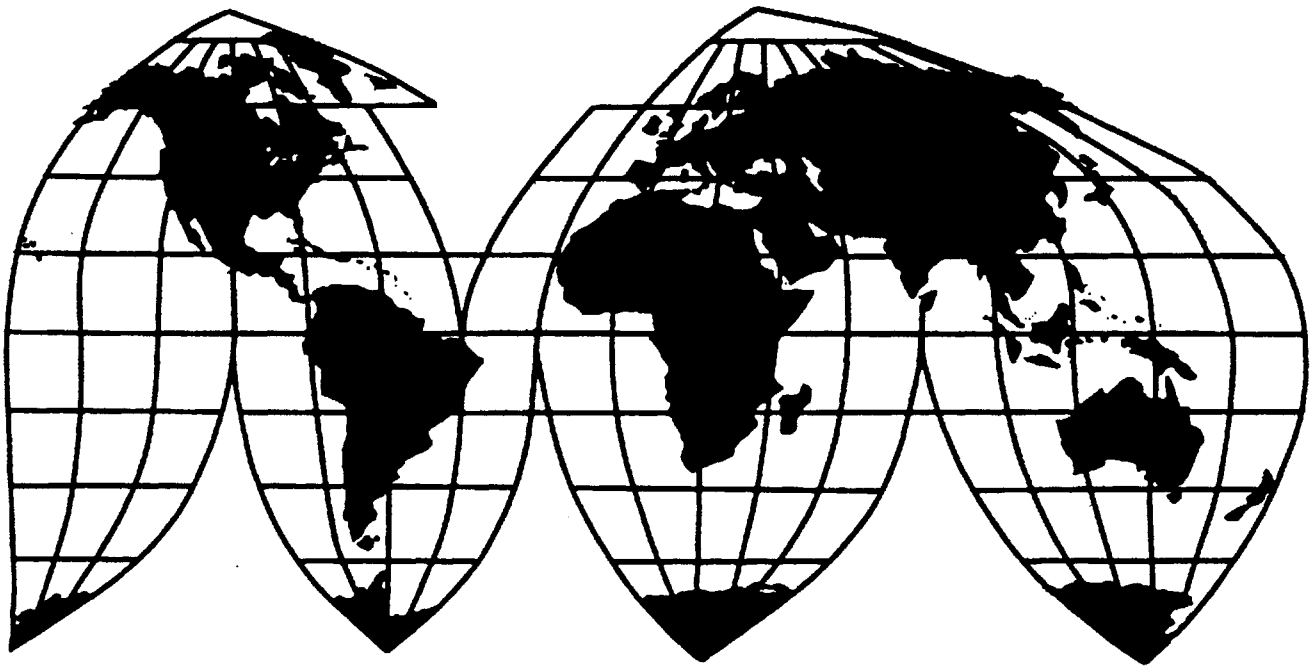
Ironing Tables and Certain Parts Thereof From China

Investigation No. 731-TA-1047 (Preliminary)

Publication 3623 **August 2003**

U.S. International Trade Commission



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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1047 (Preliminary)

IRONING TABLES AND CERTAIN PARTS THEREOF FROM CHINA

DETERMINATION

On the basis of the record[1] developed in the subject investigation, the United States International Trade Commission (Commission) determines, pursuant to section 733(a) of the Tariff Act of 1930 (19 U.S.C. § 1673b(a)) (the Act), that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports from China of ironing tables and certain parts thereof, provided for in subheading 9403.20.00 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (LTFV).

COMMENCEMENT OF FINAL PHASE INVESTIGATION

Pursuant to section 207.18 of the Commission's rules, the Commission also gives notice of the commencement of the final phase of its investigation. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in section 207.21 of the Commission's rules, upon notice from the Department of Commerce (Commerce) of an affirmative preliminary determination in the investigation under section 733(b) of the Act, or, if the preliminary determination is negative, upon notice of an affirmative final determination in that investigation under section 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigation need not enter a separate appearance for the final phase of the investigation. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigation.

BACKGROUND

On June 30, 2003, a petition was filed with the Commission and Commerce by Home Products International, Inc. (HPI), Chicago, IL, alleging that an industry in the United States is materially injured or threatened with material injury by reason of LTFV imports of ironing tables and certain parts thereof from China. Accordingly, effective June 30, 2003, the Commission instituted antidumping duty investigation No. 731-TA-1047 (Preliminary).

Notice of the institution of the Commission's investigation and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of July 8, 2003 (68 FR 40683). The conference was held in Washington, DC, on July 21, 2003, and all persons who requested the opportunity were permitted to appear in person or by counsel.

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[1] The record is defined in sec. 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR § 207.2(f)).

VIEWS OF THE COMMISSION

Based on the record in this investigation, we find that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of ironing tables from China that allegedly are sold in the United States at less than fair value ("LTFV").

I. THE LEGAL STANDARD FOR PRELIMINARY DETERMINATIONS

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determination, whether there is a reasonable indication that a domestic industry is materially injured, threatened with material injury, or whether the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.[1] In applying this standard, the Commission weighs the evidence before it and determines whether "(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation."[2]

II. DOMESTIC LIKE PRODUCT

A. In General

To determine whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the "domestic like product" and the "industry."[3] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Act"), defines the relevant domestic industry as the "producers as a [w]hole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[4] In turn, the Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation ...."[5]

The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and uses" on a case-by-case basis.[6] No single factor is dispositive, and the Commission

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[1] 19 U.S.C. §§ 1671b(a), 1673b(a); see also American Lamb Co. v. United States, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); Aristech Chemical Corp. v. United States, 20 CIT 353, 354-55 (1996). We note that no party argued that the establishment of an industry is materially retarded by reason of the allegedly unfairly traded imports.

[2] American Lamb, 785 F.2d at 1001 (Fed. Cir. 1986); see also Texas Crushed Stone Co. v. United States, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

[3] 19 U.S.C. § 1677(4)(A).

[4] Id.

[5] 19 U.S.C. § 1677(10).

[6] See, e.g., NEC Corp. v. Department of Commerce, 36 F. Supp.2d 380, 383 (Ct. Int'l Trade 1998); Nippon Steel Corp. v. United States, 19 CIT 450, 455 (1995); Torrington Co. v. United States, 747 F. Supp. 744, 749 n.3 (Ct. Int'l Trade 1990), aff'd, 938 F.2d 1278 (Fed. Cir. 1991) ("every like product determination 'must be made on the particular record at issue' and the 'unique facts of each case' "). The Commission generally considers a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See Nippon, 19 CIT at 455, n.4; Timken Co. v. United States, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

may consider other factors it deems relevant based on the facts of a particular investigation.[7] The Commission looks for clear dividing lines among possible like products, and disregards minor variations.[8] Although the Commission must accept the determination of the Department of Commerce ("Commerce") as to the scope of the imported merchandise allegedly subsidized or sold at less than fair value, the Commission determines what domestic product is like the imported articles Commerce has identified.[9]

B. Product Description

Commerce has defined the imported merchandise within the scope of this investigation as: floor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with various features, including iron rests, linen racks, and others. The subject ironing tables may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this investigation.

Furthermore, this investigation specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. For purposes of this investigation, the term "unassembled" ironing table means product requiring the attachment of the leg assembly to the top or the attachment of an included feature such as an iron rest or linen rack. The term "complete" ironing table means product sold as a ready-to-use ensemble consisting of the metal-top table and a pad and cover, with or without additional features, e.g. iron rest or linen rack. The term "incomplete" ironing table means product shipped or sold as a "bare board" i.e., a metal-top table only, without the pad and cover- with [sic] or without additional features, e.g. iron rest or linen rack. The major parts or components of ironing tables that are intended to be covered by this investigation under the term "certain parts thereof" consist of the metal top component (with or without assembled supports and slides) and/or the leg components, whether or not attached together as a leg assembly. The investigation covers separately shipped metal top components and leg components, without regard to whether the respective quantities would yield an exact quantity of assembled ironing tables.

Ironing tables without legs (such as models that mount on walls or over doors) are not floor-standing and are specifically excluded. Additionally, tabletop or countertop models with short

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[7] See, e.g., S. Rep. No. 96-249, at 90-91 (1979).

[8] Nippon Steel, 19 CIT at 455; Torrington, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249, at 90-91 (1979) (Congress has indicated that the domestic like product standard should not be interpreted in "such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not 'like' each other, nor should the definition of 'like product' be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.").

[9] Hosiden Corp. v. Advanced Display Mfrs., 85 F.3d 1561, 1568 (Fed. Cir. 1996) (Commission may find single domestic like product corresponding to several different classes or kinds defined by Commerce); Torrington, 747 F. Supp. at 748-52 (affirming Commission's determination of six domestic like products in investigations where Commerce found five classes or kinds).

legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded.[10]

Floor-standing, metal-top ironing tables (or ironing boards) are used in households, hotel rooms, and workplaces for the purpose of pressing apparel and other textile items. There are several varieties of ironing boards: (1) entry-level T-leg ironing boards generally sold in the $10-$15 price range; (2) standard ironing boards with four legs generally sold in the $20-$25 price range; (3) mid-price ironing tables, which are often longer, wider, or built with heavier construction and have additional features such as a clothes rack, and generally sold in the $30-$50 price range; and (4) upper-end ironing tables with multiple features generally sold in the $75-$120 price range.[11]

Floor-standing, metal-top ironing tables are made primarily of cold-rolled flat steel and wire, as well as fasteners, foam, corrugated carton, shrink film, and cotton fabric. The principal components of such ironing tables are: (1) the metal ironing surface, (2) a set of metal tracks, (3) legs, (4) a folding mechanism, (5) an ironing board pad, and (6) a cover. The metal legs of an ironing table are generally in either a T-leg or a four-leg design.[12] In each system, users press a lever that allows the legs to drop down and subsequently raise the height of the table or fold flat for storage.[13]

C. Domestic Like Product

We define the domestic like product as coextensive with the scope of this investigation. Petitioner Home Products International, Inc. (HPI), the sole remaining domestic producer of floor-standing, metal-top ironing tables, advocates a like product definition that is coextensive with the scope of the investigation, i.e. floor-standing, metal-top ironing tables, and specifically includes "incomplete" ironing tables.[14] Petitioner also explains why the like product should not be expanded to include over-the-door, wall-mounted and/or counter-top/table-top boards.[15] Respondents do not dispute petitioner's like product definition in the preliminary phase of this investigation.[16] Based on the record in the

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[10] 68 Fed. Reg. 44040-41 (July 25, 2003). The subject ironing tables were previously classified under Harmonized Tariff Schedule of the United States (HTSUS) subheading 9403.20.0010. Effective July 1, 2003, the subject ironing tables are classified under new HTSUS subheading 9403.20.0011. The subject metal top and leg components are classified under HTSUS subheading 9403.90.8040. Although the HTSUS subheadings are provided for convenience and for the purposes of U.S. Bureau of Customs and Border Protection (Customs), the Department's written description of the scope remains dispositive. Id. at 44041.

[11] Confidential Report as revised by memorandum INV-AA-121, Aug. 12, 2003 (CR) at I-3, Public Report (PR) at I-2 - I-3.

[12] CR at I-3, PR at I-3. A T-leg is made of a single metal tube inserted into a metal leg base that is shaped as an inverted "T." A four-leg ironing table has two legs, each made of two metal tubes that run parallel to each other, flare out to form a four-footed base on the floor, and typically have a cross-brace at or near the flare or at the end of the tubes. CR at I-3 - I-4, PR at I-3.

[13] CR at I-4, PR at I-3.

[14] Petition at 10-11; Petitioner's Postconference Brief at 4; Conference Transcript (Tr.) at 39 (Mr. Ikenson).

[15] Petitioner's Postconference Brief at 4-8.

[16] Respondent Importers' Postconference Brief at 14. Respondents have indicated that in any final phase investigation the Commission should expand the domestic like product to include the over-the-door and wall-mounted ironing boards that are made by the domestic producer. Id.; see also Respondent Target's Postconference Brief at 12 (reserving Target's right to comment more fully on the domestic like product issue during any final phase). Petitioner has addressed the excluded tables with respect to the Commission's traditional like product factors, but respondent importers and the respondent foreign producer have not (notwithstanding their statement that the Commission should consider expanding the definition in any final phase of the investigation).

preliminary phase of this investigation, we determine not to expand the domestic like product beyond the scope.

The record in the preliminary phase of this investigation indicates that the physical characteristics and uses of the floor-standing models are different from those of the counter-top/table-top and wall-mounted models. The former are larger and are often available with various features, such as iron rests and linen racks, that are not typically available with the latter. The counter-top/table-top and wall-mounted boards require separate, external support and are less versatile and portable than floor-standing models.[17] The over-the-door and floor-standing models are made in a common facility using the same production processes and employees, although the wall-mounted boards are not.[18] While the floor-standing and excluded boards are used in the same manner for the same tasks, interchangeability is somewhat limited in view of space constraints for the excluded boards.[19] While petitioner maintains that floor-standing boards for the hospitality/hotel market are sold to distributors and the excluded boards generally are not,[20] other evidence indicates that ironing tables generally are sold through similar channels of distribution. Both the floor-standing and counter-top/table-top boards are sold in mass market channels.[21] Producers and consumers, however, view the different types of boards as fulfilling different needs of differently situated consumers.[22] Lastly, floor-standing models sell for between $9 and $49, except for very high-end ironing tables, and the counter-top and table-top models typically sell for between $5 and $10. Wall-mounted boards are significantly more expensive than opening price point ironing tables.[23]

Based on the record in the preliminary phase of this investigation, we find one domestic like product consisting of floor-standing, metal-top ironing tables, coextensive with the scope.[24]

III. DOMESTIC INDUSTRY AND RELATED PARTIES

A. Domestic Industry

The domestic industry is defined as "producers as a [w]hole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[25] In defining the domestic industry, the Commission's general practice has been to include in the industry all domestic producers of the domestic like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.[26]

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[17] CR/PR at D-3 - D-5.

[18] CR/PR at D-6; Petitioner's Postconference Brief at 7-8.

[19] CR/PR at D-4 - D-5.

[20] Petitioner's Postconference Brief at 7, 9.

[21] CR/PR at D-5; Petitioner's Postconference Brief at 7, 9.

[22] CR/PR at D-5 - D-6.

[23] CR/PR at D-6 - D-7.

[24] We may reconsider this issue in the final phase of this investigation should the parties argue that we should expand the definition of the domestic like product, but note that the parties must specify what, if any, additional data the Commission should collect before we issue questionnaires in the final phase of the investigation. See 19 C.F.R. § 207.20(b); 61 Fed. Reg. 37818, 37826 (July 22, 1996).

[25] 19 U.S.C. § 1677(4)(A).

[26] See United States Steel Group v. United States, 873 F. Supp. 673, 681-84 (Ct. Int'l Trade 1994), aff'd, 96 F. 3d 1352 (Fed. Cir. 1996).

Based on our domestic like product finding, we conclude that the domestic industry consists of the two producers of ironing tables in the United States during the period examined: HPI and Whitney Design, Inc.[27]

B. Related Parties

We must further determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Act. That provision of the statute allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[28] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each case.[29] Both HPI and Whitney Design are related parties in that they imported subject merchandise throughout the period examined.

HPI imported *** subject ironing tables from China in 2000, *** in 2001, and *** in 2002; in January-March (interim) 2002, it imported *** and in interim 2003, it imported ***.[30] In 2002, the last full year of the period examined, HPI's subject imports accounted for *** percent of total subject imports for that year.[31]

HPI is the sole remaining domestic producer of ironing tables. Its subject imports in 2002 were equivalent to *** percent of its production.[32] The imports were reportedly due to HPI's decision to work with its manufacturing partners in Asia with respect to the higher-end, low-volume models and concentrate its domestic production on the lower-priced, high-volume models.[33] The record indicates that HPI's decision to import subject merchandise is aimed at rounding out its product line. Given these facts, we conclude that HPI's primary interest lies in domestic production, and find that appropriate circumstances do not exist to exclude HPI from the domestic industry.

Whitney Design imported *** subject ironing tables from China in 2000, *** in 2001, and *** in interim 2002.[34] Whitney Design ceased domestic production in April 2002 and became exclusively an

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[27] Whitney Design ceased production of ironing tables in April 2002 and sold its production equipment. CR/PR at II-2, IV-1 n.2.

[28] 19 U.S.C. § 1677(4)(B).

[29] Sandvik AB v. United States, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), aff'd without opinion, 904 F.2d 46 (Fed. Cir. 1990); Empire Plow Co. v. United States, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987). The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude the related parties include: (1) the percentage of domestic production attributable to the importing producer; (2) the reason the U.S. producer has decided to import the product subject to investigation, i.e., whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market; and (3) the position of the related producers vis-a-vis the rest of the industry, i.e., whether inclusion or exclusion of the related party will skew the data for the rest of the industry. See, e.g., Torrington Co. v. United States, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), aff'd without opinion, 991 F.2d 809 (Fed. Cir. 1993). The Commission has also considered the ratio of import shipments to U.S. production for related producers and whether the primary interests of the related producers lie in domestic production or in importation. See, e.g., Melamine Institutional Dinnerware from China, Indonesia, and Taiwan, Inv. Nos. 731-TA-741-743 (Final), USITC Pub. 3016 (Feb. 1997) at 14, n.81.

[30] CR/PR at Table IV-1.

[31] Compare CR/PR at Table IV-1 with CR/PR at Table IV-2.

[32] CR/PR at Table IV-1.

[33] Tr. at 22 (Mr. Graves).

[34] CR/PR at Table IV-1.

importer. Its subject imports in 2001 were equivalent to *** percent of its production.[35] In the first quarter of 2002, just before it ceased domestic production, its subject imports were equivalent to *** percent of its production.[36] Like HPI, its imports before its exit from domestic production were due to a decision to round out its line of standard ironing tables with imports of high-end tables.[37]

Although Whitney Design no longer produces the domestic like product in the United States, it does not appear likely that Whitney Design's financial performance reflects a benefit from its imports of subject merchandise. Rather, ***.[38] Accordingly, we find that appropriate circumstances do not exist to exclude Whitney Design from the domestic industry,[39] but will further examine this issue in the final phase of this investigation.

IV. CONDITIONS OF COMPETITION[40]

Several conditions of competition are pertinent to our analysis in the preliminary phase of this investigation.

Demand for ironing tables is relatively constant, albeit with some increase in late summer resulting from back-to-school sales.[41] Buyers are concentrated at the wholesale level and are dominated by a few large mass merchandisers that sell directly to consumers.[42] The market is characterized as mature, with moderate growth in demand of one to four percent annually, as the number of U.S. households expands.[43] During the period examined, apparent U.S. consumption fluctuated on an annual basis, rising by *** percent in 2001, but falling by *** percent in 2002, and was *** percent lower in interim 2003 than in interim 2002.[44]

Domestic production supplies the majority of the U.S. market for ironing tables, although that share has fallen steadily from *** percent in 2000 to *** percent in 2002 and to *** percent in interim 2003.[45] An increasing share of the U.S. market has been supplied by imports that have originated predominantly from China since 2000.[46] Throughout the period examined, the domestic industry had ***

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[35] CR/PR at Table IV-1.

[36] CR/PR at Table IV-1. Because Whitney Design was not engaged in the production of ironing tables for most of 2002, we have focused our related party analysis on the period before its departure from the market.

[37] Respondent Importers' Postconference Brief at 18.

[38] Whitney Design *** throughout the period examined: $*** in 2000, $*** in 2001, and $*** in 2002. CR/PR at Table VI-2. In contrast, HPI's *** rose from $*** in 2000 to $*** in 2001, then declined to $*** in 2002. CR/PR at Table VI-2.

[39] See USEC, Inc. v. United States, 132 F. Supp. 2d 1, 12 (Ct. Int'l Trade 2001) ("the *** provision's purpose is to exclude from the industry headcount domestic producers substantially benefitting from their relationships with foreign exporters"), aff'd, Slip Op. 01-1421 (Fed. Cir. Apr. 22, 2002).

[40] There is no issue regarding negligibility; the record suggests that China was the largest foreign source of ironing tables for the 12 months preceding the filing of the petition. Compare CR/PR at Table IV-2 with CR/PR at IV-1 n.1.

[41] CR at II-5 - II-6, PR at II-3 - II-4.

[42] CR at II-1 - II-2, PR at II-1.

[43] CR at II-5, PR at II-3; Tr. at 19 (Mr. Graves), 102 (Ms. Brumm); Petitioner's Postconference Brief at 11.

[44] CR/PR at Table C-1.

[45] CR/PR at Table IV-4.

[46] CR/PR at Table IV-4; see CR at II-5, IV-1 n.1, PR at II-3, IV-1 n.1. There were *** nonsubject imports in 2002 or in the first quarter of 2003, and nonsubject imports were *** in the remainder of the period examined. Nonsubject imports were ***. CR/PR at Table IV-2. These data do not include information obtained from importer ***, which provided a limited and unusable response to the Commission's questionnaire. The inclusion of this information would increase the share of nonsubject imports, consequently lowering both the domestic and subject

(continued...)

capacity to meet the needs of the U.S. market as measured by apparent U.S. consumption, even after the cessation of production by Whitney Design in April 2002.[47]

Contracts are not typically used in the industry. Rather, non-binding agreements with mass retailers provide for a specified volume of certain models to be delivered at a certain price for a fixed term (usually one year).[48] Transactions in the wholesale market are dominated by discrete pricing events such as annual line reviews and e-sourcing (also known as reverse internet auctions), as well as purchaser requests for price adjustments.[49] Because prices are rarely fixed under an agreement, auctions or line reviews do not foreclose price competition until the next event. In addition, lower prices resulting from a negotiation at a line review may not be seen for four to six months, because of an implementation lag. Actual shipments from a December 2002 purchasing agreement, for example, may not begin until June 2003.[50]

There are two major price categories – low-end and high-end merchandise – and producers and purchasers design or buy products to meet particular price points.[51] The higher-end models may be larger than the lower-end ironing tables in terms of width (18 inches versus 14 inches, for example) and include such features as linen racks, iron rests, cord-keeping devices, and the like.[52] Four-leg tables are moderately more expensive than standard T-legs. Mesh-top ironing tables generally are considered to be of higher quality than the perforated-top models, but generally do not command a higher price.[53] Chinese imports originally began as high-end products, but Chinese imports of lower-end ironing tables increased during 2002 and the first quarter of 2003.[54]

As noted above, Whitney Design closed its U.S. manufacturing facility in April 2002 and became solely an importer.[55] The remaining domestic producer, HPI, produces both perforated-top and mesh-top ironing tables, ***.[56] Most, if not all, Chinese ironing tables are of the mesh-top type.[57] The domestic industry views perforated-top and mesh-top as competing directly with one another,[58] and believes the U.S. and Chinese products to be interchangeable, as do the overwhelming majority of importers.[59] Purchasers also believe that the quality of the domestic and Chinese ironing tables generally is

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[46] (...continued)
import market shares. However, there is no indication in the record that nonsubject imports are substantial in comparison to subject imports or shipments of the domestic product. CR at IV-1 n.1, IV-2 n.5, PR at IV-1 nn. 1, 5.

[47] CR/PR at Table C-1. However, the domestic industry's capacity utilization declined throughout the period examined, from *** percent in 2000 to *** percent in 2002 and *** percent in interim 2003, while inventories have risen relative to total shipments (from *** percent in 2000 to *** percent in 2002 and *** percent in interim 2003). CR/PR at Tables III-1, III-4.

[48] CR at I-6, V-2, PR at I-4, V-1 - V-2.

[49] Petitioner's Postconference Brief at 14; CR at I-6, V-2 - V-3, PR at I-4, V-1 - V-2.

[50] CR at V-2 & n.8, PR at V-1 - V-2 & n.8.

[51] CR at II-5 - II-6, V-3, PR at II-3 - II-4, V-2.

[52] Tr. at 38 (Mr. Graves).

[53] CR at II-6, PR at II-4.

[54] CR/PR at Table IV-2. High-end ironing tables are believed to account for less than 15 percent of the U.S. market. Tr. at 44 (Mr. Graves).

[55] CR at II-2, III-1, PR at II-1, III-1.

[56] CR at II-3, PR at II-2.

[57] CR at II-6, PR at II-4.

[58] CR at II-6, PR at II-4.

[59] CR at II-6, II-9, PR at II-4 - II-5.

comparable.[60] Four of six purchasers reported switching suppliers (and country of origin) at least once during the period examined.[61]

V. REASONABLE INDICATION OF THREAT OF MATERIAL INJURY BY REASON OF ALLEGEDLY LESS THAN FAIR VALUE IMPORTS

Sections 733(a) and 771(7)(F)(ii) of the Act direct the Commission to determine whether an industry in the United States is threatened with material injury by reason of the subject imports by analyzing whether "further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted."[62] The Commission may not make such a determination "on the basis of mere conjecture or supposition," and considers the threat factors "as a whole" in making its determination whether dumped imports are imminent and whether material injury by reason of imports would occur unless an order is issued.[63] In making our determination, we have considered all statutory factors that are relevant to this investigation, including the rate of the increase in the volume and market penetration of subject imports, unused production capacity in China, inventories of subject merchandise, prices at which subject imports are likely to enter, and the likely effect of subject imports on the domestic producer's prices and performance. For the reasons discussed below, we determine that there is a reasonable indication that the domestic industry producing ironing tables is threatened with material injury by reason of subject imports from China that allegedly are sold in the United States at LTFV.[64]

The volume and market penetration of subject imports increased rapidly and significantly over the period examined.[65] The quantity of subject imports increased from 207,000 units in 2000 to 725,000 units in 2001, and then climbed to 1.5 million units in 2002. The quantity of subject imports was 233.1 percent higher in interim 2003 (523,000 units) than in interim 2002 (157,000 units).[66] Subject imports gained *** percentage points of market share between 2000 and 2002, rising from *** percent of apparent U.S. consumption by quantity in 2000 to *** percent in 2001 and *** percent in 2002. Subject import market share was *** percent in interim 2003 as compared to *** percent in interim 2002.[67] Subject imports gained market share at the expense of the domestic industry; U.S. producers' market share was *** percentage points lower in 2002 than in 2000, and *** percentage points lower in interim 2003 than in interim 2002.[68]

The recent increase in subject import market share is not solely due to Whitney Design's closure

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[60] CR at II-10, PR at II-6.

[61] CR at II-7, PR at II-5.

[62] 19 U.S.C. §§ 1673b(a) and 1677(7)(F)(ii).

[63] 19 U.S.C. § 1677(7)(F)(ii).

[64] 19 U.S.C. § 1677(7)(F)(i). Factors I (regarding countervailable subsidies) and VII (involving imports of both a raw agricultural product and any product processed from such raw agricultural product) are inapplicable in this antidumping duty investigation.

[65] We note that *** did not respond to the Commission's questionnaire ***. See *** Questionnaire Response. Eight other foreign producers/exporters named in the petition failed to respond to the Commission's questionnaire. CR/PR at VII-1 n.1. Consequently, the volume of subject imports may be underreported.

[66] CR/PR at Table IV-2. The value of subject imports increased from $2.4 million in 2000 to $7.5 million in 2001, then to $12.4 million in 2002. It was $4.2 million in interim 2003 as compared to $1.4 million in interim 2002. CR/PR at Table IV-2.

[67] CR/PR at Tables IV-4, C-1. As measured by value, subject import market share rose from *** percent in 2000 to *** percent in 2001, then to *** percent in 2002. It was *** percent in interim 2003 as compared to *** percent in interim 2002. CR/PR at Table IV-4.

[68] CR/PR at Table C-1. In terms of value, U.S. producers' market share was *** percentage points lower in 2002 than in 2000, and *** percentage points lower in interim 2003 than in interim 2002. CR/PR at Table C-1.

of domestic manufacturing and shift to importing. In 2001, Whitney Design's share of the domestic market was *** percent and subject imports' share was *** percent; subject imports had a *** percent share of the market by interim 2003.[69] In the 12 months from April 2002 through March 2003, Whitney Design's imports of *** ironing tables represented only *** percent of all imports from China and were equal to *** percent of apparent U.S. consumption.[70] Over the same period, imports from China were equal to *** percent of apparent U.S. consumption.[71]

Chinese producers have significant capacity to produce subject merchandise, and their capacity increased throughout the period examined.[72] Reported production capacity increased from 840,000 units in 2000 to 1.5 million units in 2001, then increased further to 3.2 million units in 2002. Capacity to produce subject merchandise was 873,000 units in interim 2003 as compared to 818,000 in interim 2002. Capacity is projected to rise significantly in the future (to 3.8 million units in 2003 and to 5.7 million units in 2004) and *** of the five reporting foreign producers reported greater projected capacity in 2003 and/or 2004 than they reported in 2002.[73]

As the capacity to produce subject merchandise increased for the Chinese producers, so did actual production, which increased from 809,000 units in 2000 to 3.1 million units in 2002. Production totaled 704,000 units in interim 2003 as compared to 591,000 units in interim 2002. Chinese production of ironing tables is projected to be 3.6 million units in 2003 and 5.5 million units in 2004.[74] The record further indicates that China's ironing tables industry is export-oriented and that the United States is a key export market. Further, the available data suggest that there is no significant home market in China for the subject product.[75]

Chinese producers' end-of-period inventories increased from *** units in 2000 to *** units in 2002. Although these inventories decreased *** in interim 2003 as compared to interim 2002 (*** units in interim 2003 and *** units in interim 2002), they are projected to increase to *** units in 2003 and to *** units in 2004.[76] U.S. importers' inventories increased from 43,000 units in 2000 to *** units in 2002, and were 518,000 units in interim 2003 as compared to 174,000 units in interim 2002.[77] In addition, several importers reported importing or arranging for imports of subject product with delivery

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[69] CR/PR at Table IV-4 and Whitney Design's Producer Questionnaire Response.

[70] Compare CR/PR at Table IV-1 with CR/PR at Tables IV-2, IV-4. Whitney Design's U.S. shipments of its imports from April 2002 to March 2003 totaled *** units, which represented *** percent of apparent U.S. consumption. Compare Whitney Design's Importer Questionnaire Response with CR/PR Table IV-4.

[71] Compare CR/PR at Table IV-2 with CR/PR at Table IV-4. U.S. shipments of imports from China supplied *** percent of apparent U.S. consumption from April 2002 to March 2003. CR/PR at Table IV-3.

[72] We note that data on the industry in China may be understated, as eight firms named in the petition did not respond to the Commission's questionnaire. CR/PR at VII-1 n.1.

[73] CR/PR at Table VII-1, CR at VII-3, PR at VII-3.

[74] CR/PR at Table VII-1.

[75] For the five reporting Chinese producers, exports of subject merchandise constituted between *** percent and *** percent of total shipments between 2000 and 2002, and were *** percent of total shipments in interim 2002 and *** percent in interim 2003. Exports to the United States comprised between *** percent and *** percent of total shipments between 2000 and 2002, and were 56.5 percent in interim 2003 as compared to *** percent of total shipments in interim 2002. Exports to the United States are projected to be 54.6 percent of total shipments in 2003 and 44.9 percent in 2004, and are projected to increase by 361,000 units in 2003 (as compared to 2002) and by another 518,000 units in 2004. Home market shipments ranged from *** percent of total shipments in 2000 to *** percent in 2002, and were *** percent in interim 2003 as compared to *** percent in interim 2002. Home market shipments are projected to be *** percent of total shipments in 2003 and *** percent in 2004. CR/PR at Table VII-1.

[76] CR/PR at Table VII-1.

[77] CR/PR at Table VII-2.

effected after March 31, 2003.[78] Finally, we note the Chinese producers have the ability to engage in product-shifting, as *** Chinese producers reported producing other products on the same machinery and equipment used to produce subject ironing tables.[79]

For all the above reasons, we find a likelihood of substantially increased dumped imports of the subject merchandise into the United States for the purposes of this preliminary determination.

We also find that it is likely that subject imports of ironing tables will enter at prices that have significant suppressing and depressing effects on the domestic industry. As noted above, perforated-top and mesh-top ironing tables compete directly in many cases and there is no reported price premium for mesh-top tables with comparable features.[80] As there were no reported subject import sales of the perforated-top ironing tables and the domestic industry sold relatively few mesh-top ironing tables as compared to the subject imports, we compare the pricing data for the two types of tables.[81]

While the majority of the price comparisons between U.S.-produced perforated-top ironing tables (pricing item 1) and imported mesh-top ironing tables (pricing item 2) show margins of overselling by subject imports, we note these margins decreased substantially over the period examined. While there was overselling by subject imports for all quarters between January 2000 and March 2003, the margins decreased from *** percent in January-March 2000 to *** percent in January-March 2003,[82] as the volume of subject imports rose markedly. For comparisons of pricing item 2 alone (for which the volume of domestic product is much lower), the comparisons show margins of overselling falling from *** percent in January-March 2000 to *** percent in April-June 2002, and margins of underselling in the final three quarters (when volume of subject imports rose markedly) ranging from *** percent to *** percent.[83] [84]

We find there is likely to be significant price suppression and depression. In the face of increasing subject imports, the domestic industry was unable to sustain price increases for pricing item 1

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[78] *** reported arranging for the delivery of *** units during April-September 2003; *** reported arranging for the delivery of *** units during April-September 2003; *** provided documentation detailing *** units during April-July 2003; *** stated that it imported subject merchandise on a weekly basis, but was not more specific; *** stated that it had imports after March 31, 2003 or arrangements to import, but provided no specifics; and *** stated that it maintains open purchase orders that are filled by its supplier as current inventory is sold and identified *** units associated with open purchase orders. CR/PR at VII-5. In addition, *** and these items were not expected to be delivered until April 2003 at the earliest. CR at V-17 n.28, V-24 - V-25, PR at V–6 n.28, V-8. It is, however, unclear whether these *** units are included in the *** units mentioned above.

[79] CR/PR at VII-3.

[80] CR at II-6, V-6, V-18 - V-28, PR at II-4, V-4, V-7 - V-8.

[81] See also CR at V-18 - V-22, PR at V-7 - V-9 (lost sales/revenues showing direct competition between Chinese and domestic products). We shall explore further in the final phase of the investigation the probative value of price comparisons between perforated-top and mesh-top ironing tables.

[82] CR/PR at Table V-1.

[83] CR/PR at Table V-2. We note again that the record indicates that there is an implementation lag regarding negotiated prices. For example, ***. The record indicates that the lower winning import bids will not show up in actual shipments and pricing until the second quarter of 2003 at the earliest, and thus will not be reflected in the pricing data in the record of the preliminary phase of the investigation. CR at V-2 n.8, V-17 & n.28, V-24 - V-27, PR at V-2 n.8, V-6 - V-8 & n.28.

[84] While subject imports entered the market in 1998, a substantial portion appear to have been higher-end models. CR at II-3, PR at II-2. However, by 2001 significant volumes of the lower-end models, such as those manufactured by the domestic industry, were being imported, CR at II-3, PR at II-2, and by then the lower-end imports were underselling the low-end domestic product. See CR/PR at Tables V-4 - V-5 (compare prices of products sold by *** with prices of *** products). Yet two importers stated that there has been an increase in demand for higher quality, higher price-point ironing tables with more features. CR at II-5, PR at II-3 - II-4. In the final phase of the investigation we will examine product mix issues. We will also examine whether our pricing items need to be more narrowly defined (to ensure that comparisons are made between products that compete directly with each other).

(the vast majority of the industry's shipments) during the period examined, and prices trended downward toward the end of the period. In fact, domestic prices for pricing item 1 reached their lowest point at the end of the period examined. This occurred while subject import prices declined by approximately *** over the period.[85] Evidence in the record pertaining to the lost sales and revenues and internet reverse auctions also supports our finding,[86] as does the implementation lag regarding negotiated prices.

The record indicates that the likely increased volume of subject imports, and the accompanying likely price effects, likely will adversely impact the domestic industry. While imports rose significantly over the period examined, the domestic industry's U.S. shipments declined steadily. These shipments fell from *** units in 2000 to *** units in 2002; they were *** units in interim 2003 as compared to *** units in interim 2002.[87] U.S. production also decreased over the period: from *** units in 2000 to *** units in 2003; it was *** units in interim 2003 as compared to *** units in interim 2002.[88] The domestic industry's market share also declined, decreasing from *** percent of apparent U.S. consumption, as measured by quantity, in 2000 to *** percent in 2002; it was *** percent in interim 2003 as compared to *** percent in interim 2002.[89]

The domestic industry's capacity also declined, as did capacity utilization. Capacity declined from *** units in 2000 to *** units in 2002, and was *** units in interim 2003 as compared to *** units in interim 2002. Whereas the decline in capacity in 2002 was due to Whitney Design's exit from the market in April 2002 as a producer of ironing tables, as total capacity was *** 2001 *** in 2000,[90] the reduction in capacity utilization began in 2001. Average capacity utilization decreased from *** percent in 2000 to *** percent in 2002, and was *** percent in interim 2003 as compared to *** percent in interim 2002.[91]

Employment indicators also trended downward over the period examined. The number of production and related workers fell from *** in 2000 to *** in 2002, and was *** in interim 2003 as

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[85] CR/PR at Table V-1. Domestic prices for high-volume perforated-top ironing tables rose gradually (by $***) from the first quarter of 2000 through the first quarter of 2001, then *** sank through the second quarter of 2002 (by $***). Prices declined *** thereafter, falling by $*** during the final three quarters of the period examined. Domestic prices for the much lower volume mesh-top ironing tables generally increased throughout 2000-2002, then decreased *** in the first quarter of 2003. CR/PR at Table V-2. Overall, domestic prices for perforated-top ironing tables decreased from $*** in the first quarter of 2000 to $*** in the first quarter of 2003. Domestic prices for mesh-top ironing tables (which accounted for *** percent or less of total shipments of domestic pricing items in each quarter) rose from $*** in the first quarter of 2000 to $*** in the first quarter of 2003. Chinese prices for mesh-top ironing tables decreased from $*** in the first quarter of 2000 to $*** in the first quarter of 2003. CR/PR at Tables V-1 - V-2.

[86] CR at V-18 - V-28, PR at V-7- V-8. For example, *** was accepted. CR/PR at Table V-6, CR at V-22, PR at V-7. ***. CR/PR at Table V-6, CR at V-22, PR at V-7. ***. CR at V-23 - V-24, PR at V-8.

[87] CR/PR at Table III-2. Although we examine the domestic industry in the aggregate, see ALTX, Inc. v. United States, 167 F.Supp.2d 1353, 1369 (Ct. Int'l Trade 2001), we note that the data pertaining to HPI alone also show negative trends. HPI's U.S. shipments declined from *** units in 2000 to *** units in 2002, and were *** units in interim 2003 as compared to *** units in interim 2002. Table C-1-Alternate contained in Staff Worksheet.

[88] CR/PR at Table III-1. HPI's production decreased from *** units in 2000 to *** units in 2002, and was *** units in interim 2003 as compared to *** in interim 2002. Table C-1-Alternate contained in Staff Worksheet.

[89] CR/PR at Table IV-4. HPI's market share declined from *** percent in 2000 to *** percent in 2002, and was *** percent in interim 2003 as compared to *** percent in interim 2002. Table C-1-Alternate contained in Staff Worksheet.

[90] We note that, contrary to respondents' claims, HPI's reported capacity ***. CR/PR at Table III-1 n.1.

[91] CR/PR at Table III-1.

compared to *** in interim 2002. Hours worked fell from *** in 2000 to *** in 2002, and were *** hours in interim 2003 as compared to *** hours in interim 2002.[92]

Indicators of the domestic industry's financial condition also show it is likely to be adversely impacted by increased imports of subject merchandise. While the domestic industry's operating income continues to be healthy, it does not yet reflect the adverse impact of increasing volumes and declining prices of subject imports. However, if current trends continue, there is a reasonable indication that the operating performance of the domestic industry will experience material injury. Operating income increased irregularly over the full years in the period examined, climbing from $*** in 2000 to $*** in 2001, then falling to $*** in 2002. However, operating income was $*** in interim 2003 as compared to $*** in interim 2002.[93] The domestic industry's net sales, in terms of both quantity and value, declined over the period. Net sales fell from *** units in 2000 to *** units in 2002, and totaled *** units in interim 2003 as compared to *** units in interim 2002. The value of net sales fell from $*** in 2000 to $*** in 2002, and was $*** in interim 2003 as compared to $*** in interim 2002.[94] Capital expenditures declined from $*** in 2000 to $*** in 2002.[95] [96]

We note that certain of the conditions of competition applicable to this industry, explained above, intensify the threat of material injury. That is, there is a concentration of purchasers at the wholesale level, which is dominated by a few large mass merchandisers that sell directly to consumers. Further, contracts generally are not negotiated in this industry and sales generally occur pursuant to discrete pricing events and requests for price adjustments. As a result, there is intense direct competition between domestic producers and importers, and the decision of one large buyer to change suppliers as a result of even one line review can have far-reaching consequences for the domestic industry.

Based on the record in the preliminary phase of this investigation, we determine that substantially increased dumped imports are imminent and that the domestic industry likely will continue to lose significant sales volume to dumped imports, and that increased dumped imports will likely cause significant adverse price effects, resulting in a significant adverse impact on the industry.

CONCLUSION

For the reasons stated above, we determine that there is a reasonable indication that the domestic industry producing ironing tables is threatened with material injury by reason of imports from China that allegedly are sold in the United States at less than fair value.

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[92] CR/PR at Table III-3. The number of HPI's production and related workers fell from *** in 2000 to *** in 2002, and was *** in interim 2003 as compared to *** in interim 2002. The number of hours worked by HPI's workers fell from *** in 2000 to *** in 2002, and was *** in interim 2003 as compared to *** in interim 2002. Table C-1-Alternate contained in Staff Worksheet.

[93] CR/PR at Table VI-1.

[94] CR/PR at Table VI-1.

[95] CR/PR at Table VI-3.

[96] We note that the financial data pertaining to HPI alone also show negative trends toward the end of the period examined, when subject imports increased sharply. Its operating income and net sales (both in terms of quantity and value) declined irregularly over the period and *** in interim 2003 as compared to interim 2002. Net sales in terms of quantity fell by *** percent from 2001 to 2002, and were *** percent less in interim 2003 as compared to interim 2002. Net sales in terms of value fell by *** percent from 2001 to 2002, and were *** percent less in interim 2003 as compared to interim 2002. Operating income fell by *** percent from 2001 to 2002, and was *** percent less in interim 2003 as compared to interim 2002. HPI's capital expenditures fell steadily over the period. Table C-1-Alternate contained in Staff Worksheet.

PART I: INTRODUCTION

BACKGROUND

This investigation results from a petition filed by Home Products International, Inc. (HPI), Chicago, IL on June 30, 2003, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value (LTFV) imports of ironing tables and certain parts thereof[1] (ironing tables) from China. Information relating to the background of the investigation is provided below.[2]

Date	*Action*
June 30, 2003	Petition filed with Commerce and the Commission;[3] institution of Commission investigation (68 FR 40683, July 8, 2003)
July 21	Commission's conference[4]
July 25	Commerce's notice of initiation (68 FR 44040, July 25, 2003)
August 13	Commission's vote
August 14	Commission determination sent to Commerce

[1] For purposes of this investigation, the product covered consists of floor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with various features, including iron rests, linen racks, and others. The subject ironing tables may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this investigation. The investigation specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. For purposes of this investigation, the term "unassembled" ironing table means product requiring the attachment of the leg assembly to the top or the attachment of an included feature such as an iron rest or linen rack. The term 'complete" ironing table means product sold as a ready-to-use ensemble consisting of the metal-top table and a pad or cover, with or without additional features, e.g., iron rest or linen rack. The term "incomplete" ironing table means product shipped or sold as a "bare board"--i.e., a metal-top table only, without the pad and cover--with or without additional features, e.g. iron rest or linen rack. The major parts or components of ironing tables that are intended to be covered by this investigation under the term "certain parts thereof" consist of the metal top component (with or without assembled supports and slides) and/or the leg components, whether or not attached together as a leg assembly. The investigation covers separately shipped metal top components and leg components, without regard to whether the respective quantities would yield an exact quantity of assembled ironing tables. Ironing tables without legs (such as models that mount on walls or over doors) are not floor-standing and are specifically excluded. Additionally, tabletop or countertop models with short legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded. Ironing tables were previously imported under statistical reporting number 9403.20.0010 of the Harmonized Tariff Schedule of the United States (HTS). Effective July 1, 2003, ironing tables are imported under new HTS statistical reporting number 9403.20.0011. Metal top and leg components are imported under HTS statistical reporting number 9403.90.8040. Imports of ironing tables from China classified under these item numbers enter free of duty.

[2] *Federal Register* notices cited in the tabulation are presented in app. A.

[3] The petitioner calculated an estimated dumping margin of 59.32 percent. See 68 FR 44040, 44042, July 25, 2003.

[4] A list of witnesses appearing at the conference is presented in app. B.

SUMMARY DATA

A summary of data collected in the investigation is presented in appendix C, tables C-1-C-3.[5] Except as noted, U.S. industry data are based on questionnaire responses of two firms that are believed to account for all of U.S. production of ironing tables during the period reviewed.[6] U.S. imports are based on responses to Commission questionnaires.

THE SUBJECT PRODUCT

The imported products subject to this investigation consist of ironing tables and parts thereof from China, as defined on page I-1 of this report. The subject product does not include table-top or counter-top ironing boards with short legs or over-the-door models. These table-top, counter-top, and over-the-door ironing boards are smaller in size with smaller top surfaces and they need an external support (door, table, or counter). These excluded products are less versatile than floor-standing ironing tables and are intended for more infrequent use in small spaces.[7] Although over-the-door varieties are manufactured by HPI, the Petitioner states that table- and counter-top ironing boards are not produced domestically. Full-size, free-standing, metal-top ironing tables are currently produced in China, in Europe (high-end models only), and by HPI in the United States.

DOMESTIC LIKE PRODUCT ISSUES

The Commission's determination regarding the appropriate domestic products that are "like" the subject imported products is based on a number of factors including (1) physical characteristics and uses; (2) common manufacturing facilities and production employees; (3) interchangeability; (4) customer and producer perceptions; (5) channels of distribution; and, where appropriate, (6) price, all of which are discussed in the section below. No party has argued that any of the nonsubject ironing tables (over-the-door/wall-mounted being the only type reported produced in the United States) should be part of the domestic like product for purposes of the preliminary phase investigation. However, respondents Whitney Design and Bajer Design and Marketing state that should this case go into a final phase, the Commission should examine whether to include over-the-door/wall-mounted ironing tables as part of the domestic like product.[8] Producers and importers were asked a series of questions concerning the above-mentioned six factors that the Commission considers in its domestic like product determination. Their responses to these questions are presented in appendix D.

Physical Characteristics and Uses

Metal-top ironing tables are used in households, hotel rooms, and workplaces for the purpose of pressing apparel and other textile items. There are several varieties of ironing boards: (1) entry-level T-leg ironing boards sold on promotion at $10-$15; (2) standard ironing boards with 4 legs sold in the $20-

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[5] HPI also produces over-the-door ironing tables of the type excluded from the scope of the investigation; a summary of data concerning these and other nonsubject types of ironing tables (e.g., counter-top and table-top models) is shown in app. table C-2, while data concerning both subject ironing tables and nonsubject types of ironing tables, combined, are presented in app. table C-3.

[6] Whitney Design, Inc. ceased ironing table production in April 2002.

[7] Petitioner, postconference brief, p. 8.

[8] Whitney Design, Inc.; Polder, Inc.; Bajer Design and Marketing, Inc.; and Lerado (Zhongshan) Industrial Co., Ltd. (Whitney, Polder, et al.), postconference brief, p. 17.

$25 range; (3) mid-price ($30-$50) ironing tables, which are often longer, wider, or built with heavier construction and have additional features such as a clothes rack; and (4) upper-end ironing tables with multiple features that retail for $75-$120.[9]

The subject product is made primarily of cold-rolled flat steel and wire, as well as fasteners, foam, corrugated carton, shrink film, and cotton fabric.[10] The principal components of an ironing table are: (1) the metal ironing surface, (2) a set of metal tracks, (3) legs, (4) a folding mechanism, (5) an ironing board pad, and (6) a cover. The metal legs of an ironing board are generally in either a T-leg or a 4-leg design. A T-leg is made of a single metal tube inserted into a metal leg base that is shaped as an inverted "T". A 4-leg ironing board has 2 legs, each made of 2 metal tubes than run parallel to each other, flare out to form a 4-footed base on the floor, and typically have a cross brace at or near the flare or at the end of the tubes. In each system, users press a lever that allows the legs to drop down and subsequently raise the height of the board or fold flat for storage.

Manufacturing Facilities and Production Employees

The production of ironing boards involves common capital equipment such as a metal roll-former, die press, drill press, welding equipment, and painting facilities. The metal top may be formed by various processes, including pressing, stamping, and punching. Much of the production may also be accomplished by hand, with tools such as hand benders and welders, wire cutters, metal shears, and a sewing machine for covers.[11]

According to the petitioner, in this production process, flat-rolled steel is first formed into various parts. In a perforated-style top, flat-rolled steel is pressed by a die to form the top. However, for a mesh style top, steel is processed through a metal expanding machine and then is cut into the top shape by a die. The rim is then crimped and the parts joined through welding. This metal ironing surface is then welded to a set of tracks that run the full length of the board. The legs are made when the steel is made into tubing and are then attached together. The tops and legs are painted, are brought to a gas oven to cure the paint, and are then attached together. The pad and cover can then be added to the ironing table before it is shrink-wrapped and packed in a carton.

Both standard and higher-end ironing tables are produced in the same manufacturing facilities, using common manufacturing processes and common manufacturing employees.[12] Capital improvements and constant innovation and product enhancements are important in this industry, as slight product differentiation can set one company apart from other manufacturers.[13]

Interchangeability and Customer and Producer Perceptions

Petitioner states that "the overall production process in China is very similar" to that in the United States, although it is likely that Chinese manufacturers rely less on capital equipment and more on labor-intensive hand processes.[14] Petitioner further states that although there may be variations in the production techniques, the quality of ironing tables produced in China is comparable to that produced in

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[9] Conference transcript, pp. 78-79 (Scott).

[10] A basic metal-top, T-leg ironing table uses 9 to 10 lbs. of steel. Petition, p. 6.

[11] Petition, p. 4.

[12] Whitney, Polder, et al., postconference brief, July 24, 2003.

[13] Conference transcript, p. 103 (Brumm).

[14] Conference transcript, p. 7 (Graves).

the United States.[15] Also, brand name is not a primary purchasing consideration for ironing boards, as many of the retail brands have developed their own brands for the category.[16]

One customer notes that Chinese ironing tables are nearly all of mesh-top design, compared with the domestic product which consists largely of perforated-top tables.[17] Some consumers consider the mesh-top ironing boards to be an improvement over the traditional perforated tables, as the mesh top allows steam to penetrate through more easily, allowing garments and other items to be ironed faster.[18] However, a customer buying an ironing table (usually already with a pad and cover) may not notice the difference.[19] Another factor for differentiation may be whether the ironing board comes with a pad and cover; 95 percent of the tables on the market today have cover and pad installed.[20] T-leg and 4-leg ironing tables may also compete with each other.[21] Even with these variations, petitioner, importers and customers all agree that ironing tables produced in China are interchangeable with those produced in the United States.[22]

Channels of Distribution

Free-standing metal-top ironing tables are sold by the domestic producers and importers to mass retail stores such as K-Mart, Wal-Mart, Sears, Target, and Family Dollar, as well as to distributors servicing the hospitality/hotel market. In the past, non-binding agreements with mass retailers provided for a specified volume of certain models to be delivered at a set price for a fixed term (usually one year).

More recently, online reverse auctions have also been used.[23] Ironing boards are sometimes bundled and sold with other products, such as irons and other household items.[24]

Price

Price is one of the most important considerations in purchasing an ironing board. According to the petitioner, the retail price of a basic T-leg metal ironing board, comprising 75 percent of the market, is $9 to $15.[25] Petitioner has identified a Chinese export price of $5.10 per unit for a mesh-top T-leg ironing table in March 2003, contrasted with the "normal" value of $7.68 identified by the petitioner.[26] Polder argues that the price can vary, depending on the type of ironing table, from about $10 to about $120.[27]

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[15] Ibid., pp. 7-8 (Graves).

[16] Ibid., p. 43 (Graves).

[17] Ibid., p. 101(Brumm).

[18] Ibid., p. 109 (Brumm).

[19] Ibid., pp. 110-111 (Glenn).

[20] Ibid., p. 116 (Glenn).

[21] Ibid., p. 120 (Glenn).

[22] Various postconference briefs.

[23] Reverse auctions involve vendors bidding against each other at decreasing sales prices. Such auctions typically involve offering a weighted-average price for a package of specified models and quantities. Petition, p. 8.

[24] Conference transcript, pp. 11-12 (Perry).

[25] Ibid., p. 45 (Graves).

[26] Petition, pp. 16, 26.

[27] Conference transcript, pp. 78-79 (Scott).

PART II: CONDITIONS OF COMPETITION IN THE U.S. MARKET

U.S. MARKET SEGMENTS AND CHANNELS OF DISTRIBUTION

Ironing tables are classified by type of top (mesh or perforated), by type of legs (T-legs or 4-leg) and by other, high-end, features. Mesh-top ironing tables are generally considered higher quality than perforated-top ironing tables, but the distinction does not draw a higher price. Most ironing tables (approximately 85 percent) are standard "T-legs" or moderately more expensive standard "4-legs" designed to be bought as event-driven or impulse purchases and used for many years.[1] Chinese imports originally began as higher end products for the smaller (approximately 15 percent of the U.S. market), higher-end market segment, including segments supplied by HPI with Chinese imports. ("Higher-end" ironing tables are tables with more features or greater size.) However, Chinese imports of the more standard ironing tables have increased during 2002 and 2003.[2]

During the period examined, HPI and Whitney Design were the sole U.S. producers of ironing tables in the U.S. market, and supplied most of the market. Whitney Design ended U.S. production in 2002 and now imports ironing tables from China. To some extent, different producers and importers have different emphases among the types of ironing tables (standard versus high-end). *** mostly sell standard ironing tables to mass merchandisers, while *** emphasize sales of higher end ironing tables to specialty stores.[3]

The largest group of ironing table purchasers by volume are mass merchandisers such as Wal-Mart, Target, and K-Mart. Most sales of ironing tables are directly to these retailers, which then sell directly to consumers. Nonetheless, there are some distributors, such as ***. Other purchasers include hardware stores, hotels,[4] home improvement stores, and other discount stores. There has been a substantial decrease in the number of retailer purchasers in the last few years, with department stores such as Ames, Bradley, Caldor, Service Merchandiser, and Venture exiting the market, and K-Mart entering bankruptcy (and hence closing a number of stores).[5]

SUPPLY AND DEMAND CONSIDERATIONS

U.S. Supply

Domestic Production

Based on available information, U.S. ironing table producers are likely to respond to changes in demand with moderately large changes in the quantity of shipments of U.S.-produced ironing tables to

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[1] Conference transcript, pp. 20 and 42 (Graves) and 120-121 (Glenn and Boltuck). In addition, ***.

[2] All the producers and importers who responded to Commission questionnaires reported that they sold ironing tables throughout the entire United States, except for ***.

[3] Polder described its customers as big box specialty stores (e.g., Bed Bath & Beyond, the Container Store, etc.) that are different from the larger mass merchandisers in that they sell to customers willing to pay more for more features. Polder said that it does not compete with HPI in the standard or lower-end ironing tables. Conference transcript, pp. 84-86 (Scott).

[4] Hotels tend to buy through one distributor, ***, and account for less than *** percent of *** sales. The major mass merchandisers are an overwhelming majority of the market; ***. Staff conversation with ***. Polder described hotel customers as wanting lower priced ironing tables. Conference transcript, p. 79 (Scott).

[5] Conference transcript, pp. 72-73 (Glenn).

the U.S. market. The main contributing factor to the moderately high degree of responsiveness of supply is the availability of unused capacity.

HPI is the sole remaining U.S. producer of ironing tables. It also produces nonsubject ironing tables, some of which (e.g., over-the-door ironing tables) are patented by it.[6] HPI describes production as a capital intensive process in the United States, but also stated that many metal stampers and formers would be able to copy the basic technology.[7] Whitney Design closed its U.S. production capacity in 2002, and sold its production equipment. It stated that it did so because of low pricing due to its sole competitor, HPI, and not due to competition with other importers of Chinese ironing tables. It further described its plant closing as irreversible, with much of the equipment now destroyed or sold.[8]

HPI produces both perforated-top and mesh-top ironing tables. ***. (See Part V for more data on mesh-top versus perforated-top sales).

Industry capacity and inventory levels

HPI's capacity has been *** since January 2000. It opened some capacity ***.[9] Capacity utilization, however, showed a drop in 2002 and the first three months of 2003. HPI's inventory levels showed *** increase in 2002.

Alternative markets and production alternatives

* * * * * * *

Subject Imports

Based on available information, the Chinese producers are likely to respond to changes in demand with moderately large changes in the quantity of shipments of ironing tables to the U.S. market. The main contributing factors to the moderately high degree of responsiveness of supply are a growing capacity that has not yet shown any tangible signs of slowing imports to the United States, the existence of alternative markets, and alternative products that could be produced on the same equipment.

Chinese ironing tables began entering the U.S. market recently, and at first were concentrated in the higher-price, lower-volume niches. Bajer said that when it began importing Chinese ironing tables in 1998, it was aware of only itself and Ironees as importers of small volumes of Chinese ironing tables.[10] However, HPI stated that by 2001, Chinese ironing tables were becoming a substantial part of the more standard ironing table market as well.[11] HPI reported that, starting in 2001, it has supplemented its U.S. production with some imports of low-volume, high-end ironing tables from China because capital cost requirements make U.S. production infeasible. It added that it had begun to ***, due to price competition from other importers of Chinese ironing tables.[12]

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[6] Conference transcript, p. 103 (Brumm).

[7] Conference transcript, pp. 19 (Graves) and 36 (Bradley).

[8] Conference transcript, pp. 70-71 (Glenn).

[9] See staff conversation with ***.

[10] Conference transcript, pp. 84-85 (Kellogg).

[11] Conference transcript, pp. 21-25 (Graves).

[12] Conference transcript, pp. 22, 25 (Graves) and response to Commission questionnaires. See also petitioner's postconference brief, exh. 2.

Industry capacity, inventories, production alternatives, and alternative markets

Chinese capacity has risen *** since January 2000, but reported capacity utilization remains ***. Respondents stated that Chinese producers ***, which account for approximately *** percent of Chinese exports to the United States, have substantial exports to other countries, and will be focusing their future exports more on these non-U.S. markets.[13] Chinese inventories as a share of both production and shipments fell continually through March 2003.

***.[14] HPI also said that a typical Chinese metal former would be able to move from other products (e.g., folding tables and chairs) to ironing tables.[15] Respondents stated that higher shipping costs and a recent safeguard case in China (which they said would result in increased prices for steel in China) would restrain Chinese exports or raise their prices over the next year.[16]

Nonsubject Imports

HPI described imports of ironing tables from nonsubject countries as minimal. It added that, besides Chinese ironing tables, it was only aware of European (***) ironing tables, which it described as being sold into high-end markets at a ***.[17]

U.S. Demand

Demand Characteristics

HPI described demand for ironing tables as inelastic at the consumer level. HPI said that ironing table demand is based around home purchases and household formation, meaning purchases are infrequent and not price dependent. The long-lasting nature of ironing tables also makes consumers less likely to purchase one because of moderate price declines. However, HPI did say that there is some seasonality (with more promotions in later summer during the back-to-school period).[18] However, there can also be heavy price competition at the sales-to-retailers level, since mass merchandisers typically only stock one brand of each type of ironing board they stock (i.e., T-leg, 4-leg, etc.).[19]

HPI described the U.S. ironing table market as a mature market characterized by moderate demand growth of 1-4 percent annually.[20] However, importer Whitney Design stated that several factors were working to restrain current demand at the consumer level. It cited market satiation due to continued low HPI prices since 1998, competitively-priced substitute products, workplace trends toward more casual and wrinkle-free clothing, and a growing consumer preference, even at mass merchandisers, for higher-end ironing tables instead of the lower-end, traditional T-legs and 4-legs.[21] *** also noted an

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[13] Postconference brief of Whitney, Polder, et al., pp. 39-40.

[14] Staff conversation with ***. ***.

[15] Conference transcript, p. 36 (Bradley).

[16] Conference transcript, pp. 127-128 (Boltuck, Perry and Wisla). ***.

[17] Conference transcript, p. 21 (Graves) and response to Commission questionnaires.

[18] Conference transcript, p. 20 (Graves), p. 32 (Bradley) and p. 40 (Graves).

[19] Conference transcript, pp. 135-136 (Brumm).

[20] Conference transcript, pp. 19-20 (Graves).

[21] For example, conference transcript, pp. 67, 71-72 (Glenn). However, petitioners responded that the demand data do not show a spike up in units sold and then a drop (as would be expected from the respondents' allegation of

(continued...)

increase in demand for higher quality, higher-price-point ironing tables with more features. Polder added that mass merchandisers are moving toward selling more expensive, more feature laden models as well, and cited K-Mart's use of HPI's Chinese-made ironing tables in its Martha Stewart line.[22] However, *** stated that there had not been any significant changes in demand, and *** stated that demand at its stores had increased in the United States.[23]

Substitute Products

*** reported that the primary substitutes for ironing tables are nonsubject ironing tables, such as wood-top tables, built-in cabinet style ironing tables, wall-mounted ironing tables, etc. At the conference, Whitney Design described these new styles of ironing tables, both in the low end (e.g., table top boards) and at the high end (e.g., chrome legged boards) as cutting into traditional ironing table demand.[24] However, four importers *** said that there were no substitutes for subject ironing tables.

SUBSTITUTABILITY ISSUES

Most HPI ironing boards are perforated-top, while Chinese boards are mesh-top. While HPI stated that these products compete directly, importers stated that mesh top products are of superior quality because they provide a faster ironing surface.[25] However, mesh- and perforated-top ironing tables still generally sell for the same price.[26] Furthermore, HPI described mesh-top and perforated-top tables as directly competing with each other.[27] Respondents stated that while consumers may not know the difference between a mesh-top ironing table and a perforated-top ironing table, they might be able to distinguish the effectiveness of one bought at a particular retailer, hence making quality important to retailers.[28]

Factors Affecting Purchasing Decisions

U.S. Purchasers

The Commission sent abridged questionnaires to nine purchasers of ironing tables, and received responses from ***. All but *** had purchased both U.S. and Chinese ironing tables,[29] although *** no longer purchased U.S. product. Altogether, responding purchasers accounted for nearly 65 percent of the ironing tables consumed in the United States. The largest purchaser which has not yet responded to Commission questionnaires is ***.

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[21] (...continued)
saturation). Conference transcript, pp. 54-55 (Bradley).

[22] Conference transcript, p. 80 (Scott).

[23] Questionnaire responses.

[24] Conference transcript, p. 72 (Glenn) and pp. 93-94 (Boltuck).

[25] Conference transcript, pp. 44 (Graves) and 109-110 (Brumm and Lehrman).

[26] Conference transcript, p. 111 (Glenn).

[27] Conference transcript, p. 42 (Graves). There is also evidence of this direct competition between mesh-top and perforated-top in the *Lost Sales and Lost Revenues* section.

[28] Conference transcript, pp. 121 (Boltuck) and 133 (Brumm).

[29] ***.

When asked if their relative shares of purchases from one country or one supplier had changed in the last three years, *** had stayed with domestic production for the entire period while *** had all switched suppliers (and country of origin) at least once.

*** stated that it had reduced purchases from the U.S. and *** and increased purchases from China. It explained that it had found *** willing to work with it on quality, design innovations, and value, and that it had also switched ***. When asked if it had switched suppliers, *** cited switching from *** to *** to introduce ***, and replacing *** with *** due to better cost and quality. ***.

*** said that it had maintained the same *** suppliers, ***, but had increased its purchases of U.S. ironing tables and decreased its purchases of Chinese ironing tables because of lower U.S. prices and increasing Chinese prices.

*** stated that it had dropped *** because of better pricing from ***, and that then it had dropped *** and replaced it with *** for the same reason. Furthermore, *** reported dropping *** because of quality and price, and adding *** for the same reason.

Importance of Factors and Qualification

Petitioner stated that qualification usually takes place before an on-line auction, or during an annual line review. In a line review, the supplier will bring samples to a purchaser and then negotiate price.[30] It added that brand name is typically not an important purchasing factor for retailers or the ultimate consumers, especially in the standard ironing tables category.[31] Target stated that it looks for ironing boards with the most innovative features at the lowest cost to differentiate itself in what it called a mature market. Target said that it found Chinese product to be more competitive because it has structural design enhancements and a mesh design.[32]

When asked how often they purchase the lowest price ironing table available, *** said "usually" and two, ***, said "sometimes." Whitney Design stated that price is not always the determining factor in purchasers' choice of supplier. It cited just-in-time delivery, vendor managed inventories, high quality, reliable and experienced suppliers, differentiated features, and product innovation as factors that could determine purchasing decision, along with price "in a competitive range."[33] Polder stated that price is not the major consideration in on-line auctions, but instead brand, quality, and ability to meet specifications played important roles.[34]

Lead Times

*** reported lead times of 5-7 days ***. *** reported lead times of 1-14 days, *** reported 20 days, *** reported 15 work days, *** reported 3 weeks, *** reported 45 days, and *** reported 7 days.

Comparisons of Domestic Products, Subject Imports, and Nonsubject Imports

Producers and importers were asked to assess how interchangeable ironing tables from the United States were with ironing tables from China. *** felt that U.S. and Chinese ironing tables were interchangeable, as did ***. *** stated that while both U.S. and Chinese ironing tables have the same

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[30] Conference transcript, pp. 22-23 and 43 (Graves).

[31] Conference transcript, pp. 43 and 58 (Graves).

[32] Conference transcript, pp. 101-103 (Brumm).

[33] Conference transcript, p. 73 (Glenn).

[34] Conference transcript, p. 81 (Scott).

end use, U.S. tables do not perform as well because they are less likely to be manufactured with mesh tops.

Producers and importers were asked if differences other than price were significant in sales of ironing tables from the United States or China. HPI said that its advantage as a domestic producer was ***. *** stated that differences other than price were not significant in sales of ironing tables from the United States or China and *** said that they generally had the same function, but *** other importers disagreed. *** stated that each producing factory provides different quality and design. In particular, it cited *** as making substantial quality improvements without request. It *** that purchasing domestically provided a shorter lead time. *** stated that its ironing tables are distinguishable for their better quality, larger size, and creative and patented features. *** stated that most of its products are designed specifically for *** or its customers, with product differentiation through quality and additional features. It added that the higher prices of its boards reflect these quality and feature differences. Finally, *** stated that Chinese ironing tables are higher quality than U.S. ironing tables in areas including welding, painting, bending, stamping, and packaging, with U.S. product having the advantage only in lead time.

Summaries of purchaser comparisons of domestic and Chinese ironing tables are presented in table II-1. Based on responses in this preliminary phase of the investigation, U.S. and Chinese ironing tables appear generally comparable.

Table II-1
Ironing tables: Number of purchasers' comparisons of U.S. product and imports

Factor	U.S. vs. China		
	S	C	I
Availability	0	3	1
Delivery terms	0	4	0
Delivery time	1	2	1
Discounts offered	0	4	0
Lower price[1]	2	0	2
Minimum quantity requirements	1	3	0
Packaging	0	4	0
Product consistency	0	4	0
Product quality[2]	0	3	1
Product range	0	4	0
Reliability of supply	0	3	1
Transportation network	1	3	0
U.S. transportation costs	1	3	0

[1] A rating of superior means that the price is generally lower. For example, if a firm reports U.S. superior, it means that the price of the U.S. product is generally lower than the price of the imported product.
[2] Purchaser *** marked U.S. and Chinese boards as of "comparable" quality, but then added another category ("quality of board") and marked U.S. as inferior. On this basis, its answer here was counted as inferior.

Note.–S=first named source superior, C=products comparable, I=first named source inferior. *** did not respond to this question, so there are only four responding purchasers in this table.

Source: Compiled from data submitted in response to Commission questionnaires.

PART III: U.S. PRODUCERS' PRODUCTION, SHIPMENTS, AND EMPLOYMENT

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the alleged margins of dumping was presented earlier in this report and information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V. Information on the other factors specified is presented in this section and/or Part VI and is based on the questionnaire responses of two firms that are believed to account for all U.S. production of ironing tables during the period examined.

Both producers have experienced ironing table plant closures since January 1, 2000; these producers attribute these closures to price competition in the U.S. market. The petitioner reports opening a new plant to produce ironing tables in El Paso, TX, in January 2000 . This production was terminated and certain production equipment from this facility was relocated to its Seymour, IN, plant in the first quarter of 2001, ***. The company is currently in the process of ***.[1] The other producer, Whitney Design, closed its St. Louis ironing table production facility in April 2002, as it was ***. Whitney Design attributes the closure of its U.S. production facilities to price competition from reportedly aggressive pricing tactics that HPI began in 1998.[2] Whitney Design, which is ***-owned by Tricor Consumer Products, Inc., opposes the petition.

Producers' capacity, production, and capacity utilization of ironing boards are shown in table III-1. Neither producer reported sales of parts of ironing boards.[3] Production and capacity utilization declined throughout the period examined while reported capacity *** during 2000-2001 and then decreased from 2001 to 2002 and between the interim periods, reflecting the closure of Whitney Design's production facilities.

Table III-1
Ironing tables: U.S. production capacity, production, and capacity utilization, by firms, 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

U.S. shipments decreased throughout the period examined, particularly in 2002 and interim 2003, reflecting the closure of Whitney Design. Export shipments, which peaked in 2001, decreased in both 2002 and between the interim periods. Shipments of U.S. producers are shown in table III-2.

Table III-2
Ironing tables: U.S. producers' shipments, by types, 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

Employment-related data of U.S. producers of ironing tables are shown in table III-3. Tracking the decline in production, the number of production and related workers, hours worked, wages paid, and unit labor costs decreased from 2000 to 2002, and were lower in interim 2003 than in interim 2002; productivity, however, increased from 2000 to 2002, and also increased between the interim periods.

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[1] Telephone conversations with Fred Ikenson on July 28, 2003, and *** on August 11, 2003. ***.

[2] See, conference transcript, pp. 10-11 (Perry) and 67-68 (Glenn).

[3] ***.

Table III-3
Ironing tables: U.S. production and related workers, hours worked and wages paid to such workers, and productivity and unit labor costs, 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

End-of-period inventories of U.S.-produced ironing tables are presented in table III-4. Such inventories decreased from the period high in 2000 to the period low in 2001 and then increased in interim 2002 and increased further by yearend 2002. Inventories then fell in interim 2003 to a level below that of interim 2002. Inventories as a ratio to production and shipments fluctuated throughout the period examined.

Table III-4
Ironing tables: End-of-period inventories held by U.S. producers, and ratios of inventories to production and to shipments, by type, 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

PART IV: U.S. IMPORTS, APPARENT U.S. CONSUMPTION, AND MARKET SHARES

U.S. IMPORTERS

The Commission sent importers' questionnaires to the 13 firms identified in the petition. The Commission received usable data on imports of ironing tables from eight companies.[1] Petitioner HPI and Whitney,[2] a former U.S. producer of ironing tables, reported subject imports during the period examined. These firms' production, imports, and ratio of imports to production are presented in table IV-1.

Table IV-1
Ironing tables: U.S. producers' production, imports of subject product, and ratio of imports to production, by firm, 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

U.S. IMPORTS AND U.S. CONSUMPTION

Data in this section regarding the quantity and value of U.S. imports of ironing tables[3] are based on responses to Commission questionnaires of the eight firms that provided usable data. These data are shown in tables IV-2. Reported imports of ironing tables from China and from all sources, combined, increased continually throughout the period examined while imports from all other sources decreased.

U.S. shipments of domestic ironing tables, U.S. shipments of imports, and total U.S. consumption are shown in table IV-3 and market shares are shown in table IV-4.

According to petitioner, in 2000, Chinese imports of ironing tables held about 3 percent of the U.S. market but by the end of 2003, it expects the Chinese share will approach 50 percent.[4] According to responses to the Commission's questionnaires, imports from China, as well as U.S. shipments of those imports increased continually throughout the period examined. Likewise, market penetration by Chinese ironing tables increased from *** percent in 2000 to *** percent in 2001, and *** percent in 2002, and also increased between the interim periods from *** percent in interim 2002 to *** percent in interim 2003.[5]

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[1] These firms are ***; ***; Bajer Design and Marketing, Inc.; HPI; the Ironees Co.; Polder Inc.; Target Corp.; and Whitney Design, Inc., all of which imported subject product from China. Also *** imported ironing tables from Mexico. Petition, p. 13; conference transcript, pp. 84-85 (Kellogg and Boltuck); notice of appearance filed on behalf of Target Corp., July 15, 2003; and importer responses. An additional importer of subject product, ***, provided only limited information concerning its imports from China (reportedly limited to ***) and the Netherlands (***). The Commission received negative importer questionnaire responses from three firms named in the petition: ***. One firm identified by petitioner as an importer of ironing tables, ***, has not responded to the Commission's questionnaire; ***.

[2] Whitney Design, Inc. ceased ironing table production in April 2002.

[3] Although *** erroneously reported imports of parts of ironing tables (these data were duplicates of the data on imports of complete ironing tables), there are no confirmed reported imports of parts of ironing tables. Both petitioner and respondents agree that there are no imports of parts of ironing tables. Petition, p. 13 at n. 8; Whitney, Polder et al postconference brief, p. 17.

[4] Conference transcript, p. 9 (Ikenson).

[5] As previously noted, the data shown do not include the unusable response of ***, the inclusion of which would increase the share of nonsubject imports, thereby lowering both domestic share and subject import share.

Table IV-2
Ironing tables: U.S. imports, by sources, 2000-2002, January-March 2002, and January-March 2003

Source	Calendar year			January-March	
	2000	2001	2002	2002	2003
			Quantity (*1,000 units*)		
China	207	725	1,543	157	523
All other sources	***	***	***	***	***
Total	***	***	***	***	***
			Value (*1,000 dollars*)[1]		
China	2,359	7,452	12,437	1,421	4,199
All other sources	***	***	***	***	***
Total	***	***	***	***	***
			Unit value (*per unit*)[1]		
China	$11.39	$10.27	$8.06	$9.03	$8.03
All other sources	***	***	***	***	***
Average	***	***	***	***	***
			Share of quantity (*percent*)		
China	***	***	***	***	***
All other sources	***	***	***	***	***
Total	100.0	100.0	100.0	100.0	100.0
			Share of value (*percent*)		
China	***	***	***	***	***
All other sources	***	***	***	***	***
Total	100.0	100.0	100.0	100.0	100.0

[1] Landed, duty-paid.

Note.–Because of rounding, figures may not add to the totals shown.

Source: Compiled from information submitted in response to Commission questionnaires.

Table IV-3
Ironing tables: U.S. producers' U.S. shipments, U.S. shipments of imports, by sources, and apparent U.S. consumption, 2000-2002, January-March 2002, and January-March 2003

Item	Calendar year			January-March	
	2000	2001	2002	2002	2003
			Quantity (*1,000 units*)		
U.S. producers' shipments	***	***	***	***	***
U.S. shipments of imports from--China	185	607	1,315	139	381
All other sources	***	***	***	***	***
Total import shipments	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***
			Value (*1,000 dollars*)		
U.S. producers' shipments	***	***	***	***	***
U.S. shipments of imports from--China	2,930	7,874	12,174	1,852	3,733
All other sources	***	***	***	***	***
Total import shipments	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***

Note.–Because of rounding, figures may not add to the totals shown.

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-4
Ironing tables: Apparent U.S. consumption and market shares, 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

Information concerning the ratio of subject imports to U.S. production of ironing tables is presented in the following tabulation.

Item	Calendar year			January-March	
	2000	2001	2002	2002	2003
Subject imports (*1,000 units*)	207	725	1,543	157	523
U.S. production (*1,000 units*)	***	***	***	***	***
Ratio of subject imports to production (*percent*)	***	***	***	***	***

PART V: PRICING AND RELATED INFORMATION

FACTORS AFFECTING PRICES

Transportation Costs to the U.S. Market

Using data from April 2002 to March 2003, it is estimated that transportation costs for Chinese ironing tables to U.S. ports are equivalent to 16.4 percent of customs value.[1] Foreign freight costs for ironing tables can be substantial (ironing tables are heavy and bulky), and petitioner attributed the low level of European imports to high freight costs.[2] Respondents stated that freight costs have risen recently, adding as much as 52 cents per piece or $1,000 per container.[3]

U.S. Inland Transportation Costs

*** estimated transportation costs at 10 percent of delivered cost, while *** estimated total transportation costs at 27 and 34 percent, respectively.[4] Most suppliers stated that the purchaser arranges transportation, except ***, which said that they arrange transportation at least some of the time.

Exchange Rates

The nominal value of the Chinese yuan relative to the U.S. dollar has remained virtually unchanged since the first quarter of 1997 at 8.28 yuan per dollar. Producer price data for China are not available; therefore, real exchange rates cannot be calculated.

PRICING PRACTICES

Pricing Methods

Most producers and importers reported that 100 percent of their sales were spot sales, although *** reported 50 percent contract sales and *** reported 90 percent contract sales. HPI described price setting in the ironing tables industry as a series of "discrete" events rather than a process of continuous change. While there are few contracts, prices tend to be set or changed at specific times (such as annual line reviews or purchaser requests for price adjustments) and then maintained at those levels for a longer period (several months to a year).[5] However, because prices are rarely fixed under an agreement,

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[1] This estimate is derived from official import data (using HTS statistical reporting number 9403.20.0010) and represents the transportation and other charges on imports valued on a c.i.f. basis, as compared with customs value. This HTS category, "household metal furniture," is substantially broader than just ironing tables, but probably acts as a reasonable estimate of the transportation costs for ironing tables as well.

[2] Conference transcript, p. 21 (Graves).

[3] Conference transcript, pp. 97 and 124 (Boltuck) and postconference brief of Whitney, Polder, et al., p. 12. Petitioner described the recent increase in ocean freight costs as "temporary and modest" and pointed out that the current transportation cost is within the range of ocean freight costs over the last four and a half years. Petitioner's postconference brief, pp. 33-34, and staff conversation with ***.

[4] ***. Staff conversations with ***.

[5] Conference transcript, pp. 15 and 31 (Bradley) and responses to Commission questionnaires.

auctions or line reviews "do not foreclose competition until the next event."[6] At the conference, HPI described agreements as "implied contracts" based on an estimated annual volume at a particular price.[7] *** stated that "contract" in the ironing table industry is often defined as just a pricing agreement, but no signed performance issues are involved. Moreover, according to petitioner, lower prices resulting from a negotiation at a line review may take 4-6 months to show up due to "implementation lag," i.e., actual shipments from a December 2002 auction may not begin until June of 2003.[8]

*** described typical purchase patterns for ironing tables as falling into the categories of straight single purchase (rare because purchasers want price commitments), annual line reviews (the most popular method), reverse auctions, and competitive line reviews (like a reverse auction but done in person).[9]

HPI reported that sales are commonly completed at annual line reviews that include quality and other considerations. *** also described annual line reviews as including pre-qualification and then meetings between suppliers and purchasers to negotiate price.[10] The bidding process is based on estimated annual volumes by model.[11] However, annual line reviews are used more for larger customers rather than for all customers.[12] The typical bidding at an annual line review will result in a quantity commitment, but no explicit contract.[13] Typically, a retailer will buy only one type of ironing table per supplier. Thus, the bidding at annual line reviews determines the sole supplier of each particular ironing table product (e.g., T-leg, 4-leg, etc.) that any particular purchaser will offer for retail sale.[14]

The reverse auction, a procedure growing in popularity among ironing board purchasers, is described by *** as similar to an annual line review process (with prequalification), but with price negotiation done over the internet. Indeed, Target described its reverse auction as merely the last step in its annual line review process, preceded by extensive quality checks.[15] Data received by the Commission indicates that since January 2000, *** conducted *** reverse internet auctions, and *** conducted ***. Parties to the investigation also supplied information on some of these reverse auctions, which are discussed in more detail later in this chapter.

Several parties reported that they buy or design products to meet particular price points (e.g., approximately $13.00 for a standard ironing table,[16] etc.) at retailers. *** reported that it designed its products this way, taking into account a minimum percentage gross margin. ***.

Respondents stated that pricing often involves "bundling" with other products as well, especially in sales to customers of many laundry products, which they estimated as 10-15 percent of sales. Bajer said that it would often take lower prices on ironing tables (due to competition with HPI) in order to

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[6] Postconference brief of Target, p. 11.

[7] Conference transcript, pp. 59-60 (Graves).

[8] Conference transcript, p. 17 (Bradley), and staff conversation with ***. *** also stated that shipping usually begins 3-6 months after an annual line review. ***.

[9] ***.

[10] ***.

[11] Conference transcript, p. 63 (Graves).

[12] Conference transcript, p. 62 (Bradley).

[13] For example, see ***.

[14] Conference transcript, pp. 135-136 (Brumm).

[15] Conference transcript, pp. 101-102 (Brumm).

[16] Conference transcript, p. 70 (Glenn).

secure other bundled business.[17] However, Target does not purchase ironing tables bundled with any other goods.[18] HPI denied that ironing table sales typically involve bundling with other goods, although it did say some sales involve a weighted-average of multiple ironing table products.[19]

Discounts and Price Lists

*** reported that discount policies are determined on a customer-by-customer basis. *** stated that it did not have a firm discount policy and that competition with price leader HPI drove pricing. *** reported some standard volume discounts, and *** reported discounts based on cost of doing business with a customer (e.g., freight, volume, prepaid, etc.). It elaborated that different channels of distribution receive different sales terms, with mass merchandisers and specialty stores buying off their f.o.b. price lists (customer pick-up) and grocery, hardware, and distributors buying off their so-called "prepaid" price lists. *** reported that it had no discounts.

*** reported that price lists are rarely used, and when used are usually discounted. Other parties described slightly different processes, with *** and *** reporting using price lists or discounts off price lists. *** also reported using price lists, but stated that negotiations will vary according to channel of distribution, with mass merchandisers typically receiving 12-month contracts, specialty stores receiving longer contracts, and grocery stores receiving discounts off of list price. *** reported considering ocean freight, and warehousing expenses.

Price History

In addition to Commission pricing data (below), parties at the conference offered conflicting descriptions of pricing before 2000. Petitioner stated that pricing was stable in the late 1990s and through 2001,[20] while respondents argued that HPI had been forcing U.S. prices lower since the late 1990s. Whitney Design stated that HPI began "aggressive price tactics" in 1998 and continued them through 2001, forcing the closure of Whitney Design's U.S. production facility. Whitney Design described retail prices for ironing tables as falling from about $17 in 1990, to about $15 in the late 90s, to about $13 now, and attributed the price falls to competition from HPI.[21] Specifically, Whitney stated that HPI had "attacked" its price points for T-legs at Ames and Bradleys (two now-defunct mass merchants) in the late 1990s and continuing into 2000.[22] According to petitioner, at the retail level, a T-leg ironing table will typically sell for $10-12, down from about $15 ten years ago.[23]

In response to questionnaire questions concerning price movements since January 2000, *** stated that while product design for ironing tables has remained similar, their market value has declined, and tables with special features (cord minders, iron holders, larger size, etc.) have become more reasonably priced. It added that higher quality mesh top ironing tables have become more prevalent.

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[17] Conference transcript, p. 84 (Kellogg) and postconference brief of Whitney, Polder, et al., pp. 10-11, 20-21 and att. 12.

[18] Conference transcript, p. 131 (McGrath).

[19] Conference transcript, pp. 63-64 (Graves). ***.

[20] Conference transcript pp. 10-11, 16, and 20-34 (Bradley and Graves).

[21] Conference transcript pp. 69-70 (Glenn). See also the extensive discussion of pricing competition between Whitney Design, HPI, Ironees, and Polder in ***.

[22] Conference transcript, pp. 74-75 (Brown). Bajer and Ironees also described aggressive pricing from HPI in the late 1990s and 2000s. Conference transcript, pp. 83-85 and 106 (Kellogg and Lehrman).

[23] Conference transcript, p. 46 (Graves).

While *** agreed that higher quality and more features were becoming more prevalent in the ironing table market, they described prices as trending up, and added that discount stores are not selling products priced between $30 and $90. *** stated that retail price points had dropped for ironing tables.

PRICE DATA

The Commission requested U.S. producers and importers of ironing tables to provide quarterly f.o.b. point of shipment data for the total quantity and value of ironing tables that were shipped to unrelated customers in the U.S. market. Data were requested for the period January 2000 to March 2003. The products for which pricing data were requested are as follows:

Product 1.–**Floor-standing, metal perforated-top ironing table, T-Leg, with pad and cover**

Product 2.–**Floor-standing, metal mesh-top ironing table, T-Leg, with pad and cover**

Two U.S. producers and six importers (***) provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[24] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' 2002 U.S. shipments of ironing tables and 71 percent of 2002 U.S. shipments of subject ironing tables imported from China.

Tables V-1 and V-2 and figures V-1 and V-2 present pricing data for products 1 and 2. Importers did not report any sales of product 1 (perforated-top ironing tables), but both parties did state that products 1 and 2 competed directly in many cases. Thus, table V-1 compares U.S. product 1 prices with imported product 2 prices, and table V-2 compares U.S. product 2 prices with imported product 2 prices.

Table V-1
Ironing tables: Weighted-average f.o.b. selling prices and quantities as reported by U.S. producers of product 1 and importers of product 2, and margins of underselling/(overselling), by quarters, January 2000-March 2003

* * * * * * *

Table V-2
Ironing tables: Weighted-average f.o.b. selling prices and quantities of product 2 as reported by U.S. producers and importers, and margins of underselling/(overselling), by quarters, January 2000-March 2003

* * * * * * *

Figure V-1
Ironing tables: Weighted-average f.o.b. selling prices as reported by U.S. producers and importers of products 1 and 2 from China, by quarters, January 2000-March 2003

* * * * * * *

[24] *** also submitted some pricing data, which were not used because its sales are all retail. *** submitted pricing data about which *** has raised objections (see petitioner's postconference brief, pp. A-11 and A-12). For these reasons, and because of the great disparity between different companies' prices, price data are presented by company as well as by country of origin.

Figure V-2
Ironing tables: Quantities as reported by U.S. producers and importers of products 1 and 2 from China, by quarters, January 2000-March 2003

* * * * * * *

However, the data in tables V-1 and V-2 mask the fact that pricing levels and trends by company can be quite different. Furthermore, aggregate producer data will mask the effect of Whitney Design moving its production from the United States to China. Thus, tables V-3 through V-5 and figures V-3 through V-8 present data by company and product. For example, Polder stated at the conference that it generally imports higher-end boards;[25] ***. *** were named in the lost sales and revenues as competing for many of the high volume, standard ironing table sales. Their pricing data show that they are *** in price.

Table V-3
Ironing tables: Weighted-average f.o.b. selling prices and quantities as reported by U.S. producers of product 1, by quarters and by producers, January 2000-March 2003

* * * * * * *

Table V-4
Ironing tables: Weighted-average f.o.b. selling prices and quantities as reported by U.S. producers of product 2, by quarters and by firms, January 2000-March 2003

* * * * * * *

Table V-5
Ironing tables: Weighted-average f.o.b. selling prices and quantities as reported by U.S. importers of product 2, by quarters and by firms, January 2000-March 2003

* * * * * * *

Figure V-3
Ironing tables: Weighted-average f.o.b. selling prices as reported by *, by quarters, January 2000-March 2003**

* * * * * * *

Figure V-4
Ironing tables: Quantities as reported by *, by quarters, January 2000-March 2003**

* * * * * * *

Figure V-5
Ironing tables: Weighted-average f.o.b. selling prices as reported by *, by quarters, January 2000-March 2003**

* * * * * * *

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[25] It described typical retail price points as $10-15 for a T-leg, $20-25 for a 4-leg, $30-50 for a mid-price (usually larger with more features), and $75-120 for an upper end table. Conference transcript, pp. 78-79 (Scott).

Figure V-6
Ironing tables: Quantities as reported by *, by quarters, January 2000-March 2003**

* * * * * * *

Figure V-7
Ironing tables: Weighted-average f.o.b. selling prices as reported by *, by quarters, January 2000-March 2003**

* * * * * * *

Figure V-8
Ironing tables: Quantities as reported by *, by quarters, January 2000-March 2003**

* * * * * * *

Price Trends and Comparisons

The pricing data for the overall market show mostly consistent overselling by U.S. producers (until mid-2002 for low U.S. volumes of product 2, and with tightening margins on product 1 in 2002 as well). However, there are several key caveats. First, petitioner has objected to some of the high-priced pricing data submitted by ***, given conference testimony about how ironing tables are sold to retailers for later re-sale at particular price points.[26] Second, when pricing data are compared on a company-by-company basis (tables V-3 to V-5 and figures V-3 to V-8), *** is not always the lowest price seller, and Chinese volumes are rising ***. Third, respondents have stated that "bundling" makes pricing more difficult to interpret. In the *Lost Sales and Lost Revenues* section below, there are examples of different types of subject ironing tables being judged together in one weighted-average price.[27]

Additionally, HPI has said that, due to implementation lags, lower import bids in the *** would not show up in actual shipments and pricing until second quarter 2003, and thus those lower reported bids will also not be reflected in the pricing data.[28]

However, pricing data do offer insights into several other claims made by parties. First, petitioner claimed that prices had been falling over January 2002-March 2003, but had been stable in 2000 and 2001 before Chinese imports began arriving in large quantities. In Commission pricing data, U.S. producer prices seem relatively stable over the entire January 2000-March 2003 period, but Chinese prices do show a drop down to U.S. price levels in 2002 and 2003 (and in the case of particular importers, sometimes below U.S. prices). Second, respondents argued that pricing had been falling more before the arrival of Chinese imports, but had been relatively stable since then. Commission pricing data do not address the issue of price competition before January 2000, but *** show an increase in prices over January 2000-December 2001. Third, Whitney Design had stated at the conference that it had basically replaced its U.S. production with Chinese production. As figure V-5 shows, Whitney's imported prices in 2002 and 2003 were *** than its U.S. production prices in 2000.

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[26] See staff conversation with *** and petitioner's postconference brief, pp. A-8 and A-9.

[27] For example, in ***.

[28] Another firm discussed in the *Lost Sales and Lost Revenues* section is ***, and therefore would not be reflected in the requested pricing data anyway. See, e.g., petitioner's postconference brief, p. A-9.

There is some seasonality in the pricing data, as referenced by parties at the conference. For example, Polder said that the commercial push of ironing tables in the back-to-school season was primarily T-legs marketed to college students.[29]

LOST SALES AND LOST REVENUES

The Commission requested that U.S. producers of metal-top ironing tables and certain parts thereof report any instances of lost sales and lost revenues they experienced due to competition from imports from China during January 2000-March 2003. There were *** lost revenue allegations totaling over $*** and involving over *** ironing tables. These allegations are presented in table V-6. Additionally, there were *** lost sales allegations totaling over $*** and involving over *** ironing tables; these allegations are shown in table V-7. Commission staff contacted many of the purchasers named in the allegations, and the results are summarized in the following text discussion.

Table V-6
U.S. producers' lost revenue allegations

* * * * * * *

Table V-7
U.S. producers' lost sales allegations

* * * * * * *

*** named *** in *** lost revenue *** involving *** ironing boards in ***. ***[30] ***[31] ***.[32]
*** was cited in *** lost revenue ***. *** involved an estimated *** units in ***. ***.[33]
*** was cited in *** lost sale ***. The lost sale *** involved *** in ***. ***.[34]
*** named *** in *** lost revenue *** involving *** in ***. ***.[35]
*** named *** in *** lost revenue *** involving *** in ***. ***.[36]
*** was cited in *** lost sale ***. ***.[37]

INTERNET REVERSE AUCTIONS

In addition to traditional lost sales and revenues information, the Commission also requested that parties (producers, importers, and purchasers) supply detailed information on any internet reverse auctions with which they had been involved. Over ***, there were at least *** internet reverse auctions for ironing tables, *** involving *** and *** involving ***. While reverse auctions are new in the

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[29] Conference transcript, p. 79 (Scott).

[30] See response to lost revenue fax.

[31] Staff conversation with ***. See also petitioner's postconference brief exh. 1, which shows ***.

[32] See petitioner's postconference brief exh. 3.

[33] Staff conversations with ***.

[34] Staff conversations with ***.

[35] Staff conversations with ***.

[36] ***.

[37] Staff conversations with ***.

ironing table industry, purchaser Target and some importers characterized the auctions as electronic versions of the previous annual line reviews, including a pre-qualification stage.

*** reverse auction was conducted by *** on ***. ***.[38] ***.[39] ***.[40] ***.[41] ***[42] ***.[43]

*** cited *** auction in *** lost sales *** involving ***.

*** held ***.[44] *** invited *** to participate in this auction. ***.[45] ***.[46] ***.

*** reverse auction held by *** on ***, was for the purchase of ***. *** invited *** to participate in the auction. ***.[47] ***.[48] ***.[49] ***.[50] ***.[51] ***.[52] ***.

*** cited *** reverse auction as a *** allegation, ***.[53]

*** held an auction to purchase ***. Suppliers were invited to bid on the purchase of ***.[54] ***.[55] ***.[56] ***. ***.[57] ***.[58] ***.[59] ***.[60] ***.

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[38] ***.

[39] ***.

[40] ***.

[41] ***.

[42] ***.

[43] ***.

[44] ***.

[45] ***.

[46] ***.

[47] ***.

[48] Staff conversation with ***.

[49] ***.

[50] ***.

[51] ***.

[52] Staff conversation with ***.

[53] ***.

[54] ***.

[55] ***.

[56] ***.

[57] ***.

[58] ***.

[59] ***.

[60] ***.

PART VI: FINANCIAL EXPERIENCE OF THE U.S. INDUSTRY

BACKGROUND

Two U.S. producers, HPI and Whitney Design, representing all known U.S. production during the period examined, provided usable financial data on their ironing table operations.[1] HPI currently produces ironing tables while Whitney Design ceased production in April 2002.[2]

OPERATIONS ON IRONING TABLES

Income-and-loss data for the U.S. producers on their ironing table operations are presented in table VI-1 and selected financial data, by firm, are presented in table VI-2.

Table VI-1
Results of operations of U.S. producers in the production of ironing tables, fiscal years 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

Table VI-2
Results of operations of U.S. producers of ironing tables, by firms, fiscal years 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

From 2000 to 2001 the quantity and value of net sales increased by *** and *** percent, respectively, then fell by *** and *** percent, respectively, from 2001 to 2002. Interim data reveal a further decline in net sales quantity and value of *** and *** percent, respectively, in the first three months of 2003 as compared to the first three months of 2002.

The average unit selling price likewise increased between 2000 and 2001 and then declined in both 2002 and between the interim periods. However, average unit cost of goods sold (COGS) declined continually throughout the period examined at a faster rate than average selling prices, resulting in increased unit gross profit throughout the period examined. Although selling, general, and administrative (SG&A) expenses generally increased on a per-unit basis during 2000-2002, it was not enough to offset the increased unit gross profit, resulting in operating margins that increased from *** percent in 2000

[1] HPI's fiscal year ends on the last Saturday in December. Whitney Design's fiscal year ends on December 31.

[2] In comparison to its most recent 10-K report for fiscal year 2002, HPI's reported sales of ironing tables represent approximately *** percent of net sales for its laundry management segment and *** percent of its total sales revenue during 2002. HPI's reported operating income from ironing tables represents *** percent of its total operating income during 2002 (Form 10-K for HPI, http://www.sec.gov/Archives/edgar).

to *** percent in 2001 and *** percent in 2002. However, the *** increase in unit SG&A expense between the interim periods more than offset the increase in unit gross profit and resulted in a lower operating income margin of *** percent in interim 2003 as compared to *** percent in interim 2002.[3] [4] [5]

HPI accounted for *** and *** percent of total quantity sold by U.S. producers in 2000 and 2001, respectively, before its share increased to *** percent in 2002 as Whitney Design ceased production. HPI's share of total quantity sold further increased to 100 percent during the first three months of 2003 (when Whitney Design had fully exited the market) as compared to *** percent in the same period of 2002.

INVESTMENT IN PRODUCTIVE FACILITIES, CAPITAL EXPENDITURES, AND RESEARCH AND DEVELOPMENT EXPENSES

The responding firms' data on capital expenditures, research and development (R&D) expenses, and the value of their property, plant, and equipment for their ironing table operations are shown in table VI-3. Capital expenditures, by firm, are presented in table VI-4.

Table VI-3
Capital expenditures, research and development expenses, and value of assets of U.S. producers of ironing tables, fiscal years 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

Table VI-4
Capital expenditures of U.S. producers of ironing tables, by firms, fiscal years 2000-2002, January-March 2002, and January-March 2003

* * * * * * *

CAPITAL AND INVESTMENT

The Commission requested U.S. producers to report whether there were any actual or potential negative effects of imports of ironing tables from China on their firms' growth, investment, and ability to raise capital or development and production efforts (including efforts to develop a derivative or more advanced version of the product). Their responses are shown below.

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[3] The increase in unit SG&A expenses in interim 2003 as compared to interim 2002 may reflect the fact that certain fixed costs were allocated over reduced sales volumes.

[4] HPI submitted additional financial data for the second quarter of 2003 in its postconference brief at exh. 2 showing that its operating income margin was *** percent in April-June 2003 and *** percent in January-June 2003.

[5] On July 30, 2003, Standard & Poor's announced the downgrade of HPI's corporate credit rating from B+ to B, as well as the downgrade of its senior secured debt rating from BB- to B+ and the downgrade of its subordinated debt rating from B- to CCC+. According to the Standard & Poor's publication, the downgrade "reflects increased competitive pressures that have eroded profitability, including intense price competition at the retail level from imported products and sharply higher raw material costs." (Standard & Poor's article submitted in e-mail from Frederick Ikenson, counsel for HPI, July 31, 2003.) *Note that this downgrade reflects Standard & Poor's analysis of HPI's overall operations, not just ironing table operations.*

Actual Negative Effects:

HPI: ***.

Whitney Design: ***.

Anticipated Negative Effects:

HPI: ***.

Whitney Design: ***.

PART VII: THREAT CONSIDERATIONS

The Commission analyzes a number of factors in making threat determinations (see 19 U.S.C. § 1677(7)(F)(I)). Information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows.

THE INDUSTRY IN CHINA

There were 16 Chinese firms named in the petition as being producers and/or exporters of Chinese ironing tables, five of which provided the Commission with usable data.[1] They are as follows: Since Hardware (Guangzhou) Co.; Foshan City Gaoming Lihe Daily Necessities Co., Ltd.; Harvest International Housewares Ltd.;[2] Shunde Yongjian Houseware Co., Ltd. (Wire King); and Lerado (Zhongshan) Industrial Co., Ltd. The data of these five firms are presented in table VII-1. Except for timing differences, exports to the United States reported by these firms closely approximate reported imports during most of the period examined.[3]

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[1] Two firms named in the petition, Eagle Metal Furniture Co., Ltd., and Shen Tehan Industrial Co., Ltd., provided questionnaire responses stating that they had not produced or exported ironing tables or parts thereof in the period examined. One firm--Shunde (Wire King) was named twice in the petition. Firms named in the petition which have not responded to the Commission's questionnaire are: Forever Holdings Ltd.; Fuyali Houseware Co., Ltd.; Guandong Ironing Board Factory; Hongfong Hardware Manufactory Co., Ltd.; Jiangmen Silk Import & Export Corp. of Guangdong; Taifuex Industries Corp.; Test Rite International Co., Ltd.; Ching Feng Home Fashion Co. Ltd.; and New Tech Integrated. Test Rite International is a Chinese exporter instead of a Chinese producer. See, staff conversation with *** of Test Rite Products Corp. (Test Rite), August 6, 2003. ***.

[2] This firm was not named in the petition.

[3] During January-March 2003, reported imports exceed reported exports, after adjusting for timing differences, by about *** units.

Table VII-1
Ironing tables: Reported production capacity, production, shipments, and inventories for five producers in China, 2000-2002, January-March 2002, January-March 2003, and projected 2003-2004

	2000	2001	2002	January-March 2002	January-March 2003	2003	2004
				Quantity (1,000 *units*)			
Capacity	840	1,540	3,210	818	873	3,750	5,650
Production	809	1,441	3,097	591	704	3,635	5,508
End of period inventories	***	***	***	***	***	***	***
Shipments: Internal consumption	0	0	0	0	0	0	0
Home market	***	***	***	***	***	***	***
Exports to-- The United States	***	***	1,594	***	398	1,955	2,473
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	789	1,447	3,085	611	703	3,577	5,512
				Ratios and shares (*percent*)			
Capacity utilization	96.3	93.5	96.5	72.3	80.7	96.9	97.5
Inventories to production	***	***	***	***	***	***	***
Inventories to total shipments	***	***	***	***	***	***	***
Share of total quantity of shipments: Internal consumption	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Home market	***	***	***	***	***	***	***
Exports to-- The United States	***	***	51.7	***	56.5	54.6	44.9
All other markets	***	***	***	***	***	***	***
All export markets	***	***	***	***	***	***	***

Note.–Because of rounding, figures may not add to the totals shown. Inventory ratios for the January-March periods are annualized.

Source: Compiled from data submitted in response to Commission questionnaires.

*** of the five foreign producers reported greater projected capacity to produce ironing tables in 2003 and/or 2004 than they reported in 2002, as shown in the following tabulation (in thousands of units):

Firm	Actual experience					Projections	
				January-March			
	2000	2001	2002	2002	2003	2003	2004
Foshan City	***	***	***	***	***	***	***
Harvest International	***	***	***	***	***	***	***
Lerado (Zhongshan)	***	***	***	***	***	***	***
Since Hardware	***	***	***	***	***	***	***
Shunde (Wire King)	***	***	***	***	***	***	***
Total	840	1,540	3,210	818	873	3,750	5,650

At the conference, Since Hardware, which said that it was the largest Chinese producer of ironing tables and exporter of such products to the United States,[4] stated that its reported increase in capacity is designed for markets such as the EU, Canada, Japan, and South America, rather than the United States.

Since Hardware reported that its sales of ironing tables accounted for *** percent of its firm's total sales in its most recent fiscal year; Foshan City reported *** percent, Harvest International reported *** percent, Lerado reported *** percent, and Shunde reported *** percent. *** Chinese producers reported producing other products on the same machinery and equipment used to produce subject ironing tables. These other products included nonsubject ironing boards, metal furniture (***), children's items (***) and ***.

U.S. INVENTORIES OF IRONING TABLES FROM CHINA

U.S. importers' inventories of subject ironing tables are reported in table VII-2.[5] End-of-period inventories of imports of Chinese ironing tables increased continually over the period examined and were as of the end of March 2003 over 10 times the level of yearend 2000.

[4] Conference transcript, p. 104 (Morgan). According to its foreign producer questionnaire response, Since Hardware ***. According to questionnaire responses from those Chinese producers that responded to the Commission's questionnaire, Since Hardware accounted for ***.

[5] *** stated that inventories, imports, and shipments do not reconcile. Reasons given were damages, substitution, shortages, and inventory adjustment.

Table VII-2
Ironing tables: U.S. importers' end-of-period inventories of imports from China and from all other sources, 2000-2002, January-March 2002, and January-March 2003

Source	Calendar year			January-March	
	2000	2001	2002	2002	2003
	End-of-period inventories *(1,000 units)*				
China	43	160	***	174	518
All other sources	***	***	***	***	***
Total	***	***	***	***	***
	Ratio to imports *(percent)*				
China	20.9	22.0	***	27.7	24.8
All other sources	***	***	***	***	***
Average	***	***	***	***	***
	Ratio to U.S. shipments of imports *(percent)*				
China	23.3	26.3	***	31.4	34.0
All other sources	***	***	***	***	***
Average	***	***	***	***	***

Note.--Ratios are calculated by using data of firms that provided both inventory data and import/shipment data. Partial-year ratios are based on annualized import and shipment data.

Source: Compiled from data submitted in response to Commission questionnaires.

DUMPING IN THIRD-COUNTRY MARKETS

There is no indication that ironing tables from China have been subject to any other import relief investigations in the United States or in any other countries.

IMPORTS FOR DELIVERY AFTER MARCH 31, 2003

Six importers[6] stated that they had imported or arranged for the importation of ironing tables from China with delivery after March 31, 2003: (1) *** reported *** units during April-September 2003,[7] (2) *** reported *** units during April-September 2003, (3) *** provided documentation detailing *** units during April-July 2003, (4) *** stated it imported ironing tables from China on a weekly basis but was not more specific, (5) *** stated it had such imports/arrangements to import but provided no specifics, and (6) *** stated that it "tries to maintain a relatively consistent inventory of ironing tables . . . {and therefore it} maintains open purchase orders that are filled by its supplier as current inventory is sold;" *** identified a total of *** units in a variety of styles that are associated with the purchase orders that are currently open, but stated that there are no specific delivery dates associated with these orders.

[6] One other firm, ***, checked "yes" but it also stated in its questionnaire response that "***;" in light of the conflicting evidence, staff has disregarded its response.

[7] *** further stated that additional imports in September 2003 and subsequent thereto, while expected to occur, have not yet been arranged and estimated that the total quantity of its imports of Chinese ironing tables during April-December 2003 will be *** units.

APPENDIX A

FEDERAL REGISTER NOTICES

INTERNATIONAL TRADE COMMISSION

[Investigation No. 731–TA–1047 (Preliminary)]

Ironing Tables and Certain Parts Thereof From China

AGENCY: International Trade Commission.

ACTION: Institution of antidumping investigation and scheduling of a preliminary phase investigation.

SUMMARY: The Commission hereby gives notice of the institution of an investigation and commencement of preliminary phase antidumping investigation No. 731–TA–1047 (Preliminary) under section 733(a) of the Tariff Act of 1930 (19 U.S.C. 1673b(a)) (the Act) to determine whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury, or the establishment of an industry in the United States is materially retarded, by reason of imports from ironing tables and certain parts thereof, provided for in subheadings 9403.20.00 and 9403.90.80 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value. Unless the Department of Commerce extends the time for initiation pursuant to section 732(c)(1)(B) of the Act (19 U.S.C. 1673a(c)(1)(B)), the Commission must reach a preliminary determination in antidumping investigations in 45 days, or in this case by August 14, 2003. The Commission's views are due at Commerce within five business days thereafter, or by August 21, 2003.

For further information concerning the conduct of this investigation and rules of general application, consult the Commission's Rules of Practice and Procedure, part 201, subparts A through E (19 CFR part 201), and part 207, subparts A and B (19 CFR part 207).

EFFECTIVE DATE: June 30, 2003.

FOR FURTHER INFORMATION CONTACT: Gail Burns (202–205–2501), Office of Investigations, U.S. International Trade Commission, 500 E Street SW., Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission's TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202–205–2000. General information concerning the Commission may also be obtained by accessing its Internet server *(http://www.usitc.gov)*. The public record for this investigation may be viewed on the Commission's electronic docket (EDIS) at *http://edis.usitc.gov*.

SUPPLEMENTARY INFORMATION:

Background.—This investigation is being instituted in response to a petition filed on June 30, 2003, by Home Products International, Inc., Chicago, IL.

Participation in the investigation and public service list.—Persons (other than petitioners) wishing to participate in the investigation as parties must file an entry of appearance with the Secretary to the Commission, as provided in sections 201.11 and 207.10 of the Commission's rules, not later than seven days after publication of this notice in the **Federal Register**. Industrial users and (if the merchandise under investigation is sold at the retail level) representative consumer organizations have the right to appear as parties in Commission antidumping investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to this investigation upon the expiration of the period for filing entries of appearance.

Limited disclosure of business proprietary information (BPI) under an administrative protective order (APO) and BPI service list.—Pursuant to section 207.7(a) of the Commission's rules, the Secretary will make BPI gathered in this investigation available to authorized applicants representing interested parties (as defined in 19 U.S.C. 1677(9)) who are parties to the investigation under the APO issued in the investigation, provided that the application is made not later than seven days after the publication of this notice in the **Federal Register**. A separate service list will be maintained by the Secretary for those parties authorized to receive BPI under the APO.

Conference.—The Commission's Director of Operations has scheduled a conference in connection with this investigation for 9:30 a.m. on July 21, 2003, at the U.S. International Trade Commission Building, 500 E Street SW., Washington, DC. Parties wishing to participate in the conference should contact Gail Burns (202–205–2501) not later than July 17, 2003, to arrange for their appearance. Parties in support of the imposition of antidumping duties in this investigation and parties in opposition to the imposition of such duties will each be collectively allocated one hour within which to make an oral presentation at the conference. A nonparty who has testimony that may aid the Commission's deliberations may request permission to present a short statement at the conference.

Written submissions.—As provided in sections 201.8 and 207.15 of the Commission's rules, any person may submit to the Commission on or before July 24, 2003, a written brief containing information and arguments pertinent to the subject matter of the investigation. Parties may file written testimony in connection with their presentation at the conference no later than three days before the conference. If briefs or written testimony contain BPI, they must conform with the requirements of sections 201.6, 207.3, and 207.7 of the Commission's rules. The Commission's rules do not authorize filing of submissions with the Secretary by facsimile or electronic means, except to the extent permitted by section 201.8 of the Commission's rules, as amended, 67 FR 68036 (November 8, 2002).

In accordance with sections 201.16(c) and 207.3 of the rules, each document filed by a party to the investigation must be served on all other parties to the investigation (as identified by either the public or BPI service list), and a certificate of service must be timely filed. The Secretary will not accept a document for filing without a certificate of service.

Authority: This investigation is being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to section 207.12 of the Commission's rules.

Issued: July 1, 2003.

By order of the Commission.

Marilyn R. Abbott,

Secretary to the Commission.

[FR Doc. 03–17193 Filed 7–7–03; 8:45 am]

BILLING CODE 7020–02–P

DEPARTMENT OF COMMERCE

International Trade Administration

[A-570–888]

Notice of Initiation of Antidumping Investigation: Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof from the People's Republic of China

AGENCY: Import Administration, International Trade Administration, Department of Commerce.

ACTION: Initiation of Antidumping Investigation

EFFECTIVE DATE: July 25, 2003.

FOR FURTHER INFORMATION CONTACT: Paige Rivas or Sam Zengotitabengoa, AD/CVD Enforcement Office IV, Import Administration, International Trade Administration, U.S. Department of Commerce, 14th Street and Constitution Avenue, NW, Washington, D.C. 20230; telephone: (202) 482–0651 or (202) 482–4195, respectively.

INITIATION OF INVESTIGATION:

The Petition

On June 30, 2003, the Department of Commerce (the Department) received a *Petition for the Imposition of Antidumping Duties on Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof from the People's Republic of China* (*the petition*), filed in proper form, by Home Products International, Inc. (the petitioner). The Department received information supplementing the petition on July 2, 2003, and July 8, 2003.

In accordance with section 732(b) of the Tariff Act of 1930 (the Act), as amended by the Uruguay Round Agreements Act, the petitioner alleges that imports of floor-standing, metal-top ironing tables and certain parts thereof (ironing tables) from the People's Republic of China (PRC) are being, or are likely to be, sold in the United States at less than fair value (LTFV) within the meaning of section 731 of the Act, and that such imports are materially injuring, or are threatening to materially injure, an industry in the United States.

The Department finds that the petitioner filed this petition on behalf of the domestic industry because it is an interested party as defined in section 771(9)(C) of the Act and has demonstrated sufficient industry support with respect to the antidumping investigation that it is requesting the Department to initiate. *See Determination of Industry Support for the Petition* section below.

Period of Investigation

The anticipated period of investigation (POI) for this investigation is October 1, 2002, through March 31, 2003.

Scope of Investigation

For purposes of this investigation, the product covered consists of floor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with various features, including iron rests, linen racks, and others. The subject ironing tables may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this investigation.

Furthermore, this investigation specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. For purposes of this investigation, the term "unassembled" ironing table means product requiring the attachment of the leg assembly to the top or the attachment of an included feature such as an iron rest or linen rack. The term "complete" ironing table means product sold as a ready-to-use ensemble consisting of the metal-top table and a pad and cover, with or without additional features, *e.g.* iron rest or linen rack. The term "incomplete" ironing table means product shipped or sold as a "bare board" *i.e.*, a metal-top table only, without the pad and cover- with or without additional features, *e.g.* iron rest or linen rack. The major parts or components of ironing tables that are intended to be covered by this investigation under the term "certain parts thereof" consist of the metal top component (with or without assembled supports and slides) and/or the leg components, whether or not attached together as a leg assembly. The investigation covers separately shipped metal top components and leg components, without regard to whether the respective quantities would yield an exact quantity of assembled ironing tables.

Ironing tables without legs (such as models that mount on walls or over doors) are not floor-standing and are specifically excluded. Additionally, tabletop or countertop models with short legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded.

The subject ironing tables were previously classified under Harmonized Tariff Schedule of the United States (HTSUS) subheading 9403.20.0010. Effective July 1, 2003, the subject ironing tables are classified under new HTSUS subheading 9403.20.0011. The subject metal top and leg components are classified under HTSUS subheading 9403.90.8040. Although the HTSUS subheadings are provided for convenience and for the purposes of U.S. Bureau of Customs and Border Protection (Customs), the Department's written description of the scope remains dispositive.

During our review of the petition, we discussed the scope with the petitioner and the commodity specialist at the United States Bureau of Customs and Border Protection to ensure that it accurately reflects the product for which the domestic industry is seeking relief. Moreover, as discussed in the preamble to the Department's regulations (62 FR 27296, 27323), we are setting aside a period for parties to raise issues regarding product coverage. The Department encourages all parties to submit such comments within 20 days of publication of this notice. Comments should be addressed to Import Administration's Central Records Unit (CRU), at Room 1870, U.S. Department of Commerce, 14th Street and Constitution Avenue, NW, Washington, D.C. 20230. The period of scope consultations is intended to provide the Department with ample opportunity to consider all comments and consult with parties prior to the issuance of our preliminary determination.

Determination of Industry Support for the Petition

Section 732(b)(1) of the Act requires that a petition be filed on behalf of the domestic industry. Section 732(c)(4)(A) of the Act provides that a petition meets this requirement if the domestic producers or workers who support the petition account for: (1) at least 25 percent of the total production of the domestic like product; and, (2) more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the petition. Finally, section 732(c)(4)(D) of the Act provides that, if the petition does not establish support of domestic producers or workers accounting for more than 50 percent of the total production of the domestic like product, the administering agency shall: (i) poll the industry or rely on other information in order to determine if there is support for the petition as required by subparagraph (A), or (ii) determine industry support using any statistically valid sampling method to poll the industry.

Section 771(4)(A) of the Act defines the "industry" as the producers of a domestic like product. Thus, to determine whether the petition has the requisite industry support, the Act directs the Department to look to producers and workers who account for production of the domestic like product. *See* sections 771(4)(A)(i) and (ii) of the Act. The International Trade Commission (ITC), which is responsible for determining whether "the domestic industry" has been injured, must also determine what constitutes a domestic like product in order to define the industry. *See* section 771(10) of the Act. While both the Department and the ITC must apply the same statutory definition regarding the domestic like product (section 771(10) of the Act), they do so for different purposes and pursuant to separate and distinct authority. In addition, the Department's determination is subject to limitations of time and information. Although this may result in different definitions of the domestic like product, such differences do not render the decision of either agency contrary to the law.[1]

Section 771(10) of the Act defines the domestic like product as "a product that is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this title." Thus, the reference point from which the domestic like product analysis begins is "the article subject to an investigation," *i.e.*, the class or kind of merchandise to be investigated, which normally will be the scope as defined in the petition. Moreover, the petitioner does not offer a definition of domestic like product distinct from the scope of the investigation.

Based on our analysis of the information presented by the petitioner, we have determined that there is a single domestic like product, which is defined in the "Scope of Investigation" section of the notice. The Department has no basis on the record to find this definition of the domestic like product to be inaccurate. The Department, therefore, has adopted this domestic like product definition. *See Import Administration Antidumping Investigation Checklist*, dated July 18, 2003, (*Initiation Checklist*), at page 2 (public version on file in the CRU of the Department, Room B-099).

The Department has further determined that this petition contains adequate evidence of industry support. As HPI is the only producer of floor-standing metal-top ironing tables in the United States, there is no production data for any other domestic producers of floor-standing metal-top ironing tables. The petitioner provided actual production volume for January through December 2002. We conducted a search of the information reasonably available on the Internet and could find no information that contradicted the petitioner's assertion. Information contained in the petition demonstrates that the domestic producer or workers who support the petition account for over 50 percent of total production of the domestic like product. Therefore, the domestic producers or workers who support the petition account for at least 25 percent of the total production of the domestic like product, and the requirements of section 732(c)(4)(A)(i) of the Act are met. *See Initiation Checklist*, at pages 3 and 4. Furthermore, because the Department received no opposition to the petition, the domestic producers or workers who support the petition account for more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for or opposition to the petition. *See Initiation Checklist*, at pages 3 and 4. Thus, the requirements of section 732(c)(4)(A)(ii) of the Act are also met.

Accordingly, the Department determines that this petition was filed on behalf of the domestic industry within the meaning of section 732(b)(1) of the Act. *See Id.*

Export Price and Normal Value

The following are descriptions of the allegations of sales at LTFV upon which our decision to initiate this investigation is based. Based on the information submitted in the petition, adjusted where appropriate, we are initiating this investigation, as discussed below and in the *Initiation Checklist*.

The Department has analyzed the information in the petition and considers the country-wide import statistics for the anticipated POI and market information used to calculate the

[1] *See Algoma Steel Corp. Ltd., v. United States*, 688 F. Supp. 639, 642-44 (CIT 1988); *High Information Content Flat Panel Displays and Display Glass Therefore from Japan: Final Determination; Rescission of Investigation and Partial Dismissal of Petition*, 56 FR 32376, 32380-81 (July 16, 1991).

estimated margin for the subject country to be sufficient for purposes of initiation. *See Initiation Checklist*, at page 3. Should the need arise to use any of this information in our preliminary or final determination for purposes of facts available under section 776 of the Act, we may re-examine the information and revise the margin calculation, if appropriate.

Export Price

To calculate export price (EP), the petitioner provided: (1) a direct price quotation of a mesh-top T-leg unit, with pad and cover, from a major Chinese producer and exporter of ironing tables to the United States; and, (2) a bid offer from an unknown competing vendor. The price quotation provided by the petitioner for the subject merchandise was determined to be sufficient for initiation purposes. Since the petitioner was unable to document who the supplier was, we did not consider the bid offer as a basis for EP. Should the need arise to use any of this information as facts available under section 776 of Tariff Act of 1930 (the Act) in our preliminary or final determinations, we may reexamine the information and revise the margin calculations, if appropriate. *See Petition*, at page 17.

The ironing table model referenced in the price quotation represents the single dominant design that pervades the U.S. market. *See Initiation Checklist*, at page 6. Given the terms of sale applicable to the price quotation, the petitioner made no adjustments to EP because the reliance upon the sale price offered by the seller reflects a conservative approach.

Normal Value

The petitioner asserted that the PRC is an NME country and no determination to the contrary has yet been made by the Department. In previous investigations, the Department determined that the PRC is an NME. *See, e.g., Final Determination on Ferrovanadium from the People's Republic of China*, 67 FR 71137 (November 29, 2002); *Final Determination on Cold-Rolled Carbon Steel Flat Products from the People's Republic of China*, 67 FR 62107 (October 3, 2002). In accordance with section 771(18)(C)(i) of the Act, the presumption of NME status remains in effect until revoked by the Department. The presumption of NME status for the PRC has not been revoked by the Department and, therefore, remains in effect for purposes of the initiation of this investigation. Because the PRC's status as an NME remains in effect, the petitioner determined the dumping margin using a factors of production (FOP) analysis.

For the normal value (NV) calculation, the petitioner based the FOP analysis, with respect to raw materials, labor, and energy, as defined by section 772(c)(3) of the Act, on its knowledge and experience of the ironing board industry and ironing board production process, and, where applicable, on a physical examination of a Chinese mesh-top T-leg ironing table. The petitioner also added to the FOP values an amount for factory overhead, selling, general, and administrative expenses, and profit, as well as an amount for packing.

Pursuant to section 773(c) of the Act, the petitioner asserted that India is the most appropriate surrogate country for the PRC, claiming that India is: (1) at a level of development comparable to the PRC in terms of per capita gross national income (GNI), which is the current World Bank term for what was previously termed "Gross National Product" (GNP); and, (2) a significant producer of comparable merchandise. The petitioner further notes that India has often been the primary surrogate country for PRC cases. *See, e.g., Notice of Preliminary Determination of Sales at Less Than Fair Value: Saccharin From the People's Republic of China*, 67 FR 79049, 79054 (December 27, 2002). Furthermore, the petitioner has been able to obtain all of the necessary data to value the factors of ironing table production in India. Based on the information provided by the petitioner, we believe that the petitioner's use of India as a surrogate country is appropriate for purposes of initiating this investigation. *See Initiation Checklist*, at page 7.

The petitioner identified and quantified the material inputs (*e.g.*, cold-rolled flat-rolled steel, washers, cloth, etc.) based on its knowledge and experience, as well as its physical examination of a Chinese mesh-top T-leg ironing table. The petitioner valued these material inputs based on Indian import statistics for the period of July 2002 through December 2002, as published by the *World Trade Atlas* subscription service, which, in turn, obtains data from the Indian Ministry of Commerce and Industry, Director General, Commercial Intelligence & Statistics. Because some of these values are from a period preceding the POI, the petitioner adjusted for inflation the values to reflect the POI levels, where appropriate, using the Indian Wholesale Price Index (WPI) (compiled by the Indian ministry of Commerce and Industry, Office of the Economic Advisor). *See Initiation Checklist*, at page 6.

Based on its knowledge of Chinese ironing-table producing equipment, the petitioner was able to quantify the amount of electricity consumed. The petitioner valued electricity based on the Indian publication *Electricity for Industry*, for the fourth quarter 2001, as maintained by the International Energy Agency on its website (http://www.iea.org/statist/keyworld2002/key2002/ p_0505.htm). That value was then adjusted for inflation on the basis of the Indian monthly WPI for Electricity for Industry. *See Initiation Checklist*, at page 7.

To determine the quantity of natural gas used in the heat curing finishing process, the petitioner relied on its own knowledge and experience. To value natural gas, the petitioner used a value derived from the Indian company Gail (India) Ltd., for May through September 2002. *See Initiation Checklist*, at page 7.

The petitioner valued labor by applying the Department's regression-based wage rate for the PRC, in accordance with section 351.408(c)(3) of the Department's regulations, to the corresponding yield rates for each process.

For manufacturing overhead, selling, general, and administrative expenses, and profit, the petitioner relied upon the publicly available financial data of Godrej & Boyce Manufacturing Company Ltd. (Godrej). The Department recently relied upon this data in another antidumping investigation. *See Notice of Final Determination of Sales at Less Than Fair Value: Folding Metal Tables and Chairs from the People's Republic of China*, 67 FR 20090 (April 24, 2002). Godrej is an Indian producer of metal furniture, including folding metal tables that is sufficiently similar to metal-top ironing tables in terms of materials and production processes to be considered comparable merchandise. *See Initiation Checklist*, at page 8.

Based on the information provided by the petitioner, we believe that the surrogate values represent information reasonably available to the petitioner and are acceptable for purposes of initiating this investigation. See Initiation Checklist, at page 8.

Fair Value Comparisons

Based on the data provided by the petitioner, there is reason to believe that imports of ironing tables from the PRC are being, or are likely to be, sold at LTFV.

Based on a comparison of EP to NV, the petitioner calculated an estimated dumping margin of **59.32** percent. A summary of the margin calculation is

contained in the *Initiation Checklist* at Attachment III.

Allegations and Evidence of Material Injury and Causation

The petitioner alleges that the U.S. industry producing the domestic like product is being materially injured, and is threatened with material injury, by reason of the imports of the subject merchandise sold at less than NV. The allegations of injury and causation are supported by relevant evidence including the petitioner's import data, lost sales data, and pricing information. The Department assessed the allegations and supporting evidence regarding material injury and causation and determined that these allegations are supported by accurate and adequate evidence and meet the statutory requirements for initiation. *See Initiation Checklist*, at page 4 and Attachment II.

Initiation of Antidumping Investigation

Based on our examination of the petition, we have found that the petition meets the requirements of section 732 of the Act. Therefore, we are initiating an antidumping investigation to determine whether imports of ironing tables from the PRC are being, or are likely to be, sold in the United States at LTFV. Should the need arise to use any of this information as facts available under section 776 of the Act in our preliminary or final determinations, we may reexamine the information and revise the margin calculations, if appropriate. Unless this deadline is extended, we will make our preliminary determination no later than 140 days after the date of this initiation.

Distribution of Copies of the Petition

In accordance with section 732(b)(3)(A) of the Act, copies of the public version of the petition have been provided to representatives of the government of the PRC.

International Trade Commission Notification

We have notified the ITC of our initiation, as required by section 732(d) of the Act.

Preliminary Determination by the ITC

The ITC will determine by August 14, 2003, whether there is a reasonable indication that an industry in the United States is materially injured, or is threatened with material injury, by reason of imports of ironing tables from the PRC. A negative ITC determination will result in the investigation being terminated; otherwise, this investigation will proceed according to statutory and regulatory time limits.

This notice is issued and published in accordance with section 777(i) of the Act.

Dated: July 21, 2003.

Joseph A. Spetrini,

Acting Assistant Secretary

[FR Doc. 03–19025 Filed 7–24–03; 8:45 am]

BILLING CODE 3510–DS–S

APPENDIX B

CONFERENCE WITNESSES

CALENDAR OF THE PUBLIC CONFERENCE

Those listed below appeared as witnesses at the United States International Trade Commission's conference held in connection with the following investigation:

IRONING TABLES AND CERTAIN PARTS THEREOF FROM CHINA

Investigation No. 731-TA-1047 (Preliminary)

July 21, 2003 - 9:30 am

The conference was held in Room 101 (Main Hearing Room) of the United States International Trade Commission Building, 500 E Street, SW, Washington, DC.

IN SUPPORT OF THE IMPOSITION OF ANTIDUMPING DUTIES:

Blank Rome LLP
Washington, DC
on behalf of

Home Products International, Inc.

Peter Graves, Senior Vice President, Sales and Marketing, Home Products International, Inc.
Charles F. Avery, Jr., Senior Vice President of Finance, Home Products International, Inc.
Dr. Michael D. Bradley, Department of Economics, The George Washington University

Frederick L. Ikenson–OF COUNSEL
Roberta Kienast Daghir

IN OPPOSITION TO THE IMPOSITION OF ANTIDUMPING DUTIES:

Garvey Schubert Barer
Washington, DC
on behalf of

Polder, Inc.
Whitney Design, Inc.

Calvin Scott, President, Polder, Inc.
James Glenn, President, Whitney Design, Inc.
Mark Brown, Chief Financial Officer, Whitney Design, Inc
Mike Kellogg, President, Bajer Design and Marketing
Richard Boltuck, Charles River Associates, Inc.-- ECONOMIC CONSULTANT

William E. Perry–OF COUNSEL
Ronald M. Wisla

White & Case
Washington, DC
on behalf of

Since Hardware (Guangzhou) Co., Ltd.

Keir Whitson–OF COUNSEL
Frank Morgan

Barnes, Richardson & Colburn
Chicago, IL
on behalf of

Target Corporation

Lisa Brumm, Buyer, Target Corporation
Toni Dembski-Brandl, Esq., Senior Counsel, Target Corporation

Matthew McGrath–OF COUNSEL
David G. Forgue

The Ironees Company

David Lehrman–President

APPENDIX C

SUMMARY DATA

Table C-1
Ironing tables: Summary data concerning the U.S. market, 2000-2002, January-March 2002, and January-March 2003

(Quantity=1,000 units, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per unit; period changes=percent, except where noted)

Item	Reported data					Period changes			
				January-March					Jan.-Mar.
	2000	2001	2002	2002	2003	2000-2002	2000-2001	2001-2002	2002-2003
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China	***	***	***	***	***	***	***	***	***
Other sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China	***	***	***	***	***	***	***	***	***
Other sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. shipments of imports from:									
China:									
Quantity	185	607	1,315	139	381	609.2	227.4	116.6	174.9
Value	2,930	7,874	12,174	1,852	3,733	315.5	168.8	54.6	101.6
Unit value	$15.80	$12.97	$9.26	$13.36	$9.80	-41.4	-17.9	-28.6	-26.7
Ending inventory quantity	43	160	***	174	518	***	268.6	***	197.5
All other sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
U.S. producers':									
Average capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***
Capacity utilization (1)	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Inventories/total shipments (1)	***	***	***	***	***	***	***	***	***
Production workers	***	***	***	***	***	***	***	***	***
Hours worked (1,000s)	***	***	***	***	***	***	***	***	***
Wages paid ($1,000s)	***	***	***	***	***	***	***	***	***
Hourly wages	***	***	***	***	***	***	***	***	***
Productivity (units per hour)	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***
COGS/sales (1)	***	***	***	***	***	***	***	***	***
Operating income or (loss)/ sales (1)	***	***	***	***	***	***	***	***	***

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires.

Table C-2
Over-the-door/wall-mounted and table-top ironing tables: Summary data concerning the U.S. market, 2000-2002, January-March 2002, and January-March 2003

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Table C-3
Floor-standing, over-the-door/wall-mounted, and table-top tables: Summary data concerning the U.S. market, 2000-2002, January-March 2002, and January-March 2003

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APPENDIX D

SUMMARY OF RESPONSES TO DOMESTIC LIKE PRODUCT QUESTIONS

Comparisons Between "Ironing Tables" (Floor-Standing, Metal-Topped Products) and "Excluded Ironing Boards" (Also Metal-Topped but Over-the-Door, Wall-Mounted, Countertop, or Tabletop Products)

Firms were asked to describe any similarities and/or differences in the physical characteristics of the products. Their responses are as follows:

***: "In many ways, the excluded ironing boards are identical to the ironing tables as defined in this questionnaire. Each has a large, flat ironing surface that can be covered with a pad and used for hand pressing clothing. Often these ironing surfaces are identical in shape, size and construction. Obviously, over-door boards have hanging hardware in place of folding legs, and wall-mounted ironing boards typically come with hardware that allows for permanent installation in or on a wall. Tabletop and countertop boards differ from "ironing tables" primarily in that they typically have much shorter, fixed legs designed to be set upon a table or counter."

***: N/A

***: "The floor-standing, metal-top ironing tables consist of full-height leg assemblies that support an ironing surface at an appropriate (often adjustable) height above the floor. The typical surface dimensions of such tables range from 48 to 54 inches in length and from 13 to 18 inches in width. They are produced in a variety of leg finishes, such as painted, plated, or matte, and are often available with various features, such as iron rests and linen racks. When the ironing table is not in use, the legs are typically folded up under the tabletop and the unit is stored in a convenient place.

Metal over-door ironing boards consist of a metal ironing surface that is attached to a door. The table surface dimensions typically are 42 inches in length and 15 inches in width. When in use, the board is opened perpendicular to and supported by the door; when not in use, it is folded up against the door for storage. (Wall-mounted ironing boards - a super-niche product - typically are enclosed in a cabinet installed permanently against a wall. When used, the board drops down in a manner similar to the over-door board. The surface dimensions are similar to those of the over-door board.)"

***: "Our tables are standard 54" x 15", whereas ***'s products are approximately 53" x 13". Our standard tables have a mesh top, whereas their table is perforated."

***: "Floor models tend to be larger while excluded models tend to be smaller, more space saving, or portable."

***: "Both are used for ironing. Ironing tables stand directly on the floor, while excluded products do not. In addition, it is *** experience that it is unusual for ironing boards to have mesh tops, which all of the ironing tables *** sells typically have mesh tops. Instead, ironing boards tend to have fiberboard tops. This is a very important differentiating factor, since the amount of steam that can penetrate the pressed article is crucial to its pressing, and mesh allows more steam."

***: "Over the door unit requires the use of a door. Countertop ironing is done by sitting on the floor or using a table versus standing."

Firms were asked to describe any similarities and/or differences in the uses of the products. Their responses are as follows:

***: "The subject ironing tables and the excluded boards are all used for the hand ironing or pressing of garments or other articles of fabric (although ironing of large articles such as sheets is difficult to perform on the excluded boards). The excluded boards are typically used in different environments. Countertop models are generally used by occasional ironers. Over-door and wall-mounted boards are preferred by space-constrained ironers."

: "."

***: "They are all used to iron on."

***: "No difference. Both are used to iron on."

***: "Primarily the same."

***: "There are no significant differences in uses for ironing tables and excluded ironing boards in the United States."

***: N/A

Firms were asked to describe the degree of interchangeability, if any, between the products (i.e., are they used in the same or similar applications). Their responses are as follows:

***: "Ironing tables and excluded ironing boards are highly interchangeable. Both are used in the same ways for the same jobs."

***: N/A

***: "Ironing boards are typically smaller and/or more easily stored than ironing tables. Therefore, in situations which space and storage are concerns, ironing boards may often be a better choice than an ironing table. However, it appears that the same articles could be pressed on either. In addition, in some applications, the absence of a mesh top may make use of an ironing board less desirable than an ironing table."

***: "Yes."

***: "They are 100 % interchangeable."

***: "The only differences are (a) convenience, (b), storage, and the size of ironing surface."

***: "There are limits to the interchangeability between the subject ironing tables and the excluded boards. The excluded boards are typically purchased for use in environments where space constraints exist, e.g., small rental apartments, dormitory rooms, and mobile homes. Note, for example, the following text used at The Container Store outlets to market *** over-door ironing board:

> When space is a pressing problem, iron out the solution with our space-saving over-door ironing board. Opens out for use, the folds up flat for storage. Ideal for apartment renters, dorm room residents, & others with space constraints.

See also Bed, Bath & Beyond's website, where *** over door ironing board is described as follows:

> No room for an ironing board? Try this over-the-door board. It hangs over all standard doors and folds up or down with ease. Locks in upright position. Comes with 100% cotton cover and foam pad. Surface measures 14" W x 42" L. Super for small apartments and dorm rooms where space is at a premium.

In larger living areas, where space is less of an issue, conventional floor-standing, ironing tables are usually preferred. Compared to the over-door (or wall-mounted) ironing board, which can be used at only one location, the floor-standing unit obviously provides much greater versatility, as it is capable of being used in virtually any room - in front of a television receiver, in view of children or pets, etc. While the countertop or tabletop board has portability, persons who do ironing, if not limited by space constraints, usually prefer to perform the task on a standard height ironing table rather than on a tabletop board that is placed on another table."

Firms were asked to describe any similarities and/or differences in the channels of distribution for the products. Their answers are as follows:

***: "I am not aware of any significant differences in the channels of distribution for ironing tables versus excluded ironing boards."

***: N/A

***: "Both are sold through similar channels of distributions."

***: "Both are sold at retail."

***: "Floor-standing, metal-top ironing boards are sold to distributors servicing the hospitality (hotel) market. Excluded ironing boards typically are not. With the exception of wall-mounted boards, all other included tables and excluded boards are sold in mass-market channels."

***: "No."

***: "None."

Firms were asked to describe, to the best of their knowledge, any similarities and/or differences in customer and producer perceptions of the products. Their responses are as follows:

***: "There is a perception among both producers and consumers that floor-standing ironing tables and excluded ironing boards fill different needs of differently situated consumers. The excluded boards are viewed as niche products by producers and mass retail consumers. Floor-standing models are viewed as volume selling "standards" by these same groups."

***: "I do not believe customers or producers have any significant differences in perception between ironing tables and excluded ironing boards in the U.S. market, although certain consumers might prefer one type of ironing board or table to another, depending on the space and layout of the room in which they do their ironing."

***: N/A

: " exclusively sells standard *** ironing tables with ***."

***: "Very little difference."

***: "Excluded tend to be viewed as space saving or portable and more likely to be promoted during "Back To School" season."

: " is unaware of the difference or similarities in customer and producer perception of ironing tables versus ironing boards."

Firms were asked to explain whether the products are made in common (i.e., the same or shared) manufacturing facilities, using common production processes, and production employees. Their responses are as follows:

***: "To the best of my knowledge, the materials and equipment used to manufacture the ironing surfaces for both ironing tables and excluded ironing boards in the United States are the same. I am not sure about the legs and other mounting hardware. I do not manufacture ironing tables, nor do I typically purchase ironing tables or excluded ironing boards from U.S. manufacturing facilities. Accordingly, I am not in a position to comment upon whether ironing tables and excluded boards are made in common facilities, use common production processes, or use common production employees."

***: N/A

***: "Countertop or tabletop ironing boards are not produced in the U.S. Over-door ironing boards and floor-standing ironing tables (but not wall-mounted boards) are made in a common U.S. facility, using common production processes and production employees."

***: "Yes."

***: "Cannot answer. We are all importer, not a manufacturer."

***: "To the best of *** knowledge, it appears that some such products are made in common, while others are not."

***: "Largest share of countertop ironing boards are made with wood tops. Current trends are moving to expanded metal, but largest market share is still wood."

Firms were asked to describe any similarities and/or differences in the prices of the products. Their responses are as follows:

***: N/A

***: N/A

***: "Excluded product is smaller and usually lower priced."

***: "Pricing is similar."

***: "Very broad question. The Over-the-door is price similar to floor-standing, where the countertops are less expensive due to size and simple material cost."

***: "With the exception of certain, extremely high-end ironing tables (priced at retail near or above $100), metal-top, floor-standing ironing tables sell in the retail range of $9 to $49. The T-Leg ironing table, the opening price point model which accounts for about 75 percent of the floor-standing ironing table market, currently sells at about $9 to $15. In contrast to the T-Leg, the over-door or wall-mounted ironing board currently retails for about $15 to $25, while the countertop or tabletop boards now typically sell at retail for $5 to $10."

***: "Ironing tables tend to cost slightly more than countertop or tabletop boards, primarily because they cost slightly more to produce (average retail price difference of $4.00-$5.00 between opening price point T-Leg ironing table and opening price point tabletop board). Wall-mounted boards are typically significantly more expensive than opening price point ironing tables, because they contain hardware necessary for installation in a wall (cabinet, etc.), but they are only slightly more expensive than ultra high-end ironing tables. Over-the-door ironing boards typically retail for slightly more than ironing tables (about $3.00 more at the opening price point)."