



**Pre-Sampling Questionnaire (Importer)
Anti-dumping and Subsidy investigation
Optical Fibre Cables imported from the People's
Republic of China
Case AD0021 & AS0022**

Period of Investigation:	1 January 2021 to 31 December 2021
Injury Period:	1 January 2018 to 31 December 2021
Deadline for response:	13 May 2022
Case Team Contact:	ad0021@traderemedies.gov.uk & as0022@traderemedies.gov.uk
Completed on behalf of:	BT Telecommunications plc

Important Note: If you are interested in participating in both the anti-dumping (AD0021) and the anti-subsidy (AS0022) investigations, please submit this completed questionnaire via the TRS to both investigations, so you are registered on both cases.

When you have completed this form, indicate the **confidentiality** of this document by placing an X in the relevant box below. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete:

- Confidential
 Non-confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version** (guidance on confidentiality is available at: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#confidential-information-and-non-confidential-summaries>). Both copies should be returned to the



Trade Remedies
Authority

OFFICIAL

Confidential

Trade Remedies Authority

Non-Confidential

TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 13
May 2022.



Table of Contents

The scope of this investigation	3
Goods concerned.....	3
Like goods.....	3
Instructions.....	5
I – Who should complete this form	5
II - Why you are being asked to complete this pre-sampling questionnaire	5
III – Deadline for response	5
IV – Note about confidentiality	5
Section A – Activities of your company and any associated parties.....	7
A1 – Your company’s activities	7
A2 – Associated parties and operational links.....	8
Section B – Details of companies you import from.....	9
Section C – Sales, imports and domestic purchases	10
C1 – Total company revenue	10
C2 – Your imports of the goods concerned.....	10
C3 – Like goods purchased from a UK producer	11
Section D – Additional information	12
D1 – Other interested parties	12
D2 – Particular Market Situation.....	12
D3 – Scope	13
D4 – Product Control Numbers	13
D5 – Economic Interest Test.....	14
D6 – Anything else	15



The scope of this investigation

Goods concerned

This investigation covers optical fibre cables originating from the People's Republic of China, 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 code is only given for information and not all goods within this code are part of this investigation.

In this pre-sampling questionnaire, these goods will be referred to as the 'the goods concerned'. Any reference to 'goods concerned' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

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.

Like goods

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are like the goods concerned. Any reference to 'like goods' in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China which are like the goods concerned in all respects, or with characteristics closely resembling them.



Trade Remedies
Authority

OFFICIAL

Confidential

Trade Remedies Authority

Non-Confidential

Please follow the instructions for each question to provide the appropriate information regarding the goods concerned or like goods.

For more information about this case, you may refer to the Notice of Initiation published at: www.trade-remedies.service.gov.uk/public/case/AD0021 and www.trade-remedies.service.gov.uk/public/case/AS0022.



Instructions

I – Who should complete this form

You should complete this form if you are a UK importer of the goods concerned.

II - Why you are being asked to complete this pre-sampling questionnaire

We are seeking your cooperation as an importer of the goods concerned to identify whether this alleged dumping has occurred, the alleged exports were subsidised, and if this has caused injury to the UK industry. The information your company provides will help us determine a fair and appropriate response.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of UK importers complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

For more information about this case, you may refer to the Notice of Initiation published at: www.trade-remedies.service.gov.uk/public/case/AD0021 and www.trade-remedies.service.gov.uk/public/case/AS0022.

III – Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than 13 May 2022. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact the case team at ad0021@traderemedies.gov.uk or as0022@traderemedies.gov.uk for further information.

IV – Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date. Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header. It is your responsibility to ensure that the non-confidential version does not contain any confidential information.

Please see <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information> for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.



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/AD0021 and www.trade-remedies.service.gov.uk/public/case/AS0022.



Section A – Activities of your company and any associated parties

A1 – Your company’s activities

To determine your company’s role for the purpose of this investigation, please select the activity/activities of your company below. For a definition of goods concerned please refer to the section above on ‘the scope of this investigation.’

- importer of the goods concerned in the UK
- other (please give details below)

If you have selected ‘other’, please describe the role of your company with regards to the goods concerned or like goods:

BT Telecommunications plc purchases cables on [redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier’s / Competitors commercial knowledge/advantage they would not otherwise have]. The goods are shipped via our logistics partner British Cable Company in Manchester or via BT Supply Chain Distribution network from where the goods are distributed to warehouses and locations within the BT telecommunications group.

Openreach have made a commitment to deliver ‘gigabit capable broadband’ to 85 per cent of the UK by 2025, aiming to build Full Fibre technology to a total of 25 million premises, including more than six million in the hardest-to-serve parts of the country. The supply of fibre cable is a global market. In order to meet the build, having sufficient capacity is critical.

Please describe your interest in this case:

Please answer here

As a major user of optical fibre cable in the UK, we’d like to share our views on supply from China and are interested in any outcomes of the investigation. Sufficient capacity at competitive pricing is critical to deliver the Openreach build ambitions.



A2 – Associated parties and operational links

Please give details of all associated parties involved in the production and/or sales (export and/or domestic) of the goods concerned or like goods during the POI. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of ‘Related Persons’ in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the goods concerned or like goods.

	Company name	Company location (city, country)	Activities	Relationship
Your company	<i>BT Telecommunications Ltd</i>	London, UK	Contracting and warehousing	
Associated Party 1	<i>Openreach Ltd</i>	London, UK	Further processing of the goods concerned	Wholly owned subsidiary
Associated Party 2	<i>The Faraday Procurement Company Ltd (BT Sourced)</i>	Dublin, Ireland	Purchasing team	Wholly owned subsidiary
Associated Party 3	<i>British Cables Company</i>	Manchester, UK	Processing and warehousing	Important supplier in supply chain

+ Add additional rows as required



Section B – Details of companies you import from

Please provide the contact details for each individual company you import from.

Exporter/Supplier name	Address	Contact Details
[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have]	[redacted as per Column 1]	[redacted – Personal Information for purposes of Freedom of Information Act 2000] Sales representative Tel: [redacted as above] Mobile: [redacted as above] Email: [redacted as above]
[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have]	[redacted as per Column 1]	[redacted – Personal Information for purposes of Freedom of Information Act 2000] Account Manager Mobile: [redacted as above] [redacted as above]
[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have]	[redacted as per Column 1]	[redacted as above] [redacted as above] [redacted as above]

+ Add additional rows as required



Section C – Sales, imports and domestic purchases

C1 – Total company revenue

Please provide your company’s total revenue and the revenue of the goods concerned:

	Value in GBP (£)
Total revenue of your company in the POI	£21,331m (Financial Year 1 st of April 2021 – 31 st of March 2022) BT Group plc Annual Report 2021
Total revenue of your company for the goods concerned in the POI	Not applicable since BT doesn’t onward sell the goods concerned

C2 – Your imports of the goods concerned

Please provide the total volume and value of the goods concerned imported by your company from the People’s Republic of China in the POI:

	Volume (fkm)	Value in GBP (£)



The goods concerned imported into the UK in the POI	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier’s / Competitors commercial knowledge/advantage they would not otherwise have]	[redacted – as per previous column]
The goods concerned imported into the UK in the POI and resold in the UK	N/A	N/A
The goods concerned imported into the UK in the POI and consumed by your own company	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier’s / Competitors commercial knowledge/advantage they would not otherwise have]	[redacted – as per previous column]
The goods concerned imported into the UK in the POI and exported	N/A	N/A

Please provide the total volume and value of the like goods imported by your company from all other countries in the POI:

	Volume (fkm)	Value in GBP (£)
--	--------------	------------------



The like goods imported into the UK in the POI	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have] (excl.UK)	[redacted – as per previous column] (excl. UK)
The like goods imported into the UK in the POI and resold in the UK	<u>N/A</u>	<u>N/A</u>
The like goods imported into the UK in the POI and consumed by your own company	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have] (excl.UK)	[redacted – as per previous column] (excl. UK)
The like goods imported into the UK in the POI and exported	<u>N/A</u>	<u>N/A</u>

C3 – Like goods purchased from a UK producer

If you have also purchased like goods from a UK producer during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.



	Volume (fkm)	Value in GBP (£)
Like goods purchased from UK producers in the POI	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier’s / Competitors commercial knowledge/advantage they would not otherwise have]	[redacted – as per previous column]
Like goods purchased from UK producers in the POI and resold in the UK market	<u>N/A</u>	<u>N/A</u>
Like goods purchased from UK producers in the POI and consumed by your own company	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier’s / Competitors commercial knowledge/advantage they would not otherwise have]	[redacted – as per previous column]
Like goods purchased from UK producers in the POI and exported	<u>N/A</u>	<u>N/A</u>



Section D – Additional information

D1 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name, website, and contact name and email address details below.

Organisation name	Website	Contact name and email address (if known)

D2 – Particular Market Situation

If you have any concerns or information about the possible existence of a particular market situation in the People’s Republic of China, please provide details in the box below. This can include examples such as:

- Prices are artificially low
- There is significant barter trade (e.g. goods exchanged for other goods)
- Prices reflect non-commercial factors; or
- Anything else

We are aware that suppliers across the world are facing cost increases due to the global economic situation.

During the last tender in 2020/2021, BT has awarded business to companies from China and across the world on the basis of technical specification of the cables, submitted pricing and supply chain delivery models.



D3 – Scope

Do you agree with the scope of the investigation as outlined on page 3?

Yes

No

If you have answered no to the above question, please can you explain why?

No comment

D4 – 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.



We have created the following draft PCN table:

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.

Please review the draft PCN structure for this investigation in the table above. Please include any comments on the PCN structure in the box provided.

No comment

D5 – Economic Interest Test

It is a requirement of the investigation to conduct an Economic Interest Test (EIT). The aim of the EIT process is to determine whether the implementation of the proposed trade remedies measure is in the wider economic interest of the UK. In



order to obtain a complete picture of the UK market, could you please help by identifying UK business which may wish to contribute to our investigation. If possible, please provide the names and contact information for any UK-based companies operating in the optical fibre cables market. Please confirm in the final column if we are able to contact these companies.

	Company name	Company location (City, country)	Company Contact Information (email/telephone)	Relationship	Can we contact Y/N
1	Prysmian Cables & Systems Limited	Chickenhall Lane, S050 6YU Eastleigh (Hampshire), United Kingdom	[redacted – Personal Information for purposes of Freedom of Information Act 2000] M [redacted – as above]	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have]	Y
2	Emtelle UK Ltd	Hawick, Haughhead, Roxburghshire, TD9 8LF	[redacted – Personal Information for purposes of Freedom of Information Act 2000] M [redacted – as above]	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have]	Y
3	Commscope	W1-09 Columba House Adastral Park, Martlesham, Suffolk	[redacted – Personal Information for purposes of Freedom of Information Act 2000] M [redacted – as above]	[redacted – Commercially Sensitive Information for the purposes of the Freedom of Information Act (2000)) which would give Supplier's / Competitors commercial knowledge/advantage they would not otherwise have]	Y



4	British Cables Company Ltd	Delaunays Road, Blackley, Manchester, M9 8FP	[redacted – Personal Information for purposes of Freedom of Information Act 2000] M [redacted – as above]	Supplier	Y
---	----------------------------	--	--	----------	---

D6 – Anything else

Please use the box below to provide information about anything else you consider relevant to this investigation.

Click or tap here to enter text.

Now you have reached the end of this questionnaire please ensure that you have prepared a confidential and non-confidential version and indicated the status of each within the header. Please return both versions to the TRA using the Trade Remedies Service (trade-remedies.service.gov.uk).