

1975

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UNITED STATES INTERNATIONAL TRADE COMMISSION

**FOOTWEAR FOR WOMEN:
WORKERS OF THE NORTHLAND SHOE CORP., FRYEBURG,
MAINE, AND EASTLAND SHOE CORP., FREEPORT,
MAINE, WHOLLY OWNED SUBSIDIARIES
OF STANDARD PRUDENTIAL CORP.,
NEW YORK, N. Y.**

**Report to the President
on Investigation No. TEA-W-263
Under Section 301(c)(2) of the Trade Expansion
Act of 1962**

**ITC Publication 725
Washington, D. C.
March 1975**

UNITED STATES INTERNATIONAL TRADE COMMISSION

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Note.--The whole of the Commission's report to the President may not be made public since it contains certain information that would result in the disclosure of the operations of an individual concern. This published report is the same as the report to the President, except that the above-mentioned information has been omitted. Such omissions

REPORT TO THE PRESIDENT

U.S. International Trade Commission,
March 20, 1975

To the President:

In accordance with section 301 of the Trade Expansion Act of 1962 (TEA) (19 U.S.C. 1901), the U.S. International Trade Commission herein reports the results of investigation No. TEA-W-263 made under section 301(c)(2) of the act to determine whether, as a result in major part of concessions granted under trade agreements, articles like or directly competitive with footwear for women (of the types provided for in items 700.45 and 700.55 of the Tariff Schedules of the United States (TSUS)) produced by Northland Shoe Corp., Fryeburg, Maine, and Eastland Shoe Corp., Freeport, Maine, wholly owned subsidiaries of Standard Prudential Corp., New York, N.Y., are being imported into the United States in such increased quantities as to cause, or threaten to cause, the unemployment or underemployment of a significant number or proportion of the workers of such firm or an appropriate subdivision thereof.

The investigation was instituted on February 6, 1975, on the basis of a petition for adjustment assistance filed on behalf of the former workers of Northland Shoe Corp., Fryeburg, Maine. The petition was received on January 30, 1975.

Notice of the investigation was published in the Federal Register (40 F.R. 6545) on February 12, 1975. No public hearing was requested, and none was held.

In the course of its investigation, the Commission obtained information from the petitioners; officials and customers of Northland Shoe Corp., Eastland Shoe Corp., and the parent firm, Standard Prudential Corp.; official Government statistics; and the Commission's files.

This is the second investigation conducted by the Commission with respect to a wholly owned subsidiary of Standard Prudential Corp. An investigation (TEA-W-232) 1/ was instituted on March 22, 1974, on the basis of a petition for adjustment assistance, received on March 18, 1974, on behalf of the workers and former workers of Westland Shoe Corp., Biddeford, Maine. In that investigation the Commission (Commissioner Ablondi dissenting, Commissioners Leonard and Young not participating) made an affirmative determination with respect to the workers engaged in the production of women's footwear.

On June 21, 1974, the Department of Labor certified that the workers of Westland Shoe Corp. engaged in the manufacturing of women's footwear who were unemployed or underemployed since August 25, 1973, were eligible to apply for adjustment assistance benefits.

1/ Footwear for Men and Women: Workers and Former Workers of the Westland Shoe Corp., Biddeford, Maine, a Wholly Owned Subsidiary of Standard Prudential Corp., New York, N.Y.: Report to the President on Investigation No. TEA-W-232 . . . , TC Publication 674, 1974.

A petition on behalf of Westland Shoe Corp. workers was filed with the Commission on Jan. 7, 1974, which resulted in the institution of investigation No. TEA-W-222 on Jan. 10, 1974. That investigation was dismissed without prejudice, Commissioners Leonard and Young dissenting, on Mar. 4, 1974, because information needed by the Commission to make a determination on the merits was not made available (39 F.R. 9720).

Finding of the Commission

On the basis of its investigation, the Commission finds unani-
mously that articles like or directly competitive with the footwear for
women (of the types provided for in items 700.45 and 700.55 of the
Tariff Schedules of the United States) produced by Northland Shoe Corp.,
Fryeburg, Maine, and Eastland Shoe Corp., Freeport, Maine, wholly owned
subsidiaries of Standard Prudential Corp., 1/ New York, N.Y., are not as
a result in major part of concessions granted under trade agreements,
being imported into the United States in such increased quantities as
to cause, or threaten to cause, the unemployment or underemployment of
a significant number or proportion of the workers of such firm or an
appropriate subdivision thereof.

1/ The finding of Vice Chairman Parker is limited to Northland Shoe Corp.

Views of Chairman Bedell, and
Commissioners Moore and Ablondi 1/

This statement sets forth the reasons for our negative determination in the instant investigation under section 301(c)(2) of the Trade Expansion Act of 1962. The investigation was instituted on the basis of a petition filed on behalf of the former workers of Northland Shoe Corp., Fryeburg, Maine. The investigation covered the integrated footwear operations of Northland Shoe Corp., and Eastland Shoe Corp., Freeport, Maine, wholly owned subsidiaries of Standard Prudential Corp., New York, N.Y.

The output of the integrated operations of Eastland and Northland consisted principally of women's hand-sewn and machine-sewn moccasins, types generally known as loafers, that retailed from about * * * a pair.

The petitioning workers at the Northland plant performed contract stitching operations and hand sewing operations on footwear uppers for the Eastland plant when that plant did not have adequate capacity to fill all of its orders.

Under section 301(c)(2) of the TEA, the Commission in order to make an affirmative decision must find that--

- (1) Articles like or directly competitive with those produced by the workers' firm are being imported in increased quantities;

1/ Vice Chairman Parker concurs in the result with respect to Northland Shoe Corp. only.

- (2) The increased imports are a result in major part of concessions granted under trade agreements;
- (3) A significant number or proportion of the workers of the firm, or an appropriate subdivision thereof, are unemployed or underemployed, or threatened with unemployment or underemployment; and
- (4) The increased imports resulting in major part from trade-agreement concessions are the major factor in causing or threatening to cause the unemployment or underemployment of the workers.

We have made a negative determination because the fourth condition has not been met; that is, increased imports of footwear like or directly competitive with the footwear produced at the Northland and Eastland plants were not the major factor causing, or threatening to cause, the unemployment or underemployment of the workers.

Total sales of women's footwear produced at the Eastland plant including those for which Northland provided stitching services increased in both 1973 and 1974. Moreover, the investigation revealed that the major customers of Eastland that reduced their purchases from that firm in recent years switched primarily to other domestic producers and not to imports. The principal reason given by these firms for their reduced purchases from Eastland was a decline in demand for the types of shoes (loafers) produced by that firm.

Although Eastland's total sales of footwear increased in 1973 and 1974 an official of the firm advised the Northland plant was closed on January 24, 1975, because the firm projected a sharp decline in its

1975 sales. This anticipated decline in sales was primarily attributed by the company official to the general economic conditions prevailing in the United States in 1975 and not to any increase in import competition.

On the basis of the information obtained in the investigation, we conclude that concession-generated imports were not the major factor in causing the unemployment or underemployment of the Northland or the Eastland workers.

View of Commissioner Leonard

My determination in the instant case is negative because one of the criteria has not been met, i.e., that the increase in imports of footwear for women like or directly competitive with that produced by Northland Shoe Corp., Fryeburg, Maine, and Eastland Shoe Corp., Freeport, Maine, wholly owned subsidiaries of Standard Prudential Corp., New York, N.Y., is the result in major part of concessions granted under trade agreements. My reasoning in support of this determination is set forth in a statement of my views in an earlier Commission investigation under the Trade Expansion Act. 1/

1/ Nonrubber Footwear: Report to the President on Investigation No. TEA-I-18 . . . , TC Publication 359, 1971, pp. 31-47.

View of Commissioner Minchew

In response to the petition filed on behalf of the former workers of the Northland Shoe Corp., Fryeburg, Maine, a wholly owned subsidiary of Standard Prudential Corp., New York, N.Y., for a determination of their eligibility to apply for adjustment assistance under section 301(c)(2) of the Trade Expansion Act of 1962 (TEA), I have concluded that the statutory requirements set forth in section 301(c) of that act are not met and, accordingly, I have made a negative determination.

The TEA sections 301(c)(2) and (3) state that--

(2) In the case of a petition by a group of workers for adjustment assistance under chapter 3, the United States International Trade Commission shall promptly make an investigation to determine whether, as a result in major part of concessions granted under trade agreements, an article like or directly competitive with an article produced by such workers' firm, or an appropriate subdivision thereof, is being imported into the United States in such increased quantities as to cause, or threaten to cause unemployment or underemployment of a significant number or proportion of the workers of such firm or subdivision.

(3) For purposes of paragraph . . . 2, increased imports shall be considered to cause, or threaten to cause, serious injury to a firm or unemployment or underemployment, as the case may be, when the United States International Trade Commission finds that such increased imports have been the major factor in causing or threatening to cause, such injury or unemployment or underemployment.

I have concluded that the statutory requirements are not met in this case because the unemployment of the petitioning workers is attributable to factors other than increased imports. Employment at Northland actually increased in 1973 and 1974 before it was terminated entirely in

January 1975. This termination of employment in 1975 appears to have been more a result of changes in demand (specifically a reduced market for loafers, a principal product of the firm) rather than an increase in imports.

INFORMATION OBTAINED IN THE INVESTIGATION

Introduction

Northland Shoe Corp., Fryeburg, Maine, performed contract stitching and hand-sewing operations on women's casual footwear for Eastland Shoe Corp., Freeport, Maine. Both of these corporations are wholly owned subsidiaries of Standard Prudential Corp., New York, N.Y., and are the two remaining members of Standard Prudential's Eastland Shoe Group. 1/ (The Westland Shoe Corp., Biddeford, Maine, a former member of the Eastland Shoe Group, ceased production on March 14, 1974, and was the subject of investigation No. TEA-W-232.) The scope of this investigation includes the integrated production of footwear by Northland Shoe Corp. and Eastland Shoe Corp. Northland Shoe Corp. also performed contract stitching operations for Converse Rubber Corp. from October 1972 through June 1974.

1/ Northland Shoe Corp. terminated operations on Jan. 24, 1975.

Description of Articles

The output of the integrated operations of the Eastland and Northland plants consisted principally of women's hand-sewn and machine-sewn moccasins, types generally known as loafers. Styles included the basic moccasin design as well as more up-to-date moc-toe designs with higher heels. A small amount of Eastland's production included women's suede desert boots. Prior to 1974 the plants primarily produced shoes with leather uppers. According to company officials, in 1974 the factories began producing about 50 percent of the shoes using manmade materials because of the scarcity of hides in recent years. The women's leather shoes retailed in the range of about * * * a pair; shoes with urethane uppers retailed in the range of about * * * a pair.

The basic principle of moccasin shoe construction is the use of a simple piece of leather. In its more popular and modern forms, the moccasin consists of more than a single piece of material for greater protection and longer wear. The outsole of the single-sole type is attached to the moccasin bottom with one or two rows of Littleway lockstitches which are sewn in grooves. The plug piece over the cap of the foot is the particular identifying characteristic of this construction.

Moccasins, whether hand-sewn or machine-sewn, are one of the most traditional of the variety of footwear styles. Such footwear obtained its greatest popularity in the fifties, but suffered a marked decline in consumer acceptance beginning in the mid sixties. However, while most fashion emphasis in recent years has focused on high heels and platforms, there has been a strong rebirth of interest in low-heeled classic moccasin designs for casual wear. Updated variations of

moccasins with higher heels, a type produced at Eastland and Northland, have become classics in women's sportswear apparel. Other casual footwear for women includes certain sandals and clogs, espadrilles, indoor-outdoor slippers, oxfords, desert boots, and sneakers.

It is estimated that about 50 percent of the women's and misses' non-rubber shoes produced in the United States in 1973 had leather uppers, compared with nearly 70 percent in 1970. The American Footwear Industries Association (AFIA) indicates that, owing to the recent shortage of hides and the consequent increases in prices of leather, prices of women's and misses' leather footwear have risen steadily. The president of the AFIA has further indicated that, as the prices of leather footwear increased, shoes made from manmade materials--polyurethane, polymerics, and nylon velvets--gained a larger percentage of the U.S. market. Manmade materials lend themselves not only to the multihued new platform styles favored by young people, but also to the more conservative styles. The following AFIA data illustrate the changes in the shares of the total U.S. nonrubber footwear market supplied by leather and by manmade materials.

Percentages of total U.S. output of nonrubber footwear accounted for by uppers of leather and by uppers of manmade materials, specified years 1950 to 1975

Year	Leather	Manmade materials
1950-----	85 :	15
1960-----	76 :	24
1972-----	60 :	40
1973-----	54 :	46
1975 <u>1/</u> -----	50 :	50

1/ Estimated.

Source: Compiled from data supplied by the American Footwear Industries Association.

Industry sources report that, owing to recent and possibly worsening shortages of materials derived from petrochemicals, a reversal in the trend indicated above is possible.

U.S. Tariff Treatment

Applicable TSUS items

Imports of women's leather footwear of the type produced by Eastland Shoe Corp. and Northland Shoe Corp. are dutiable under TSUS item 700.45. Footwear with uppers of vinyl and similar in appearance, construction, and price to footwear produced by Eastland and Northland is entered under item 700.55.

Imports entered under item 700.45, which provides for certain footwear of leather having a foreign (export) value of over \$2.50 a pair, consist predominantly of women's footwear in a wide range of styles, types, and prices. In terms of quantity, a substantial part of the imports entered under this item in recent years have consisted of women's moderately priced dress and casual shoes that are sold in the retail-price range of about \$8 to \$20 a pair.

U.S. imports dutiable under item 700.55, which consist primarily of footwear with supported-vinyl uppers, have in recent years consisted predominantly of two groups: (1) street shoes of sturdy construction, produced in a single width for each particular length, for sale at self-service counters in variety stores, discount stores, and department-store basements, and (2) folding slippers, sandals, and other inexpensive footwear. It is believed that before 1970 only a negligible portion of the annual imports of women's dress shoes and boots admitted under item 700.55 retailed at more than \$10 a pair; in the period 1971-73, less than 10 percent did so.

Rates of duty

Under the Tariff Act of 1930, women's leather footwear of cement-process construction was originally dutiable under paragraph 1530(e) at 20 percent ad valorem. The duty on such footwear, if valued over \$2.50 a pair (item 700.45), was reduced in five annual stages from 20 percent ad valorem in 1967 to 10 percent in 1972, pursuant to concessions granted during the sixth (Kennedy) round of negotiations under the General Agreement on Tariffs and Trade (GATT).

Supported vinyl was not used for uppers until the late 1940's or early 1950's. Prior to the effective date of the TSUS, imports of women's supported-vinyl-upper footwear, which were dutiable under various provisions of the Tariff Act, were classified principally--

- (1) By similitude, at the rate of 20 percent ad valorem applicable to leather footwear provided for in paragraph 1530(e). 1/
- (2) Under paragraph 1537(b) as articles in chief value of rubber, at the trade-agreement rate of 12.5 percent ad valorem where the soles were of india rubber and constituted the chief value of the footwear in question.
- (3) Under paragraph 1539(b) at the reduced rate of 21 cents per pound plus 17 percent ad valorem where the footwear was in chief value of a product having a synthetic resin as the chief binding agent.

In the TSUS a rate of 12.5 percent ad valorem was established for item 700.55 as the trade-agreement rate to replace the wide range of rates previously applicable to the various types of footwear provided for in

1/ The principal kinds of footwear with supported-vinyl uppers now being imported (i.e., those with soles of vinyl or other plastics) would have been dutiable by virtue of the similitude provision under par. 1530(e) at a rate of 20 percent ad valorem.

this item. 1/ This rate was reduced in five stages to 6 percent ad valorem as the result of concessions granted in the Kennedy round of trade negotiations.

Table 1 in appendix A shows the reductions in rates of duty resulting from trade-agreement concessions granted under the GATT for footwear of the types now dutiable under items 700.45 and 700.55. Tables 2 and 3 show U. S. imports of women's shoes admitted under the TSUS items mentioned above and the applicable rates of duty.

1/ The col. 2 rate of duty for item 700.55 is 35 percent.

U.S. Consumption, Production, and Imports

During the period 1965-74, apparent annual U.S. consumption of women's and misses' nonrubber footwear (including dress and casual) rose from an estimated 386 million pairs in 1965 to a peak of 455 million pairs in 1968 and then declined to an estimated 355 million pairs in 1974. Annual U.S. production of such footwear declined from 319 million pairs in 1965 to an estimated 170 million pairs in 1974. Annual U.S. imports almost tripled during this period, and their share of the market increased without interruption from 17 percent in 1965 to 53 percent in 1973, then declined to an estimated 52 percent in 1974, as shown in the table on the following page (see also the figure on p. A-10, which shows the trends of U.S. production, imports, and consumption). Italy and Spain have been the principal suppliers of women's dress and casual leather footwear; the Republic of China (Taiwan) and Japan, the principal suppliers of such types of footwear made with vinyl uppers.

Nonrubber footwear for women and misses: U.S. production, imports for consumption, and apparent consumption, 1965-74

Period	Production <u>1/</u>	Imports <u>2/</u>	Apparent consumption <u>3/</u>	Ratio of imports to apparent consumption
	Million pairs	Million pairs	Million pairs	Percent
1965-----	319	67	386	17
1966-----	323	70	393	18
1967-----	290	96	386	25
1968-----	322	133	455	29
1969-----	271	139	410	34
1970-----	260	165	425	39
1971-----	237	180	417	43
1972-----	223	198	421	47
1973-----	190	212	402	53
1974 <u>4/</u> -----	170	185	355	52

1/ Production represents the output of women's and misses' footwear as reported by the U.S. Bureau of the Census, plus shipments to the U.S. mainland from Puerto Rico.

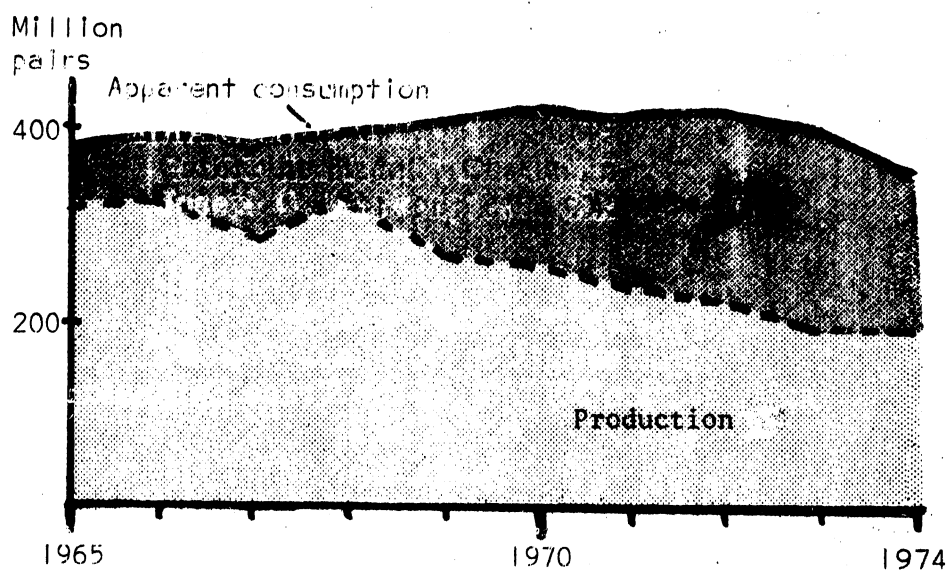
2/ Partly estimated from the official statistics for footwear of the kinds described in pt. 1A of schedule 7 of the TSUSA, except imports described in items 700.32, 700.51, 700.52, 700.53, and 700.60 and except zoris (very inexpensive thonged sandals of rubber or plastics), dutiable under item 700.55. Includes imports of misses' footwear, which have been negligible compared with those of women's.

3/ Computed from U.S. production plus imports without an allowance for exports, which in 1974 amounted to about 1.5 million pairs.

4/ Estimated.

Source: Compiled from official statistics of the U.S. Department of Commerce, except as noted.

Nonrubber footwear for women: U.S. production, imports, and apparent consumption, 1965-74



Source: Table on p. A-9.

U.S. and Foreign Wage Rates

The table on the following page shows the average hourly earnings and the estimated compensation per hour received by shoe workers in eight countries in 1971-73. While of some use in comparing the labor costs of the shoe industries in the various countries listed, the table has several shortcomings that make such comparisons inexact. First, only in the United States, Italy, and Hong Kong is the industry definition limited exclusively to footwear. In the other countries the industry classifications are more encompassing. Second, as footnote 1 to the table indicates, published hourly earnings in the various countries differ in composition. Third, total compensation for workers includes varying factors in the eight countries.

Hourly earnings of production workers and estimated total compensation per hour worked in specified industries related to 8 countries, 1971-73

Country	Industry	(In U.S. dollars)					
		Published average hourly earnings 1/			Estimated compensation per hour worked 2/		
		1971	1972	1973	1971	1972	1973
Brazil	Clothing and footwear 3/ 4/	\$0.32	\$0.34	\$0.38	\$0.41-\$0.45	\$0.45-\$0.48	\$0.49-\$0.53
Hong Kong	Rubber footwear 5/	.38	.43	.50	.41-.43	.47-.50	.55-.58
Italy	Footwear 6/	.80	.93	1.08	1.49	1.70	2.00
Japan	Rubber products, including plastic footwear. 7/	1.08	1.57	2.10	1.23	1.78	2.39
Korea	Plastic products 7/	.22	.20	.32	.25-.29	.25-.27	.38-.41
Spain	Clothing and footwear 3/	.42	.53	.70	.59-.64	.74-.80	.99-1.06
Taiwan	Plastic products 7/	8/ 9/	.19	.26	8/	.22-.23	.30-.32
United States	Footwear, excluding rubber	2.53	2.63	2.72	3.05	3.19	3.32

1/ Published earnings do not represent the same items of labor compensation in each country because of differences in the various treatments of various supplementary benefits. Earnings generally refer to gross cash payments to wage workers before deductions for taxes and social security and include overtime pay, shift differentials, regular bonuses and premiums, and cost-of-living adjustments. Holiday, vacation, and sick leave pay, bonuses not paid regularly each pay period, and other supplementary benefits are included by some countries and excluded by others. The earnings data are per paid hour for some countries and per hour worked for other countries.

2/ Compensation refers to all payments made by employers directly to their workers before deductions of any kind plus employer contributions to legally required insurance programs and private welfare plans for the benefit of employees. The figures on additional compensation per hour worked as a percentage of published earnings are the best estimates currently available to the Bureau of Labor Statistics.

3/ All employees.

4/ Wage adjustments in Brazil are governed by an official wage formula. The 1972 and 1973 earnings figures are estimates based on the average wage adjustments granted in the total private sector of the economy.

5/ Daily earnings converted to an hourly basis by assuming 9 hours of work per day.

6/ Approximately 15 percent of the workers in the Italian shoe industry are home workers, who are paid at a lower wage rate than the factory workers in the industry.

7/ The shoes shipped from Japan, Korea, and Taiwan to the United States are principally of plastics. Approximately half of the workers in the Japanese plastics shoe industry are home workers, who are paid at a lower rate than the factory workers in that industry.

8/ Not available.

9/ For July-December 1972.

Source: Based on data provided by the U.S. Bureau of Labor Statistics from the following: Brazil--Industries de Transformacao, 1971, Department of Industry, Trade and Services, Brazil; Hong Kong--Annual Department Report, 1970-73, Commissioner of Labour, Hong Kong; Italy--Rassegna di Statistiche del Lavoro, various issues, Confederazione General dell'Industria Italiana, Rome; Japan--Year Book of Labour Statistics, various issues, Ministry of Labour, Tokyo; Korea--Monthly Statistics of Korea, various issues, Economic Planning Board, Seoul; Spain--Year Book of Labour Statistics, 1973 International Labour Office, Geneva; and Taiwan--Monthly Bulletin of Labor Statistics, June 1973, Directorate-General of Budget, Accounting, and Statistics, Taipei. Conversion from the currencies of the foreign countries in the table to U.S. dollars was made on the basis of average daily exchange rates.

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Data Relating to the Gardiner Shoe Co., Inc.

* * * * *

APPENDIX A
STATISTICAL TABLES

Table 1.--U.S. rates of duty applicable to women's and misses' footwear of the types provided for in specified TSUS items, July 1, 1934, and GATT concessions to Jan. 1, 1975

TSUS item No.	Abbreviated description	Rate of duty	
		July 1, 1934 <u>1/</u>	GATT concessions <u>2/</u>
		Rate	Effective date
		Percent	Percent
		<u>ad val.</u>	<u>ad val.</u>
700.45	Leather footwear: "Other" (including cement process): Valued over \$2.50 per pair-----	20	18 : Jan. 1-Dec. 31, 1968. 16 : Jan. 1-Dec. 31, 1969. 14 : Jan. 1-Dec. 31, 1970. 12 : Jan. 1-Dec. 31, 1971. 10 : Jan. 1, 1972 to date.
700.55	Footwear having uppers of supported vinyl.	Princi- 4/ pally 12.5 : Aug. 31, 1963-Dec. 31, 1967. 20 3/ 11 : Jan. 1-Dec. 31, 1968. 3/ 10 : Jan. 1-Dec. 31, 1969. 8.5 : Jan. 1-Dec. 31, 1970. 7 : Jan. 1-Dec. 31, 1971. 6 : Jan. 1, 1972 to date.	

1/ Except as noted, the rate on July 1, 1934, was the same as the original rate in the Tariff Act of 1930, effective June 18, 1930.

2/ For concessions granted in the Kennedy Round, effective Jan. 1, 1968, the table shows staged rates that became effective up to and including Jan. 1, 1972.

3/ Supported vinyl was not used for shoe uppers until the late 1940's or early 1950's. When footwear with supported-vinyl uppers was imported during the 1950's and early 1960's, it was generally dutiable, by virtue of the similitude provisions of par. 1559, at the rate provided for "similar" leather footwear in par. 1530(e). The col. 2 rate for item 700.55 is 35 percent.

4/ The trade-agreement rate established in the TSUS, effective Aug. 31, 1963, under authority of the Tariff Classification Act of 1962 (Public Law 87-456) to replace the wide range of rates previously applicable to the various types of footwear provided for in this TSUS item.

Table 2.--Women's and misses' footwear with leather uppers (TSUS item 700.45): U.S. rates of duty and imports of consumption, 1969-73, January-June 1973, and January-June 1974

Period	Rate of duty	Imports		
		Quantity	Value	Unit value
		<u>1,000</u> <u>pairs</u>	<u>1,000</u> <u>dollars</u>	<u>Per pair</u>
	<u>Percent</u> <u>ad valorem</u>			
1969-----	16	26,745	131,329	\$4.91
1970-----	14	34,164	172,266	5.04
1971-----	12	43,725	220,504	5.04
1972-----	10	60,912	303,406	4.98
1973-----	10	68,248	355,406	5.21
January-June--				
1973-----	10	40,707	198,464	4.88
1974-----	10	33,192	173,380	5.22

Source: Compiled from official statistics of the U.S. Department of Commerce.

Table 3.--Women's and misses' footwear with supported-vinyl uppers (TSUS item 700.55): U.S. rates of duty and imports for consumption, 1966-73, January-June 1973, and January-June 1974

Period	Rate of duty	Imports		
		Quantity	Value	Unit value
		<u>1,000</u> <u>pairs</u>	<u>1,000</u> <u>dollars</u>	<u>Per pair</u>
	<u>Percent</u> <u>ad valorem</u>			
1966-----	12.5	33,239	17,024	\$0.51
1967-----	12.5	49,767	27,704	.56
1968-----	11	68,579	46,603	.68
1969-----	10	70,777	55,820	.79
1970-----	8.5	77,288	73,757	.95
1971-----	7	86,942	104,196	1.20
1972-----	6	89,776	109,915	1.22
1973-----	6	96,942	136,036	1.40
January-June--				
1973-----	6	54,317	63,856	1.18
1974-----	6	48,057	80,237	1.67

Source: Compiled from official statistics of the U.S. Department of Commerce.

APPENDIX B

LETTER RECEIVED FROM A CUSTOMER OF
EASTLAND SHOE CORP.

* * * * *