations, and as refractory lining and furnace curtains.

4. Production Process

There are five major processing steps involved in the production of the basic ASF for most producers, who are likely to begin with fiberglass yarn. However, it is possible that there may be an integrated producer, such as CPIC, whose production process begins with the production of fiberglass yarn.

For an integrated producer of ASF, the manufacturer must first make or source fiberglass yarn. Fiberglass yarn production begins with a process called “pultrusion.” The manufacturing process for glass fibers suitable for reinforcement uses large furnaces to gradually melt the silica sand, limestone, kaolin clay, fluorspar, colemanite, dolomite, boron, and other minerals to liquid form. It is then extruded through bushings, which are bundles of very small orifices. These filaments are then sized (i.e., coated) with a chemical solution. The individual filaments are bundled in large numbers to provide a roving (e.g., a soft strand of fiber that has been twisted,
attenuated, and freed of foreign matter preparatory to its conversion into yarn). The diameter of the filaments, and the number of filaments in the roving, determine its weight, expressed in one of two measurement systems (i.e., tex\textsuperscript{25} or cotton count). Fiberglass can then be formed into yarn much like wool or cotton.

For the vast majority of Chinese producers (i.e., non-integrated producers), the following is a description of each stage of production.

\textbf{a. Yarn Preparation}

Before the yarn can be woven, it must be prepared through various processes. Warp yarn used in the weaving process is first treated with a finish to facilitate the weaving process. It is then plied with like-size yarns and then wound onto large stainless steel beams with the precise number of yarns required to weave a specific weight and width of fiberglass fabric. These beams are placed at the rear of the loom and are drawn into the machine by hand. Fill (or weft) yarn may also be plied, and then wound onto plastic bobbins. These bobbins are fed into the loom from the side. The loom is then ready to weave the base fiberglass fabric used to make ASF.

Another yarn preparation process is called "texturizing." This process injects air into a plied yarn bundle, breaking various yarn strands, and thereby increasing the yarn diameter. These yarns are also treated with a finish to facilitate the weaving process. Texturized yarns are then either wound onto beams or bobbins.

\textbf{b. Weaving}

Weaving occurs by means of automated looms. The yarn fed into the weaving process may be pulled from one of several different sources. Specifically, yarn may be drawn from bobbins on creels. Alternatively, warp yarn may be drawn from sectional beams (AMI uses

\textsuperscript{25} "Tex" is a unit of measure for the linear mass density of fibers, yarns and thread and is defined as the mass in grams per 1000 meters.
[†], with one bobbin to string a strand of weft or fill yarn cross-sectionally. Finally, warp yarn may be drawn from a warp beam, similarly with one bobbin used to string a strand of weft or fill yarn cross-sectionally. The cloth may be woven in various patterns, and may be woven to different widths. Standard widths are 60 inches and 36 inches. Most of the material produced by AMI is 36 inches, which is also the standard width in the industry. The woven cloth is woven with a selvage edge. Beyond the selvage are ends of weft or fill yarns that must be trimmed. The process involves cutting off a small strip at the edge of the cloth and weaving of material at the edge of the cloth to prevent fraying. The edge trimming, to the best of AMI’s knowledge, has no scrap value, and therefore is treated as waste material. The finished cloth is wound onto a cardboard core, and then cut, for delivery to the next processing stage. The woven cloth at this stage is white.\(^{26}\)

c. Heat Cleaning

At the heat cleaning stage, the cloth is unwound and run through a heat-cleaning oven at a temperature of approximately 1300 degrees Fahrenheit. Through the heat cleaning process, the starches and oils present on the cloth are removed.\(^{27}\) The cloth is rewound at the end of this stage, using a specifically designed PVC core containing holes. After finishing this process, the woven cloth is a light brown color. AMI believes that it is possible that some Chinese producers may forego this stage in the production process. In order to achieve the same visual effect, producers not engaging in heat cleaning may instead coat the cloth in a vermiculite solution.

\(^{26}\) While it is possible that some Chinese producers may not perform the weaving process (that is, their production may begin with the woven fiberglass cloth), AMI believes that the largest exporters are most likely also engaging in weaving.

\(^{27}\) These starches and oils are present on the fiberglass yarn in order to facilitate the weaving process. However, after the yarn has been turned into cloth, these starches and oils are no longer necessary, and can detract from the performance of the finished product, due to smoke evolution at operating temperatures.
d. Leaching

After heat cleaning, the spool of cloth is taken to the hydrochloric acid ("HCL") vats. The spools are attached by the PVC core to a batch-dip platform that normally holds 8 spools of 36"-wide fabric. Then, the platform is submerged into an HCL bath containing an HCL solution of between 15 and 17 percent. The HCL is heated to a temperature of approximately 120 degrees Fahrenheit. The HCL solution is also pumped into the PVC core, and through pressure is forced through the holes in the core to ensure that the entirety of the spool is leached evenly. The leaching process takes approximately seven hours, with the total time dictated by the nature of the chemical processes that take place.

AMI notes that while it engages a batch process to leach its woven cloth, it is also possible to leach the woven cloth through an in-line process. Regardless, as stated, the chemical process involved dictates that the material spends approximately seven hours in the HCL solution. In terms of HCL usage, AMI believes that the in-line leaching process is likely to be less efficient as compared to the batch process. Prior to leaching, the woven cloth is approximately 55 percent silica. After the leaching process, the silica content can be 90 percent or higher, with most industrial grade ASF being at least 96 percent silica.

Prior to removing the material from the HCL vats, the spools are rinsed with water to remove the HCL. The leaching process involves storage of HCL in three separate tanks: (1) an HCL storage tank; (2) a neutralization tank; and (3) an acidic rinse water tank. In order to comply with environmental regulations, the production process at AMI incorporates a processing step at which the water is neutralized by the addition of lime prior to disposal.

---

28 AMI notes that the fiberglass yarn it purchases is normally approximately 55 percent silica. However, fiberglass yarn may range from about 50-55 percent silica.

29 AMI's ASF product is at least 96 percent silica.
e. Coating/Drying

After the spools are removed from the leaching bath, they are unspooled and run through a drying and coating machine. At this stage, the product is dried through contact with a series of steam-heated cylindrical metal “cans.” Next, the cloth runs through a trough containing an acrylic latex compound solution, which contains silicone oil. The silicone oil is applied to lubricate the material in order to prevent breakage. While AMI applies this light silicone oil coating by dipping, alternative techniques for applying the light silicone oil coating could include spraying or “kiss-rolling,” in which one side of the cloth runs over the surface of the silicone oil liquid (i.e., the cloth “kisses” the surface).

AMI notes that the abrasion resistant (“AR”) version of industrial grade ASF achieves its defining character by undergoing a second pass through the drying/coating stage, in which a heavier silicone oil coating is applied. Moreover, the AR products are often tinted a different color, which is achieved by adding a dye into the dip for the second pass. This is done to be able to differentiate easily the AR product.

ASF products are digitally printed or stenciled in accordance with military specifications, or with the proper FM Approvals markings, as described in the “Final Coatings” section below.

f. Final Coatings

Industrial grade ASF may be finished after stage four. However, if the production order demands the application of a final coating, then the material must undergo an additional production stage. Final coatings that may be applied to ASF include silicone, aluminum foil, and pressure-sensitive adhesive (“PSA”). The silicone coating used for the final coating process is not to be confused with the light silicone oil treatment at the previous stage. Rather, the silicon applied in this final coating stage is a highly viscous material that is applied to the surface of the cloth, after which the coated material is run through an oven to cure the material. Pigments are
added to the silicone coating prior to application to the cloth, to achieve the final color.

Industrial grade ASF may be silicone-coated on either one or both sides.

PSA may also be applied to industrial grade ASF, in order to firmly affix the final product to a surface. PSA is only applied on one side. Finally, aluminum foil may be applied on one side of the industrial grade ASF.\(^{30}\)

g. Labeling/Packaging

After industrial grade ASF is manufactured, it is labeled and packaged for shipment. Standard packaging includes spooling the finished product onto a cardboard core; wrapping the spool in bubble wrap, covering that with Kraft paper, and then binding the spool with three plastic binding strips. The product is then placed in a cardboard box, which also includes cardboard filler at each end of the box. For the standard 36 inch product, the boxes are loaded 12 per pallet. AMI notes that the finished product would not simply be stacked, without packaging, into a container, because the finished fabric would likely be damaged during transit.\(^{31}\)

Different industrial grade ASF may be rated by the American National Standards Institute ("ANSI") FM4950 standard, as either a welding pad, blanket, or as a curtain for hot work operations. Welding pads are a heat resistant fabric designed to be placed directly under a hot work operation, such as welding or cutting. Welding pads are intended for use in horizontal applications with severe exposures such as those resulting from molten substances or heavy

---

\(^{30}\) While aluminum foil can theoretically be applied on both sides of the cloth, AMI believes there is no current application for industrial grade ASF that would require that the product contain aluminum foil on both sides. Nevertheless, should one arise, AMI has the technical capability to produce industrial grade ASF with foil on both sides.

\(^{31}\) The surface of industrial grade ASF is highly susceptible to significant marring through casual contact. It is for this reason that the finished spools are bubble-wrapped, covered in Kraft paper, and individually boxed.
horizontal welding.\footnote{Full descriptions of the terms “welding pads,” “welding blankets,” and “welding curtains” can be found at http://www.auburnmfg.com/uploads/NPPA51B.pdf. See Exhibit I-6.} In general, welding pads have the highest ANSI/FM rating, which requires that the product have the ability to prevent any deterioration of a piece of paper placed under the product in a horizontal testing position. Welding blankets are a heat resistant fabric designed to be placed in the vicinity of a hot work operation. Welding blankets are intended for use in horizontal applications with light to moderate exposures such as those resulting from chipping, grinding, heat treating, sand blasting, and light horizontal welding. Welding blankets have the next highest ANSI/FM rating; these are tested horizontally, but the paper placed beneath the product may be browned, although not burned. Welding curtains are a heat resistant fabric designed to be placed directly in the vicinity of a hot work operation. Welding curtains are intended for use in vertical applications with light to moderate exposures such as that resulting from chipping, grinding, heat treating, sand blasting and light horizontal welding. Welding curtains have the lowest of the three ANSI/FM ratings. The test for a welding curtain is performed with the product in a vertical position only.

A separate qualification standard is Military Specification MIL-C-24576A. This specification includes requirements of ASF to determine physical properties and flame resistance. A copy of Military Specification MIL-C-24576A is provided at Exhibit I-9.

Finally, we note that the proposed scope of the investigation also includes fire blankets made from industrial grade ASF. The production process for fire blankets differs from that described above in that, after the product completes the coating/drying process described as stage four above, the ASF is subsequently cut, sewn, grommeted, and packaged in a different packing form as compared to the other ASF. Specifically, the fire blanket produced by AMI is packaged in a polyethylene wrapping, with a thin cardboard packaging label insert.
5. Tariff Classification

The subject imports are normally classified in items 7019.59.4021, 7019.59.4096, 7019.59.9021, and 7019.59.9096 of the Harmonized Tariff Schedule of the United States ("HTSUS"), but may also enter under HTSUS items 7019.90.1000 or 7019.90.5050. These statistical reporting numbers are believed to include both subject products and non-subject products. HTSUS subheadings are provided for convenience and customs purposes only; the written description of the scope of these investigations is dispositive. Copies of the pages describing the relevant HTSUS items is provided at Exhibit I-10.


The industrial grade ASF covered by this petition is manufactured in and exported to the United States from the People’s Republic of China. To the best of AMI’s knowledge, no producer makes fiberglass or silica fabric in Canada, therefore AMI suspects that any imports listed as originating in Canada may be transshipped. Petitioner does not have any evidence indicating that the subject merchandise is exported to the United States from another country other than the People’s Republic of China, other than Canada.

G. The Names and Addresses of Each Person Believed to Sell the Merchandise At Less Than Normal Value and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(i)(A))

The names and addresses of the entities believed by AMI to be producing industrial grade ASF in China and exporting subject industrial grade ASF to the United States are provided in Exhibit I-11. Information reasonably available to AMI does not allow the identification of the proportion of total exports to the United States accounted for during the most recent twelve month period by the listed producers. AMI believes, however, that the companies listed in Exhibit I-11 account for the vast majority of subject exports from China.
EXHIBIT I-11
<table>
<thead>
<tr>
<th>Company Name</th>
<th>Company Address</th>
<th>Company website</th>
<th>E-Mail Address / Fax Number</th>
<th>Company Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access China Industrial Textile (Pinghu) Inc. (&quot;ACIT&quot;)</td>
<td>288 Jufu Rd. W., Pingshu, Zhejiang, China 314203</td>
<td><a href="http://www.acit.com/">http://www.acit.com/</a></td>
<td><a href="mailto:sales@acit.com">sales@acit.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Access China Industrial Textile (Shanghai) Inc. (&quot;ACIT&quot;)</td>
<td>No. 350, Yuyang Rd., High &amp; New Tech Park, Songjiang, Shanghai, China</td>
<td><a href="http://www.acit.com/">http://www.acit.com/</a></td>
<td><a href="mailto:sales@acit.com">sales@acit.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Acmetex Co., Ltd.</td>
<td>Rm. 101, No. 88, Lane 1028, Xuyuan Rd., Pudongning, Shanghai, China</td>
<td><a href="http://www.acmetex.net/">http://www.acmetex.net/</a></td>
<td><a href="mailto:szwmo@acmetex.net">szwmo@acmetex.net</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Beijing Great Pack Materials Co., Ltd.</td>
<td>(North Of Fandu) East Of Dama Village, Old Zouhai Road, Zhanzhou, Hebei, China (Mainland)</td>
<td><a href="http://www.gdpack.com/">http://www.gdpack.com/</a></td>
<td><a href="mailto:qiaoy@esgreatpack.com">qiaoy@esgreatpack.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Beijing Landingji Engineering Tech Co., Ltd.</td>
<td>Room 201, Unit 5, Building 1, Tianhui Park, Huilongquan, Changping (Mainland)</td>
<td><a href="http://www.bldj.com.cn">http://www.bldj.com.cn</a></td>
<td><a href="mailto:qiaoy@esgreatpack.com">qiaoy@esgreatpack.com</a></td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>Beijing Tianxing Ceramic Fiber Composite Materials Corp.</td>
<td>15th Village, Xiongmen Town, Daxing District, Xingguang Community, Xiongmen Town, Daxing District, Beijing, China (Mainland)</td>
<td><a href="http://www.ceramic-fibercn.com/">http://www.ceramic-fibercn.com/</a></td>
<td><a href="mailto:ceramics@fms.cn">ceramics@fms.cn</a></td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>Changzhou Xiaoxia Fiber Glass Insulation Products Co., Ltd.</td>
<td>No. 9, No. 18, Zhiwang Rd., Tonggang Industrial Park, Meili Town, Changzhou, Jiangsu, China (Mainland)</td>
<td><a href="http://www.xiaoxia.com.cn">http://www.xiaoxia.com.cn</a></td>
<td><a href="mailto:xiaoxia@esgreatpack.com">xiaoxia@esgreatpack.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Changzhou Kingze Composite Materials Co., Ltd.</td>
<td>No. 8, No. 18, Changzhou Road, Changzhou, Jiangsu, China (Mainland)</td>
<td><a href="http://www.xiaoxia.com.cn">http://www.xiaoxia.com.cn</a></td>
<td><a href="mailto:xiaoxia@esgreatpack.com">xiaoxia@esgreatpack.com</a></td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>Changzhou Utek Composite Co.</td>
<td>1-814, Fuhanyuan, New north district, Changzhou, Jiangsu, China 213002</td>
<td><a href="http://www.uteckcomposite.com/">http://www.uteckcomposite.com/</a></td>
<td><a href="mailto:info@uteckcomposite.com">info@uteckcomposite.com</a></td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>Chengdu Chang Yuan Shu Co., Ltd.</td>
<td>C-610, Menmian Guangzheng, 1289 Middle Section Of Tianfu Avenue, Guoxin Dist., Chengdu, Sichuan, China (Mainland)</td>
<td><a href="http://www.169chem.net/">http://www.169chem.net/</a></td>
<td><a href="mailto:info@169chem.net">info@169chem.net</a></td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>Chengdu Youbang Hongui New Material Co., Ltd.</td>
<td>No. 80, Tongzi Ave., Qingshuijiang Dist., Chengdu, Sichuan, China (Mainland)</td>
<td><a href="http://www.es-ydh.com.cn">http://www.es-ydh.com.cn</a></td>
<td><a href="mailto:62071002@qa.com">62071002@qa.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>China Beiha Fiberglass Co., Ltd.</td>
<td>Beshai Industry Park, Changhong Rd 2804, Jiugiang City, Jiangxi China</td>
<td><a href="http://fiberglasschina.com/">http://fiberglasschina.com/</a></td>
<td><a href="mailto:sales@fiberglasschina.com">sales@fiberglasschina.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>China National Building Materials International Corporation</td>
<td>17th Floor, No. 4 Building, Zhuyu Business Center, Shouchuan South Road, Haidian District, Beijing, China, 100045</td>
<td><a href="http://cscp.com.cn/">http://cscp.com.cn/</a></td>
<td><a href="mailto:markerting@energy.com">markerting@energy.com</a></td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>China Yangzhou Guo Tai Fiberglass Co., Ltd.</td>
<td>Room 802, Guanghua Xingduhubuilding No. 111, Baierqiang Road, Yanzhou, Jiangsu, China (Mainland)</td>
<td><a href="http://www.fiber-fabric.com/">http://www.fiber-fabric.com/</a></td>
<td><a href="mailto:info@beijingfibre.com">info@beijingfibre.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Chongqing Polycomp International Corp. (CPIC)</td>
<td>DaDaKou District Chongqing China</td>
<td><a href="http://www.polycomp.com/">http://www.polycomp.com/</a></td>
<td><a href="mailto:info@beijingfibre.com">info@beijingfibre.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Chongqing Texway Material Corporation</td>
<td>Chongqing Chongzhou district industrial park taking home</td>
<td><a href="http://es-ydh.com.cn/">http://es-ydh.com.cn/</a></td>
<td><a href="mailto:steveyou@esgreatpack.com">steveyou@esgreatpack.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Chongqing Yanghai Import &amp; Export Trade Co., Ltd.</td>
<td>Room 27-3, Unit 3, No. 1048, Songqiao Road, Changhui Road, Dadaokou District, Chongqing, China (Mainland)</td>
<td><a href="http://www.es-ydh.com.cn/">http://www.es-ydh.com.cn/</a></td>
<td><a href="mailto:mail@yanghaiip.com">mail@yanghaiip.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Cixi Sunrise Sealing Material Co., Ltd.</td>
<td>Wuhuan Guanhuiwei Cixi City, Ningbo, Zhejiang, China (Mainland)</td>
<td><a href="http://www.sunrise-sealing.com/">http://www.sunrise-sealing.com/</a></td>
<td><a href="mailto:barbara@sunrise-sealing.com">barbara@sunrise-sealing.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Fujian Minshan Fire-Proofing Co., Ltd.</td>
<td>Tairin Village, Shengxin Town, Nanan, Quanzhou, Fujian, China (Mainland)</td>
<td><a href="http://www.minshanfire.com">http://www.minshanfire.com</a></td>
<td>Fax: 86-592-28133678</td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Guangzhou Guangqiao Fiberglass Co., Ltd.</td>
<td>Industry Park, Huangpu Town, Shangyou County, Guangzhou, Guangzhou, China (Mainland)</td>
<td><a href="http://www.hongqia.com/">http://www.hongqia.com/</a></td>
<td>Fax: 86-10-8576919</td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>Grand Fiberglass Co., Ltd.</td>
<td>Cidong Industrial Zone, Longshan Town, Cixi, Ningbo, Zhejiang, China (Mainland)</td>
<td><a href="http://www.fiberglass.cn/">http://www.fiberglass.cn/</a></td>
<td><a href="mailto:grand@fiberglass.cn">grand@fiberglass.cn</a></td>
<td>Manufacturing Trading Company</td>
</tr>
<tr>
<td>Haining Jieke Fiberglass Fabric Co., Ltd.</td>
<td>No. 16, Huajin Road, Zhoushunmiao, Haining, Jiangsu, China (Mainland)</td>
<td><a href="http://www.gd-fiberglass.cn/">http://www.gd-fiberglass.cn/</a></td>
<td><a href="mailto:gdffiberglass@foxmail.com">gdffiberglass@foxmail.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Haining Jishan Imp. &amp; Exp. Co., Ltd.</td>
<td>4F Unit B, No. 2, Jinggu Rd., Wujing Knitting Zone, Haining, Jiangsu, Zhejiang, China</td>
<td><a href="http://jishan.en.trad-in-china.com/">http://jishan.en.trad-in-china.com/</a></td>
<td></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Hebei Yama Fiberglass Manufacturing Co., Ltd.</td>
<td>Muffangying Village, Baiyanguan Township, Guangzhou County, Xinmei, Hebei, China (Mainland)</td>
<td><a href="http://www.yama.cn/">http://www.yama.cn/</a></td>
<td></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Hebei Youjin Trade Co., Ltd.</td>
<td>Rm. 1709, No. 98, Huanghe Road, High-Tech Zone, Shijiazhuang, Hebei, China (Mainland)</td>
<td><a href="http://www.co-sealings.com/">http://www.co-sealings.com/</a></td>
<td><a href="mailto:info@co-sealings.com">info@co-sealings.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Hengshui Aichang International Trading Co., Ltd.</td>
<td>1-1001, Fuxingyuan, No. 161, Ronghua Street, Hengshui, Hebei, China (Mainland)</td>
<td><a href="http://www.co-sealings.com/">http://www.co-sealings.com/</a></td>
<td><a href="mailto:info@co-sealings.com">info@co-sealings.com</a></td>
<td>Manufacturing</td>
</tr>
<tr>
<td>Company Name</td>
<td>Address</td>
<td>Website</td>
<td>Contact Email</td>
<td>Type</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>Hitex Insulation (Ningbo) Co., Ltd.</td>
<td>Room 204, Building 2, Shandong Business Center, Jiangdong Dist., Ningbo, Zhejiang</td>
<td><a href="http://www.hiutexinsulation.com">http://www.hitexinsulation.com</a></td>
<td><a href="mailto:hitex@hitexinsulation.com">hitex@hitexinsulation.com</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Huatek New Material Inc.</td>
<td>Yongyi Road, Xinzheng, Xinxiang, Shandong, China (Mainland)</td>
<td><a href="http://www.huatek.cn">http://www.huatek.cn</a></td>
<td><a href="mailto:huatek@163.com">huatek@163.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Jiangxi Jiludng New Material Co., Ltd.</td>
<td>NO. 1, Zhongshan East Road, Rugao, Nantong, Jiangsu, China (Mainland)</td>
<td><a href="http://www.cide.com">http://www.cide.com</a></td>
<td><a href="mailto:cide@jiludegroup.com">cide@jiludegroup.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Jiangxi Aider Seal &amp; Packing Co., Ltd.</td>
<td>Wanfu Economic Development zone, Wuming, Jiuhu City, Jiangxi, China</td>
<td><a href="http://www.aiderseal.com">http://www.aiderseal.com</a></td>
<td><a href="mailto:aiderseal@china-exf.com">aiderseal@china-exf.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Jiuhuaqiang Huaxing Glass Fiber Co., Ltd.</td>
<td>Deyi Glass Fiber Industrial Base, Lushan District, Jiuhu City, Jiangxi, China</td>
<td><a href="http://www.jiuhuaglass.cn">http://www.jiuhuaglass.cn</a></td>
<td><a href="mailto:jgglass@jiuhuaglass.cn">jgglass@jiuhuaglass.cn</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Jiangsu Xiangtian Industrial Co., Ltd.</td>
<td>No. 8 Jianshe Road, International Trade Industrial and Functional Zone, Meijiang Town, Lanzhou City, Zhejiang, China</td>
<td><a href="http://www.hxnt.com">http://www.hxnt.com</a></td>
<td><a href="mailto:export@zhejiang.com">export@zhejiang.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Lanxi Jiao Fiberglass Co., Ltd.</td>
<td>No. 7, Zhongshan East Road, Rugao, Nantong, Jiangsu, China (Mainland)</td>
<td><a href="http://www.lxff.com">http://www.lxff.com</a></td>
<td><a href="mailto:jiao@zhejiang.com">jiao@zhejiang.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Mowco Industry Limited</td>
<td>10D, Block B, Lushan Building, Chun Feng Road, Luo Hu District, Shenzhen, China</td>
<td><a href="http://www.mowco-fabrics.com">www.mowco-fabrics.com</a></td>
<td><a href="mailto:mowcoindustry@gmail.com">mowcoindustry@gmail.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Nanjing Dahchrift New Materials Co., Ltd.</td>
<td>Taowu Industrial Park, Hongjie Street, Jiangning District, Nanjing, Jiangsu, China (Mainland)</td>
<td><a href="http://www.ncy.com">http://www.ncy.com</a></td>
<td><a href="mailto:liyujun@ncynmc.com">liyujun@ncynmc.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Nanjing Tianyuan Fiberglass Material Co., Ltd.</td>
<td>8 Chunyang Rd., Baijiang Economic Development Zone, Jiangning Area, Nanjing, Jiangsu, China (Mainland)</td>
<td><a href="http://www.njtyf.com">http://www.njtyf.com</a></td>
<td><a href="mailto:njtyfiberglass@163.com">njtyfiberglass@163.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>New Fire Co., Ltd.</td>
<td>No. 190, Lane 456, Detaqiao Road, Pudong (Kangqiao), Shanghai, China 201315</td>
<td><a href="http://www.newfire.com.cn">http://www.newfire.com.cn</a></td>
<td><a href="mailto:sales@newfire.com">sales@newfire.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Ningbo EAS Material Co., Ltd.</td>
<td>2nd Floor, 3rd Building, Jinhua Road, Ningbo, Zhejiang, China (Mainland)</td>
<td><a href="http://www.eas-fiberlass.com">http://www.eas-fiberlass.com</a></td>
<td><a href="mailto:sales@eas-fiberlass.com">sales@eas-fiberlass.com</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Ningbo Firewheel Thermal Insulation &amp; Sealing Co., Ltd.</td>
<td>RM. 101, Yangjiao Int'l Plaza, No. 258, Wuyong Road, Shanghai, China (Mainland)</td>
<td><a href="http://www.firewheel.com.cn">http://www.firewheel.com.cn</a></td>
<td><a href="mailto:WINTER@FIREWHEEL.COM.CN">WINTER@FIREWHEEL.COM.CN</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Ningbo Fitow High Strength Composites Co., Ltd.</td>
<td>No. 13, West Zhegouxue Road, Ninghai District, Ningbo, Zhejiang, China (Mainland)</td>
<td><a href="http://www.fitow.com">http://www.fitow.com</a></td>
<td><a href="mailto:manager@unistarfiberglass.com">manager@unistarfiberglass.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Ningbo Unistar Star Industry &amp; Trade Limited</td>
<td>RM. 203, 1st Floor, 1st Building, No. 99, Yangshan Road, High-Tech Zone, Ningbo, Zhejiang, China (Mainland)</td>
<td><a href="http://www.unistarfiberglass.com">http://www.unistarfiberglass.com</a></td>
<td><a href="mailto:sales@unistarfiberglass.com">sales@unistarfiberglass.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Ningbo BST Thermal Protection Products Co., Ltd.</td>
<td>No. 7, Wuhuan South Road, Economic And Technological Development Zone, Ningguo, Xuanzhou, Anhui, China (Mainland)</td>
<td><a href="http://www.firesave.com.cn">http://www.firesave.com.cn</a></td>
<td><a href="mailto:sales@unistarfiberglass.com">sales@unistarfiberglass.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Qingdao Feilianda Industry &amp; Trade Co., Ltd.</td>
<td>RM. 2602, No. 37, Lunyang Road, Shibe Dist., Qingdao, Shandong, China (Mainland)</td>
<td><a href="http://www.feilinda.com.cn">http://www.feilinda.com.cn</a></td>
<td><a href="mailto:sales@fcrellinda.com.cn">sales@fcrellinda.com.cn</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Qingdao Jialong Industry Company Limited</td>
<td>RM. 204, 1st Building, No. 63, Haier Road, Lianhu Dist., Qingdao, Shandong, China (Mainland)</td>
<td><a href="http://www.fibershield.com.cn">http://www.fibershield.com.cn</a></td>
<td><a href="mailto:qdfibershield@gmail.com">qdfibershield@gmail.com</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Qingdao Meikang Fireproof Materials Co., Ltd.</td>
<td>No. 88, Zhuhai Road, Pengda Development Zone, Qingdao, Shandong, China (Mainland)</td>
<td><a href="http://www.meikangco.cn">http://www.meikangco.cn</a></td>
<td><a href="mailto:sales@meikangco.cn">sales@meikangco.cn</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Qingdao Shihua Industry Co., Ltd.</td>
<td>No. 17 Jinhua Branch Rd, Shibe, Qingdao, Shandong, China</td>
<td><a href="http://www.fibershield.com.cn">http://www.fibershield.com.cn</a></td>
<td><a href="mailto:sales@fibershield.com.cn">sales@fibershield.com.cn</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Ruan City Ouhua Composite Material Co., Ltd.</td>
<td>Industrial Park, Yinxinqiao Town, Rugao, Jiangsu, China (Mainland)</td>
<td><a href="http://www.fibershield.com.cn">http://www.fibershield.com.cn</a></td>
<td><a href="mailto:sales@fibershield.com.cn">sales@fibershield.com.cn</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Ruan City Ouhua Fiberglass Co., Ltd.</td>
<td>No. 15, 10th Group, Kanzhuang Village, Chengbei Street, Rugao, Jiangsu, China (Mainland)</td>
<td><a href="http://www.fibershield.com.cn">http://www.fibershield.com.cn</a></td>
<td><a href="mailto:sales@fibershield.com.cn">sales@fibershield.com.cn</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Shanghai Bosthe Insulative Material Co., Ltd.</td>
<td>No. 1658, Qingzhao Road, Qingpu, Shanghai, China (Mainland)</td>
<td><a href="http://www.bosehe-ind.com.cn">http://www.bosehe-ind.com.cn</a></td>
<td><a href="mailto:sales@bosehe-ind.com">sales@bosehe-ind.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Shanghai Horse Construction Co., Ltd.</td>
<td>Room 908, 3rd Building, Xianghe Fortune Plaza, Lane 3088, Gonghe Yin Rd., Shanghai, China (Mainland)</td>
<td><a href="http://www.shhorse.com.cn">http://www.shhorse.com.cn</a></td>
<td><a href="mailto:sales@shhorse.com.cn">sales@shhorse.com.cn</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Shanghai Industrial Products Imp. &amp; Exp. Co., Ltd.</td>
<td>3F Luxun Mansion, No. 568 Yuqing Road, Shanghai, China</td>
<td><a href="http://www.industrialproducts-sh.com.cn">http://www.industrialproducts-sh.com.cn</a></td>
<td><a href="mailto:info@industrialproducts-sh.com.cn">info@industrialproducts-sh.com.cn</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Shanghai Liankun Electronics Materials Co., Ltd.</td>
<td>No. 99, Puqing Road, Zhangye Industrial Zone, Songjiang District, Shanghai, China (Mainland)</td>
<td><a href="http://www.shllkj.cn.cn">http://www.shllkj.cn.cn</a></td>
<td><a href="mailto:ryw@shllkj.cn.cn">ryw@shllkj.cn.cn</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Company Name</td>
<td>Address</td>
<td>Website</td>
<td>Email</td>
<td>Type</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>Shanghai Suita Environmental Protection Technology Co., Ltd.</td>
<td>3/F, Bldg. 4, No. 85, Senda Rd., Pujiang Town, Minhang Dist., Shanghai, China (Mainland)</td>
<td><a href="http://www.suita.com.cn/">http://www.suita.com.cn/</a></td>
<td><a href="mailto:sales@suitsuita.com">sales@suitsuita.com</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Shangqiu Huaanyi Fiberglass Co., Ltd.</td>
<td>Room 1204, Building 1, Kunchen Business Affairs Center, Didang New City, Shaoxing, Zhejiang, China (Mainland)</td>
<td><a href="http://www.shyfiber.com/">http://www.shyfiber.com/</a></td>
<td><a href="mailto:sunny@shunwaytools.com">sunny@shunwaytools.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Shaoxing Sunway Tools &amp; Hardware Import &amp; Export Co., Ltd.</td>
<td>Room 205, Building 6, Guangzhou Huating, Huashan, Daling St., Longhua New District, Shenzhen, China (Mainland)</td>
<td><a href="http://www.sunsweft-mesh.cn/">http://www.sunsweft-mesh.cn/</a></td>
<td></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Shenzhen Core-Tex Composite Materials Co., Ltd.</td>
<td>Room 12-12, Zhaojiu international Building, Hengqin District, Wuhan, Hubei, China (Mainland)</td>
<td><a href="http://www.coretexas-com.cn">http://www.coretexas-com.cn</a></td>
<td></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Shenzhen Songxin Silicone Products Co., Ltd.</td>
<td>Room 102, (F), No. 72-1, Yifudu Rd., Qiuwei Village, Nanlian Community, Longgang District, Shenzhen, China (Mainland)</td>
<td><a href="http://www.songxin-industry.com/">http://www.songxin-industry.com/</a></td>
<td><a href="mailto:william@saxond.com">william@saxond.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Suretex Composite Industrial Co., Ltd.</td>
<td>No. 12-12, Zhaojiu international Building, Hengqin District, Wuhan, Hubei, China (Mainland)</td>
<td><a href="http://www.suretex-composite.com/index.html">http://www.suretex-composite.com/index.html</a></td>
<td><a href="mailto:info@suretex.com">info@suretex.com</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Suretex Composite Co., Ltd.</td>
<td>Room 102, (F), No. 72-1, Yifudu Rd., Qiuwei Village, Nanlian Community, Longgang District, Shenzhen, China (Mainland)</td>
<td><a href="http://www.suretex-composite.com/index.html">http://www.suretex-composite.com/index.html</a></td>
<td></td>
<td>Trading company</td>
</tr>
<tr>
<td>Taian Fibtex Trade Co., Ltd.</td>
<td>Rm. 1701, Tianhong International Building, No. 96, Great Wall Rd., Taian, Shandong, China (Mainland)</td>
<td><a href="http://www.cephyrmetrics.com.cn/">http://www.cephyrmetrics.com.cn/</a></td>
<td><a href="mailto:james@fibtex.com">james@fibtex.com</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Taian Jili Composite Materials Co., Ltd.</td>
<td>Room 1701, Tianhong International Building, No. 96, Great Wall Rd., Taian, Shandong, China (Mainland)</td>
<td><a href="http://www.tjfuli.com/">http://www.tjfuli.com/</a></td>
<td><a href="mailto:hebei@tjfuli.net.cn">hebei@tjfuli.net.cn</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Taixing Chuanda Plastic Co., Ltd.</td>
<td>Industrial Concentration Park, Jianghua Town, Taixing, Taizhou, Jiangsu (Mainland)</td>
<td><a href="http://chundaplas.preview.alibaba.com">http://chundaplas.preview.alibaba.com</a></td>
<td></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Taixing Kaixin Composite Materials Co., Ltd.</td>
<td>No. 8, Yiming Rd., Genli Township, Yiming, Jiangsu, China (Mainland)</td>
<td><a href="http://kaixinxplas.com">http://kaixinxplas.com</a></td>
<td></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Taixing Ruifeng Rubber Products Co., Ltd.</td>
<td>North Side Of Planning 1st Rd., Yongjiang Town, Gaogang Dist., Taizhou, Jiangsu, China (Mainland)</td>
<td><a href="http://www.rfzr.com/">http://www.rfzr.com/</a></td>
<td><a href="mailto:tuijeno@ixrfex.com">tuijeno@ixrfex.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Taixing Yichen Composite Material Co., Limited</td>
<td>West Side Of Daiwang Road, Chengdong High Technology Park, Taizhou, Jiangsu, China (Mainland)</td>
<td><a href="http://www.teflon-fabric.cn">http://www.teflon-fabric.cn</a></td>
<td></td>
<td>Trading company</td>
</tr>
<tr>
<td>TaiZhou Xinxing Fiberglass Products Co., Ltd.</td>
<td>XinXing Road No. 1, Louzhuang Town, Jiangyan, TaiZhou, Jiangsu, China</td>
<td><a href="http://www.crocfiber.com">http://www.crocfiber.com</a></td>
<td><a href="mailto:wanz42188@outlook.com">wanz42188@outlook.com</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Tenglong Sealing Products Manufacturer</td>
<td>No. 78, West Zhexing Road, Linhang Economic Development District, Yixiao, Zhejiang, China (Mainland)</td>
<td><a href="http://www.sealings.cn">http://www.sealings.cn</a></td>
<td><a href="mailto:sales@sealings.cn">sales@sealings.cn</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>TEXASPRO (CHINA) COMPANY</td>
<td>Rm. 802, 8/F, Carnival Comm Building, 18 Java Rd., North Point, Hong Kong</td>
<td><a href="http://www.fiberless.cn">http://www.fiberless.cn</a></td>
<td><a href="mailto:sales@fiberless.cn">sales@fiberless.cn</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Tianjin BinJin Fiberglass Products Co., Ltd.</td>
<td>Liulin Town Farm, Shuangtou Town, Beichen District, Tianjin, Tianjin (Mainland)</td>
<td><a href="http://www.zhibjinc.com">http://www.zhibjinc.com</a></td>
<td></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Taizhou Suretex Composite Co., Ltd.</td>
<td>No. 5020, Tangqiao International Energy Market, No. 1, South China (Mainland)</td>
<td><a href="http://www.suretex-stadium.com/">http://www.suretex-stadium.com/</a></td>
<td></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Walline Industries Co., Ltd.</td>
<td>Room 524, No. 2005, West Zhongshan Road, Shanghai, Shanghai</td>
<td><a href="http://www.wlline.cn/">http://www.wlline.cn/</a></td>
<td><a href="mailto:sales@walline.cn">sales@walline.cn</a></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Wuhan Biafro Industries Co., Ltd.</td>
<td>No. 117, Xuan Lake Ave., Wuhan, Hubei, China (Mainland)</td>
<td><a href="http://www.dhtrm.cn.com">http://www.dhtrm.cn.com</a></td>
<td></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Wuxi First Special-Type Fiberglass Co., Ltd.</td>
<td>No. 1, Yanzhuang Road, Yangjiao Development Area, Haishan Area, Wuxi, Jiangsu, China (Mainland)</td>
<td><a href="http://www.firstfiber.com">http://www.firstfiber.com</a></td>
<td></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Wuxi Xingnian Hi-tech Material Co., Ltd.</td>
<td>No. 20, Zixing Road, Xizhang Industry Park, Huishan District, Wuxi, Jiangsu, China</td>
<td><a href="http://wuxi-xingnian-en-made-in-china.com/company=Wuxi-Xingnian-Hi-Tech-Material-Co-Ltd.html">http://wuxi-xingnian-en-made-in-china.com/company=Wuxi-Xingnian-Hi-Tech-Material-Co-Ltd.html</a></td>
<td></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Yuyao Feida Insulation Sealing Factory</td>
<td>Tianhua Village, Lianping Street, Yuyao, Ningbo, Zhejiang, China</td>
<td><a href="http://www.sfbd.com.cn">http://www.sfbd.com.cn</a></td>
<td><a href="mailto:feida@sfbd.com.cn">feida@sfbd.com.cn</a></td>
<td>Manufacturer</td>
</tr>
<tr>
<td>Yuyao Tianyi Special Carbon Fiber Co., Ltd.</td>
<td>No. 219 Zhoutai Road, Yabei New Industrial Zone, Ningbo, Zhejiang, China</td>
<td><a href="http://china-firebasket.en-made-in-china.com/">http://china-firebasket.en-made-in-china.com/</a></td>
<td></td>
<td>Manufacturer, Trading Company</td>
</tr>
<tr>
<td>Zibo Irvine Trading Co., Ltd.</td>
<td>Rm. 103, 12/F, Yujing Mansion, No. 27, North West 5th Rd., Zhaogang Dist., Zibo, Shandong, China (Mainland)</td>
<td><a href="http://www.zbirvine.com">http://www.zbirvine.com</a></td>
<td><a href="mailto:sales@zbirvine.com">sales@zbirvine.com</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Zibo Yan Xing Fire-Resistant And Heat-Preservation Material Co., Ltd.</td>
<td>West End Of Dianchang Road, Zhaocun Dist., Zibo, Shandong, China (Mainland)</td>
<td><a href="http://www.yxAEFGiber.com">http://www.yxAEFGiber.com</a></td>
<td><a href="mailto:yaxingfiber@163.com">yaxingfiber@163.com</a></td>
<td>Trading Company</td>
</tr>
<tr>
<td>Zibo Yuntai Furnace Technology Co., Ltd.</td>
<td>West Of Poe Village, Gucun Town, Zichuan District, Zibo, Shandong, China (Mainland)</td>
<td><a href="http://www.zbyuntai.com">http://www.zbyuntai.com</a></td>
<td></td>
<td>Manufacturer, Trading Company</td>
</tr>
</tbody>
</table>
EXHIBIT I-15
List of Importers of ASF from China

1. ACIT (USA) Inc.
   Address: 6333 HAZELWOOD LANE SE
             BELLEVUE, WA 98006, USA
             TEL 425-865-8011
             FAX 425-865-8015
             E-Mail – infor@acit-usa.com
             www.acit-usa.com

2. Integrated Marketing Group
   Address: 1740 W. Katella Ave. Suite A
             Orange, CA 92867
             PHONE: (714) 771-2401
             FAX: (714) 771-3925
             www.integratedmarketing-group.com

3. Lewco Specialty Products, Inc.
   Address: 6859 Renoir Avenue
             Baton Rouge, La. 70806
             Ph: (225) 924-3221
             Fax: (225) 927-2918
             www.lewcospecialtyproducts.com

4. Mid-Mountain Materials Incorporated
   Address: 2731 –77th Ave SE, Ste 100
             PO Box 800
             Mercer Island, WA 98040
             (206) 762-7600
             (800) 382-2208 Toll Free
             (206) 762-7694 Fax
             E-Mail - info@mid-mountain.com
             www.mid-mountain.com

5. Pds Bar Tech
   Address: 2519 East Southmore
             Pasadena, TX 77502
             Tel. (800) 950-8489; (713) 472-8122
             Fax (713) 472-6804
             www.pdsbartech.com
6. ASF, INC.
Address: 3812 Spring Hill Avenue
Mobile, AL 36608
Tel: (251) 445-0551
Fax: (251) 460-4432
http://asfloistics.com

7. Acmetex
Address: 5291 Forest Hill Drive
Mississauga, Ontario, Canada L5M 5B7
Tel: (905) 487-3428
Fax: (888) 641-8018
E-Mail: sales@acmetex.com
www.acmetex.com

8. Newtex
Address: 8050 Victor Mendon Road
Victor, NY 14564
Toll-free: (800) 836-1001
Tel: (585) 924-9135
Fax: (585) 924-4645
www.newtex.com

9. Amatex Corporation
Address: PO Box 228, Norristown, PA 19404-0228
1032 Stanbridge Street
Norristown, PA 19401
800-441-9680 / 610-277-6100
www.amatex.com

10. Alpha Associates
Address: 145 Lehigh Ave.
Lakewood, NJ 08701
800-631-5399
732-634-5700
www.alphainc.com/
11. Steiner Industries
   Address: 5801 N. Tripp Ave.
   Chicago, IL 60646-6013
   Toll Free: 800.621.4515
   Tel: 773.588.3444
   Fax: 773.588.3450
   E-Mail: info@steinerindustries.com
   www.steinerindustries.com

12. Atlanta Fiberglass, USA
   Address: 1080 Powers Pl.¹
   Alpharetta, GA 30005
   Tel: 770-667-5066
   www.afg-usa.com

13. Kimberly Clark Professional
   Address: 1400 Holcomb Bridge Road
   Roswell, GA 30076
   Tel: 1-800-241-3146
   www.kcprofessional.com

14. John Tillman Company
   Address: 1300 W. Artesia Blvd.
   Compton, CA 90220
   Tel (310) 764-0110, (800) 255-5480
   Fax (310) 764-0104, (310) 764-2700
   www.jtillman.com

15. Sellstrom Manufacturing Company
   Address: 2050 Hammond Drive,
   Schaumburg, IL 60173
   Tel: 800-323-7402
   www.sellstrom.com

¹ Note the company website also identifies 205 West Smoketree Terrace, zip code 30009 as the company’s corporate headquarters street address.
16. Stanco Manufacturing, Inc.

Address: 2004 W Main Street
Atlanta, TX 75551-3052
Tel: 903-796-7936
Fax: 903-796-9237
1-800-348-1148 (toll free)
E-Mail: customerservice@stancomfg.com
www.stancomfg.com

17. Gentex Corporation

Address: 324 N. Main Street
Carbondale, PA 18407
Tel: (570) 282-3550
www.gentexcorp.com

18. Frenzelit North America, Inc.

Hdqtrs: 18050 Tranquility Road
Purcellville, VA 20132
Tel: 540-338-2056
Fax: 540-338-2079
E-Mail: frenzelit@frenzelit.net
www.frenzelit.net