

UNITED STATES INTERNATIONAL TRADE COMMISSION

METAL-WALLED ABOVE-GROUND SWIMMING
POOLS FROM JAPAN

Determination of Likelihood of Injury in
Investigation No. AA1921-165
Under the Antidumping Act, 1921, as
Amended, Together with the
Information Obtained in the Investigation



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UNITED STATES INTERNATIONAL TRADE COMMISSION

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Note.--The whole of the Commission's report may not be made public since it contains certain information that would result in the disclosure of the operations of individual concerns. Such omissions are indicated by asterisks.

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

[AA1921-165]

METAL-WALLED ABOVE-GROUND SWIMMING POOLS FROM JAPAN

Determination of Likelihood of Injury

On March 29, 1977, the United States International Trade Commission received advice from the Department of the Treasury that metal-walled above-ground swimming pools from Japan are being, or are likely to be, sold in the United States at less than fair value within the meaning of the Antidumping Act, 1921, as amended (19 U.S.C. 160(a)). Accordingly, on April 5, 1977, the Commission instituted investigation No. AA1921-165 under section 201(a) of said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States.

Notice of the institution of the investigation and of a public hearing to be held in connection therewith was duly given by posting copies thereof in the Office of the Secretary, United States International Trade Commission, Washington, D.C., and at the Commission's New York Office, and by publishing the notice in the Federal Register of April 11, 1977 (42 F.R. 18906). On May 12, 1977, a hearing was held in accordance with the notice, and all persons requesting the opportunity were permitted to appear by counsel or in person.

In arriving at its determination, the Commission gave due consideration to all written submissions from interested parties and information adduced at the hearing as well as information obtained by the Commission's staff from questionnaires, personal interviews, and other sources.

On the basis of the investigation, the Commission (Chairman Minchew and Commissioner Ablondi dissenting) has determined that an industry in the United States is likely to be injured by reason of the importation of metal-walled above-ground swimming pools from Japan that are being, or are likely to be, sold at less than fair value within the meaning of the Antidumping Act, 1921, as amended.

By order of the Commission:

Kenneth R. Mason
Secretary

Issued: June 29, 1977

Statement of Reasons for Affirmative Determination of
Vice Chairman Joseph O. Parker and Commissioners
George M. Moore and Catherine Bedell

On April 5, 1977, the U.S. International Trade Commission instituted investigation No. AA1921-165 under section 201(a) of the Antidumping Act, 1921, as amended. This investigation was made to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation into the United States of metal-walled above-ground swimming pools from Japan which the Department of the Treasury has determined are being, or are likely to be, sold at less than fair value (LTFV) within the meaning of the act. In order to make an affirmative decision, the Commission must find two conditions satisfied in this investigation. First, it must find that an industry in the United States is being or is likely to be injured or is prevented from being established. 1/ Second, any injury or likelihood of injury must be by reason of the importation into the United States of the class or kind of foreign merchandise which the Treasury has determined is being, or is likely to be, sold at LTFV. We have determined that an industry in the United States is likely to be injured by reason of the importation of the subject articles which the Department of the Treasury has determined are being or are likely to be sold at LTFV.

1/ Prevention of the establishment of an industry is not an issue in the instant case and will not be discussed further.

LTFV sales

The Department of the Treasury investigated U.S. imports of metal-walled above-ground swimming pools from Japan during the period November 1, 1975, through April 30, 1976. For that period, Asahi Chemical Industry Co., Ltd., (Asahi) supplied approximately 90 percent of all Japanese exports of above-ground pools to the United States, according to information developed by the Department of the Treasury. Fair value comparisons were made on almost all sales of the subject merchandise sold in the United States by Asahi during the period of investigation. Treasury found margins on Asahi's sales in the United States ranging from 1 percent to 32 percent on approximately 47 percent of the sales compared. The weighted average margin on all sales was 3.5 percent. Margins were found on all sizes of metal-walled above-ground pools exported by Asahi to the United States.

The imported article and the domestic industry

Metal-walled above-ground swimming pools are recreational pool structures which can be taken apart and reassembled. Such pools differ from other types of swimming pools, such as inflatable children's pools and the larger in-ground and on-ground pools, in that they are both noninflatable and transportable. Above-ground swimming pools are normally categorized into two groups: splashers and family pools. Splashers, which are circular, range from about 6 feet to 12 feet in diameter, and from 1 foot to 3 feet in depth. Family pools, which are circular or oval, are generally 15 feet or more in diameter and 4

feet in depth, although certain large models are up to 8 feet in depth at certain points.

We have considered the relevant domestic industry in this investigation to consist of the U.S. facilities devoted to the production of metal-walled above-ground swimming pools. There are eight known manufacturers of metal-walled above-ground swimming pools in the United States, three of which account for more than 80 percent of annual U.S. producers' shipments. Sales of family pools accounted for approximately 90 percent of the value of U.S. producers' shipments of all above-ground pools in 1975 and 1976.

Likelihood of injury by reason of LTFV sales

U.S. imports from Japan of all metal-walled above-ground pools have accounted for over 60 percent of apparent U.S. consumption from 1975 through January-March 1977. In 1976, the year in which most LTFV sales occurred, imports from Japan climbed to their highest level for the 1973-76 period. To fully understand the effect of imports of metal-walled above-ground pools from Japan on the domestic industry, it is necessary to review the recent history of such imports with respect to specific pool categories.

Imports of splasher pools from Japan first entered the U.S. market in significant quantities in the late 1960's. Such imports increased so rapidly that by 1976 they accounted for almost 90 percent of apparent U.S. consumption of such pools. A number of these imports, in 1976, were found by Treasury to be sold in the United States at LTFV.

In 1975, the first imports of family pools from Japan (all of which were from Asahi) entered the U.S. market, accounting for less than 5 percent of apparent U.S. consumption of such pools in that year. In 1976, however, such imports increased significantly and accounted for more than 10 percent of apparent U.S. consumption of family pools. All the family pools imported from Japan during 1975, and most of those imported during 1976, entered during the period in which Treasury found LTFV sales.

The recent increase in imports of metal-walled above-ground pools from Japan, particularly family pools, together with a drop in demand in 1975, has had an impact on the operations of U.S. producers. U.S. producers' shipments of all metal-walled above-ground pools declined from a peak of 249,000 pools in 1974 to 91,000 pools in 1975 and then increased to 133,000 pools in 1976--still 47 percent below the 1974 level. Shipments of family pools, which as indicated above constitute about 90 percent of the value of annual U.S. producers' shipments of all above-ground pools, declined from 123,000 pools in 1974 to 46,000 pools in 1975, and then increased to 76,000 pools in 1976--38 percent below the 1974 level.

The average number of production and related workers engaged in the manufacture of above-ground pools followed a trend similar to that for producers' shipments, declining from 611 in 1974 to 346 in 1975 and then increasing slightly to 415 in 1976--32 percent below the 1974 level.

The LTFV imports, if allowed to continue, could well exacerbate a trend of declining profits which the domestic industry has experienced in recent years. The net operating profit for the 3 U.S. producers, which account for over 80 percent of domestic shipments, declined from \$5.6 million in 1974 to \$2.7 million in 1975. In 1976, despite an increase in net sales, net operating profit continued to decline to \$2.5 million. The ratio of net operating profit to net sales for the 3 firms on their above-ground swimming pool operations declined from 13.7 percent in 1974 to 11.8 percent in 1975 and to 7.5 percent in 1976.

There is additional evidence that the domestic producers lost sales to LTFV imports from Japan and, if such imports continue, it is likely that they will injure the domestic industry. U.S. producers advised the Commission that sales lost to LTFV imports totaled \$2.3 million in 1975 and \$4.4 million in 1976. Officials of several of the firms listed by U.S. producers as having reducing purchases of domestically produced pools because of increased purchases of Japanese pools stated that price was the determinative factor in their decisions to begin importing pools from Japan or increase their imports. Fifteen U.S. purchasers of above-ground pools reported data to the Commission showing a displacement of purchases of U.S.-made pools by imports of Japanese pools during the period 1975 and 1976 and January-March 1977. Three large purchasers did not import any above-ground pools prior to 1975, but by 1976 they were importing virtually all their above-ground-pool requirements from Japan.

Price data collected by the Commission indicate that all sizes of above-ground pools imported from Japan undersell the domestic product, but that the margin of underselling is more pronounced with respect to family pools. Since 1975, when imports of family pools from Japan first entered the United States, such pools have been sold at prices averaging from 24 to 41 percent below those of U.S.-made pools. However, at the Commission's public hearing, the domestic industry maintained, and counsel for Asahi agreed, that the practical price advantage is much less. This is because U.S. producers provide their customers with numerous services that are not available from Japanese manufacturers. Such services include a form of easy financing that is written into the wholesale terms of sale allowing the pool dealer to pay for pools in July or August, although actual delivery may have taken place up to 7 months earlier. Furthermore, often pool producers do not force dealers to take delivery of pools previously ordered. The financing and flexibility in delivery provided by U.S. producers are not available for imports from Japan, which are purchased only through irrevocable letters of credit and require lengthy lead times. Taking such factors into consideration, it is believed that the real price advantage of imports from Japan is less than 10 percent. Consequently, the 3.5 percent average dumping margin found by Treasury is a significant factor in causing likelihood of injury to the domestic industry.

As noted above, it is evident that Japanese imports of splashers pools now dominate the U.S. market for these articles and the LTFV imports from Japan have also made significant inroads into the U.S. market for family pools. Information obtained in the investigation

indicate that Asahi is capable of significantly increasing its share of the U.S. family pool market by reason of its ability to expand production of metal-walled above-ground pools with existing equipment. In view of these considerations, the U.S. industry is likely to be injured if LTFV imports continue unabated.

Conclusion

On the basis of the evidence developed during this investigation, we have determined that an industry in the United States is likely to be injured by reason of the importation of metal-walled above-ground swimming pools from Japan which the Department of the Treasury has determined are being, or are likely to be, sold at LTFV.

Statement of Reasons for Negative Determination of
Chairman Daniel Minchew and Commissioner
Italo H. Ablondi

On March 29, 1977, the United States International Trade Commission (Commission) received advice from the Department of the Treasury (Treasury) that metal-walled above-ground swimming pools from Japan are being sold in the United States at less than fair value (LTFV) within the meaning of the Antidumping Act of 1921, as amended (19 U.S.C. 160(a)). Accordingly, on April 5, 1977, the Commission instituted investigation No. AA1921-165 under section 201(a) of the Act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States.

Before the Commission may find in the affirmative in this investigation, it is necessary that the following two conditions be met:

(1) An industry in the United States is being or is likely to be injured, or is prevented from being established,^{1/} and

(2) the requisite injury must be by reason of importation into the United States of the merchandise, which Treasury has determined is being, or is likely to be, sold at LTFV within the meaning of the Antidumping Act of 1921, as amended.

Determination

On the basis of information obtained in the investigation, we determine that there is no injury or likelihood of injury to an industry in the United States by reason of the importation of metal-

^{1/} Prevention of the establishment of an industry is not an issue in the instant investigation and will not be discussed further.

walled above-ground swimming pools from Japan.

The imported article and the domestic industry

Metal-walled above-ground swimming pools, the imported articles which are the subject of this investigation, are recreational structures which can be taken apart and reassembled. They differ from other types of swimming pools in that they are non-inflatable unlike many children's pools, and are transportable as opposed to the larger in-and-on-ground pools. The above-ground pools involved in this investigation are normally categorized as "splashers," which are smaller units, and the larger "family pools," generally having a diameter of 15 feet and over.

Approximately eight U.S. firms manufacture metal-walled above-ground swimming pools. These firms are the most likely to be affected by LTFV imports, and for the purposes of this determination are treated as the relevant domestic industry. Of the firms comprising this industry, the three largest account for over 80 percent of the total U. S. production of the pools in question.

No injury by reason of LTFV sales

The information gathered during the investigation indicates that the second condition as set out above, which must be met prior to an affirmative finding, is not satisfied in the instant case, i.e., any injury experienced by the domestic industry involved in the production of the subject swimming pools is not by reason of LTFV imports.

Import penetration and lost sales

The proportion of the U.S. market captured by pools imported from Japan is decreasing. The ratio of imports to total U.S. consumption of the subject swimming pools dropped by almost 3 percent from 1975 to 1976. Further decline occurred during the first quarter of 1977 for all pool sizes. Of particular importance is the marked decline in imports of family pools, for which the ratio decreased by more than 50 percent from that in the corresponding period of 1976. This sharp decline has special significance because family pools constitute the vast bulk of the value of all above-ground swimming pools sold in this country. Thus, the penetration exists for the most part in an area of relative insignificance to domestic operations. On the other hand, the import penetration is very small in the area of primary concern to the domestic industry (sales of family pools represent approximately 90 percent of the value of U.S. producers' shipments), and as the report reveals, this penetration is decreasing.

Furthermore, available data indicate that the current impact of LTFV margins is much less important than the overall Japanese price advantage with respect to this product. The Japanese price advantage in the sale of above-ground metal-walled pools is substantial, at 20-25 percent. Any injury to the domestic industry, therefore, would seem to be attributable to this significant price advantage and not to the 3.5-percent average weighted dumping margin. Although other factors such as financing arrangements and flexibility in delivery terms somewhat mitigate the considerable

Japanese price advantage, it remains highly influential. When contrasted to the relatively low dumping margin, price advantage appears to be a more persuasive cause of any injury which the domestic industry may have suffered.

U.S. producers' shipments, employment, and profitability

The declines experienced by the domestic industry during 1975 in the areas of shipments, employment, and profitability must be viewed within the context of the generally poor economic conditions existing at that time. In 1974 in response to a strong and increasing demand, shipments were at their highest level during the 1973-76 period. In 1975, however, total apparent U.S. consumption of above-ground metal-walled pools plummeted by 43 percent, and predictably, shipments, employment, and profitability followed a parallel course. As the economy took a healthier turn, U. S. producers' shipments rose from 91,000 pools in 1975 to 133,000 pools in 1976, an increase of 46 percent over the previous year.

Employment followed a similar upward course in 1976, and the figures for the first quarter of 1977, which are eight percent above the averages for the corresponding period in the previous year, clearly indicate continuing gains in this area. Advances also are present in U.S. producers' net operating profits for overall company operations. Following 1975's slide to \$4.6 million from \$8.5 million from the previous year, net operating profits soared to \$11.6 million in 1976 -- the highest figure in the 1972-76 period. The ratio of net operating profits to net sales for overall company operations similarly increased to

10 percent in 1976 from a low of 6.2 percent in 1975. Thus, in terms of sales, employment, and profitability, 1976 was a highly prosperous year for U.S. producers. These figures make clear that the depressed state of production affairs for the domestic industry resulted not from LTFV import sales, but rather because of the prevailing domestic market patterns during the period in question. One additional factor which has had a continuing adverse impact on domestic operations is weather conditions, particularly the acute water shortages currently being experienced in the West. This situation helps explain why, in spite of the strong post-recession surge in U. S. producers' overall operations, the above-ground swimming pool figures still lay behind their earlier record levels.

No likelihood of injury by reason of LTFV imports

The above-mentioned reasons which dictate a finding that a U.S. industry is not being injured by reason of LTFV sales of imported metal-walled above-ground swimming pools from Japan, also apply to the issue of likelihood of injury. The Commission has received assurances that any sales which possibly could be interpreted as having been at LTFV have been terminated and will not occur in the future. Further, U.S. imports from Japan are substantially declining, which is especially significant as noted earlier with regard to family pools. These imports dropped by almost 60 percent from January - March 1976 to the corresponding period in 1977, while the ratio of such imports to consumption declined more than 50 percent in that same period.

Conclusion

On the basis of the factors set forth above, we have determined that an industry in the United States is not being and is not likely to be injured by reason of the importation of metal-walled above-ground swimming pools from Japan which the Department of the Treasury has found to be or likely to be sold at LTFV.

INFORMATION OBTAINED IN THE INVESTIGATION

Introduction

On March 29, 1977, the United States International Trade Commission received advice from the Department of the Treasury that metal-walled above-ground swimming pools from Japan are being, or are likely to be, sold in the United States at less than fair value (LTFV) within the meaning of the Antidumping Act, 1921, as amended (19 U.S.C. 160(a)). Accordingly, on April 5, 1977, the Commission instituted investigation No. AA1921-165 under section 201(a) of said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States. By statute, the Commission must render its determination within 3 months of its receipt of advice from Treasury--in this case by June 29, 1977.

A public hearing in connection with the investigation was held in Washington, D.C., on May 12, 1977. Notice of the institution of the investigation and the hearing was duly given by posting copies of the notice at the Office of the Secretary, U.S. International Trade Commission, Washington, D.C., and at the Commission's office in New York City, and by publishing the original notice in the Federal Register of April 11, 1977 (42 F.R. 18906).

The Treasury Department instituted its investigation after receiving a properly filed complaint from Muskin Corp., of Colton, Calif., on April 21, 1976. Treasury's notice of its antidumping proceeding was published in the Federal Register of April 21, 1976 (41 F.R. 16667). The Secretary of the Treasury determined that it was inadvisable to take tentative action within the normal 6-month investigatory period. The period in this case was therefore extended to 8 months, and a notice of extension of investigatory period was published in the Federal Register of October 7, 1976 (41 F.R. 44196). A notice of tentative discontinuance of the antidumping investigation was published in the Federal Register of December 27, 1976 (41 F.R. 56248). However, information gathered and analyzed subsequent to the tentative discontinuance indicated that metal-walled above-ground swimming pools from Japan were being, or were likely to be, sold at less than fair value. Notices of determination of sales at less than fair value and withholding of appraisement were published in the Federal Register of April 1, 1977 (42 F.R. 17558 and 17560, respectively).

The Commission completed an investigation on similar articles on April 29, 1977. ^{1/} In that investigation, the Commission determined

^{1/} Certain Above-Ground Swimming Pools: Commission Memorandum Opinion in Support of the Commission Action, investigation No. 337-TA-25, USITC Publication 815, 1977.

that there was no violation of section 337 of the Tariff Act of 1930, as amended (19 U.S.C. 1337), in the importation into, or sales in, the United States of certain above-ground swimming pools because such unlicensed importation or sale did not infringe U.S. Letters Patent Nos. 3,268,917 (the '917 patent) and 3,274,621 (the '621 patent), 1/ and there was no policy of predatory pricing in the domestic sale of the subject imported above-ground swimming pools.

The Product

Description

Metal-walled above-ground swimming pools are recreational pool structures which can be taken apart and reassembled. Such pools differ from other types of swimming pools, such as inflatable children's pools and the larger in-ground and on-ground pools, in that they are both noninflatable and transportable. Above-ground swimming pools are generally categorized into two groups: splashers and family pools. Splashers, which are circular in shape, range from 6 feet to 12 feet in diameter and from 1 foot to 3 feet in depth. Family pools are normally circular or oval in shape; circular pools range in size from 12 feet to 30 feet in diameter, oval pools range from 14 feet by 8 feet to 41 feet by 18 feet. Most family pools are 4 feet in depth, although certain large models are up to 8 feet in depth at certain points. Above-ground pools are normally assembled by the customer.

Above-ground pools consist of three basic components: a vinyl liner, sheet-metal sidewalls, and a frame. The vinyl sheet for the liners is made either by calendaring, which is performed by firms other than pool manufacturers, or by extruding. In recent years the three largest domestic producers of above-ground pools have purchased extrusion equipment, and now they extrude their sheet requirements internally. The rolls of extruded vinyl sheet are cut to length by machine, and the sheets are sealed together by dielectric heating. Vinyl liners vary from .006 inch to .025 inch in thickness.

Sidewalls for above-ground swimming pools are made of sheet steel or aluminum. Pool manufacturers generally purchase the metal in coils after it has been painted or otherwise prepared by coil-coating firms. The coiled sheet is corrugated (aluminum is also frequently embossed) to increase its strength, and the material is then cut to desired lengths. The cut edges are hemmed, and holes required for later bolting are pierced.

1/ Chairman Minchew and Commissioner Moore found further that the '917 and the '621 patents were also invalid under 35 U.S.C. 102 and 103. Commissioners Parker, Leonard, Ablondi, and Bedell decided that it was unnecessary to consider the validity of the '917 and '621 patents in view of their finding that the patents had not been infringed in that case.

Frames for splashers consist of vertical members which slide into position between the pools' top and bottom rims. Frames for family pools are considerably more advanced and utilize interlocking horizontal and vertical support members. 1/ The processes for producing the vertical and horizontal frame members are stamping, roll forming, and, if aluminum is used, extruding. After forming, the pieces are normally painted, although some pool manufacturers produce the frame members from prepainted stock.

U.S. tariff treatment

Imported metal-walled above-ground swimming pools generally enter the United States under item 657.20 or item 774.60 of the Tariff Schedules of the United States (TSUS), depending on the material constituting the pools' chief value. Pools that are of chief value of metal are generally dutiable under item 657.20, while those that are of chief value of plastic are generally dutiable under item 774.60. The column 1 rates of duty for articles entered under items 657.20 and 774.60 are 9.5 and 8.5 percent ad valorem, respectively. These rates of duty have been in effect since January 1, 1972.

Nature and Extent of Sales at Less Than Fair Value

Treasury's investigation of U.S. imports of above-ground swimming pools from Japan covered the 6-month period extending from November 1, 1975, to April 30, 1976. Preliminary data developed by Treasury, which led to a tentative decision to discontinue the investigation on December 27, 1976, were based on price comparisons covering 80 percent of the value of U.S. sales by Asahi Chemical Industry Co., Ltd. of above-ground swimming pools during the period of Treasury's investigation. According to information developed by Treasury, Asahi supplied approximately 90 percent of the value of all Japanese exports of above-ground pools to the United States during the investigatory period. The Treasury investigation was limited to Asahi's sales in the United States. The early comparisons revealed dumping margins ranging from 1 percent to 27 percent on approximately 24 percent of the merchandise for which prices were compared, with a weighted average margin for all sales of 1.2 percent. However, subsequent to the tentative discontinuance, additional comparisons were made involving almost all of Asahi's sales not originally examined; furthermore, certain minor adjustments were made for inappropriate, earlier comparisons involving similar but not identical pools. The adjusted results showed margins ranging from less than 1 percent to 32 percent on approximately 47

1/ For a further discussion of frame construction for certain family pools, see Certain Above-Ground Swimming Pools: Commission Memorandum Opinion in Support of the Commission Action, investigation No. 337-TA-25, USITC Publication 815, 1977.

percent of the sales compared, with a weighted average margin of 3.5 percent. 1/ Margins were found on Asahi's exports of both splashers and family pools. Treasury determined the aggregate value of margins of sales at less than fair value during the period to be approximately * * *, none of which is collectable because Treasury did not withhold appraisement until April 1, 1977.

Asahi's sales for the home market during the investigatory period were small and were determined by Treasury to be insufficient for price comparison purposes. Consequently, the proper basis for fair-value comparisons was determined by Treasury to be between purchase price and third-country price. The third-country price was calculated on the basis of the f.o.b. price to unrelated Canadian purchasers. Adjustments were made in both markets for inland freight, shipping charges, packing, bank charges, interest expense, commissions, and merchandise. A deduction claimed by Asahi for certain freight and shipping charges was denied by Treasury as not being attributable to any additional costs, charges, and expenses incident to bringing the merchandise from the place of shipment in the country of exportation to the place of delivery to the United States.

In addition, Asahi's production-cost information was analyzed in response to the petitioner's claim that sales to the United States were at a price below the production cost. Treasury determined, however, that sales were made at a price above the production cost.

According to Treasury, during its 6-month period of investigation imports of above-ground swimming pools from Japan were valued at * * * million. Copies of certain Treasury memoranda relating to the determination of sales at less than fair value are attached in appendix A.

1/ The Department of the Treasury calculates percentage dumping margins as

$$\frac{\text{Fair value (in this instance, third-country price) - purchase price (or exporter's sales price)}}{\text{Purchase price (or exporter's sales price)}}$$

while the U.S. International Trade Commission calculates percentage dumping margins as

$$\frac{\text{Fair value (or third-country price)-purchase price (or exporter's sales price)}}{\text{Fair value (or third-country price)}}$$

On the basis of the ITC formula, the weighted average margin on above-ground pools from Japan is 3.4 percent. Data necessary for computing the range of margins of sales at LTFV using the ITC formula are not available.

The Domestic Industry

U.S. producers

Approximately eight U.S. firms manufacture metal-walled above-ground swimming pools. Three firms account for over 80 percent of total U.S. production of above-ground pools: Coleco Industries, Inc., of Hartford, Conn.; Muskin Corp., of Colton, Calif.; and Doughboy Recreational, Inc., of Cucamonga, Calif. Most of the remaining firms in the industry, unlike the aforementioned firms, sell primarily on a regional basis and subcontract out part or all of the manufacturing of the pool components.

Production of above-ground pools is seasonal, the great bulk of it occurring in the 6-month period from December to May. Consequently, most producers manufacture other seasonal items, such as Christmas merchandise (including inflatable toys, toy trucks, and artificial Christmas trees), during the remainder of the year. For the largest producers, sales of other products are generally small--i.e., less than one-third of total company sales. For most smaller producers, however, sales of above-ground swimming pools are significantly smaller than sales of other products.

Muskin Corp. is in the process of consolidating its two above-ground pool production facilities into one plant. Oceanic Leisure Corp., one of the smaller U.S. producers, is currently moving its pool production operations to smaller quarters. The major U.S. producers of metal-walled above-ground swimming pools and the locations of their headquarters and their plants producing such pools are as follows:

Company	Headquarters	Plant(s) producing above-ground swimming pools
Muskin Corp-----	Colton, Calif.	Wilkes-Barre, Pa.
Coleco Industries, Inc-----	Hartford, Conn.	Amsterdam and Gloversville, N.Y.
Doughboy Recreational, Inc----	Cucamonga, Calif.	Cucamonga, Calif.

The smaller U.S. producers are concentrated in the Northeastern States, principally in New York and New Jersey.

Channels of distribution

Usually, metal-walled above-ground swimming pools are sold directly by the manufacturer to specialized swimming pool dealers and major

chain stores. ^{1/} Splashers are also frequently marketed through toy and drug stores. Solicitations for orders for the forthcoming season normally begin in September, at which time manufacturers announce their new lines and set prices. Reorders to supplement earlier bulk purchases are normally received in June. All sales are f.o.b. point of shipment.

Mass merchandisers generally purchase above-ground pools in unitized containers (cartons containing a complete but unassembled pool) because they do not wish to devote space to the bulky assembled pools. The unitized container has the advantage of eliminating consumer concern over buying the correct size filter, since the filter and all other essential accessories are included. In contrast, the specialized pool dealers are in a better position to offer their customers different combinations of components, and thus receive their pool components and accessories in separate containers.

Virtually all domestic pool manufacturers provide their customers a form of easy financing that is written into the wholesale terms of sale. The terms allow the dealer to pay for pools in July or August, whereas actual delivery may have taken place up to 7 months earlier. Furthermore, in many instances pool producers do not force dealers to take delivery of pools previously ordered. Such circumstances normally arise when unfavorable weather conditions occur in the spring or early summer. The financing and flexibility in delivery provided by U.S. producers are not available for imports from Japan, which are purchased only through irrevocable letters of credit and require lengthy lead times.

Consideration of Injury or Likelihood Thereof

U.S. consumption

In addition to general economic conditions, the demand for above-ground swimming pools depends largely on weather conditions and the availability of water. In recent years, weather conditions have had little effect on total U.S. consumption of above-ground swimming pools, although fluctuations due to weather have occurred on a regional basis. The current water shortage in the Pacific Northwest and California reportedly has already affected 1977 pool sales in that area.

Industry sources indicate that up to 80 percent of U.S. sales of above-ground swimming pools are in the Northeastern and North Central States. This concentration is due to several factors, including the higher cost of in-ground pool construction in Northern States, where cold winter temperatures necessitate sturdier reinforcement.

^{1/} In 1975-76, 64 percent of the value of U.S. producers' shipments of metal-walled above-ground swimming pools were to swimming pool dealers.

Another factor is the high concentration of industrial workers, who are reportedly the principal purchasers of above-ground pools, in that area. Furthermore, families in warm sections of the country where swimming is popular almost year-round, such as California, are more apt to make the considerably larger investment required for in-ground pools. 1/

Apparent U.S. consumption of above-ground pools (splashers and family pools combined), as shown in the following table,

Metal-walled above-ground swimming pools: U.S. producers' shipments, exports, imports for consumption, and apparent consumption, 1973-76, January-March 1976, and January-March 1977

Period	U.S. producers' shipments	Exports	Imports	Apparent consumption	Ratio of imports to consumption
	: U.S. producers' shipments	: Exports	: Imports	: Apparent consumption	: (percent) of imports to consumption
Quantity (units)					
1973-----	201,480	7,398	***	***	***
1974-----	248,801	11,061	***	***	***
1975-----	90,513	4,043	***	***	***
1976-----	132,661	1,250	***	***	***
January-March:					
1976-----	50,487	468	***	***	***
1977-----	49,424	775	***	***	***
Value (1,000 dollars)					
1973-----	28,719	878	***	***	***
1974-----	38,797	2,014	***	***	***
1975-----	18,449	1,222	***	***	***
1976-----	32,680	381	***	***	***
January-March:					
1976-----	13,405	522	***	***	***
1977-----	12,397	243	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

1/ The above-ground family pools of the type found by Treasury to have been sold at less than fair value generally retail in the \$300-to-\$700 price range, whereas in-ground pools generally retail for \$4,500 or more.

declined from the 1973-74 average of * * * pools a year to * * * pools in 1975. U.S. producers of above-ground swimming pools have advised the Commission that the primary reason for the sharp decline in consumption in 1975 was the economic recession, which was accompanied by sharp price increases due to rising raw material costs. Apparent consumption increased in 1976 to * * * pools--still 16 percent below the 1973-74 average. Apparent U.S. consumption of above-ground pools amounted to * * * pools in January-March 1977 compared with * * * pools during the corresponding period of 1976.

The trend in apparent U.S. consumption of splashers, i.e., pools 10 feet or less in diameter, closely parallels the trend in consumption for all above-ground pools (see table 1, app. B). Apparent consumption declined from the 1973-74 average of * * * pools a year to * * * pools in 1975. In 1976, apparent consumption increased to * * * pools--16 percent below the 1973-74 average. In January-March 1977, apparent U.S. consumption amounted to * * * pools, as compared with * * * pools for the corresponding period of 1976.

Apparent U.S. consumption of pools over 10 feet but less than 15 feet in diameter, some of which are considered splashers, others of which are considered family pools, declined from * * * pools in 1973 to * * * pools in 1975, but then increased to * * * pools in 1976 (see table 2). Apparent consumption of these intermediate-sized pools amounted to * * * pools in January-March 1977, slightly above the * * * recorded during the corresponding period of 1976.

Family pools, i.e., pools having a diameter of 15 feet and over, account for the bulk of the value of apparent U.S. consumption of all above-ground swimming pools. Apparent U.S. consumption of family pools declined sharply from the 1973-74 average of 107,000 pools a year to * * * pools in 1975, the first year in which imported family pools entered the U.S. market (see table 3). Apparent consumption rebounded to * * * pools in 1976, but was still * * * percent lower than the 1973-74 average. Apparent consumption of family pools declined from * * * pools in January-March 1976 to * * * pools for the corresponding period of 1977.

U.S. production, shipments, and exports

U.S. production of above-ground swimming pools has followed a downward trend in recent years. Although increasing from an annual average of 190,000 pools during 1972 and 1973 to 233,000 pools in 1974, U.S. production dropped sharply to 115,000 pools in 1975. Production increased slightly in 1976 to 126,000 pools--an amount 46 percent less than the 1974 peak. In January-March 1977, U.S. production amounted to 45,000 pools, 12 percent below the 51,000 pools produced during the corresponding period of 1976 (see table 4).

The recent decline in U.S. production was evident in all pool size categories. Production of pools not over 10 feet in diameter increased dramatically from 12,000 pools in 1972 to 91,000 pools in 1974, but then declined to 11,000 pools in 1976. U.S. production of pools over 10 feet but less than 15 feet in diameter declined from a high of 52,000 pools in 1973 to 33,000 pools in 1975, and then increased slightly to 39,000 pools in 1976. U.S. production of family pools 15 feet and over in diameter and noncircular pools ^{1/} declined from an annual average of 119,000 pools during 1972-74 to 61,000 pools in 1975, but then rose to 75,000 pools in 1976.

U.S. producers' shipments followed a trend similar to that for production, increasing from 201,000 pools, valued at \$28.7 million, in 1973 to 249,000 pools, valued at \$38.8 million, in 1974. In 1975, shipments plummeted to 91,000 pools, valued at \$18.4 million, but then increased to 133,000 pools, valued at \$32.7 million, in 1976. ^{2/} Producers' shipments in January-March 1977 amounted to 49,000 pools, valued at \$12.4 million--slightly below the level of producers' shipments for the corresponding period of 1976 (see table 5).

The volume of producers' shipments in 1976 for each pool size category was substantially lower than the corresponding figures recorded for the peak year of 1974. The share of producers' shipments accounted for by aluminum-walled pools has increased in recent years. In 1976, such pools accounted for 25 percent of the total value of producers' shipments of above-ground pools, whereas in 1973 aluminum-walled pools accounted for only 10 percent of the total. There have been no LTFV imports of aluminum-walled pools.

U.S. exports of above-ground swimming pools, which accounted for less than 7 percent of producers' shipments in each of the years 1973-76, consist primarily of family pools. U.S. exports declined from a high of 11,000 pools, valued at \$2.0 million, in 1974 to 1,300 pools, valued at \$0.4 million, in 1976 (see table 6).

U.S. inventories

U.S. producers' inventories of metal-walled above-ground swimming pools declined without interruption during the period 1972-76 despite the sharp downturn in sales experienced by producers in recent years. U.S. producers' closing inventories of metal-walled above-ground swimming pools are shown in the following tabulation (in units):

^{1/} Noncircular pools, in almost all instances, have capacities equal to or greater than circular pools 15 feet in diameter.

^{2/} The bulk of U.S. producers' shipments in 1976 occurred during January-April of that year--a period concurrent with the last 4 months of the 6-month period in which Treasury found LTFV sales.

Period	Quantity
As of Dec. 31--	
1972-----	13,611
1973-----	9,349
1974-----	9,303
1975-----	8,745
1976-----	8,740
As of Mar. 31--	
1976-----	<u>1/</u> 14,151
1977-----	<u>1/</u> 13,971

1/ Closing inventories for March 31 are normally higher than yearend inventories because by March 31 more pools for the approaching season have been manufactured and warehoused for delivery later in the spring.

U.S. imports

U.S. imports of metal-walled above-ground swimming pools are principally from Japan, although Taiwan supplies a limited quantity of splashers. U.S. imports of above-ground pools declined from * * * pools in 1973 to * * * pools in 1975, but then increased to a high of * * * pools in 1976 (see table 7). U.S. imports declined from * * * pools in January-March 1976 to * * * pools for the corresponding period of 1977.

Until 1976, the bulk of U.S. imports traditionally consisted of splashers. Imports of splashers declined from * * * pools in 1973 to * * * pools in 1975, but then increased to * * * pools in 1976. U.S. splashers imports amounted to * * * pools in January-March 1977, slightly below the * * * splashers imported during the corresponding period of 1976.

U.S. imports of above-ground pools over 10 feet but less than 15 feet in diameter amounted to * * * pools in 1973, but * * * in 1974. Such imports * * * in 1975, however, and increased from * * * pools in that year to * * * pools in 1976. In January-March 1977, U.S. imports amounted to * * * pools, approximately the same level as imports for the corresponding period of 1976.

Imports of family pools first entered the U.S. market in late 1975, when such imports totaled less than * * * pools. U.S. imports of family pools increased significantly to * * * pools in 1976, however. Such imports amounted to about * * * pools in January-March 1977, well below the * * * recorded for the corresponding period of 1976.

There are no known U.S. imports of aluminum-walled above-ground swimming pools, whereas such pools normally account for between 10 and 15 percent of U.S. producers' shipments. Counsel for both importers and the domestic industry contend that aluminum-walled pools are directly competitive with steel-walled pools. 1/

U.S. imports of above-ground swimming pools from Asahi, like the domestic product, are sold directly to retailers. In recent years a substantial portion of Asahi's sales of such pools in the United States has been negotiated through Swim Sports, Inc., of North Hollywood, Calif. Swim Sports, the sole U.S. agent for Asahi, solicits sales on a commission basis and maintains no inventory. However, certain sales transactions with U.S. dealers have reportedly been conducted by an Asahi company official directly.

In addition, Asahi exports a significant quantity of above-ground pools to Irwin Toy, Ltd., of Toronto, Canada. Irwin Toy, as discussed later in this report, has marketed some of those pools in the United States.

1/ See the transcript of the public hearing, p. 59.

Employment

The average number of persons employed in the U.S. facilities producing metal-walled above-ground swimming pools increased irregularly from 1,354 in 1972 to 1,480 in 1976. During January-March 1977, such employees numbered 1,459, which was 108 above the number employed during January-March 1976. The following tabulation summarizes the average number of employees in the U.S. facilities that produce metal-walled above-ground swimming pools:

Item	1972	1973	1974	1975	1976	Jan.-Mar.—	
						1976	1977
All persons-----	1,354	1,408	1,443	1,301	1,480	1,351	1,459
Production and related workers engaged in the manufacture of:							
All products of the establishment(s)---	1,139	1,168	1,201	1,081	1,211	1,099	1,187
Metal-walled above-ground swimming pools-----	638	517	611	346	415	725	786

The average number of production and related workers engaged in the production of metal-walled above-ground swimming pools declined sharply from 611 in 1974 to 346 in 1975, reflecting the equally sharp drop in production. The 1975 decline was also partially attributable to a strike at one of Muskin's plants. It is believed, however, that no more than * * * workers were affected by the strike, which accounted for about * * * of the total decline in employment. In 1976, the number of production and related workers increased to 415, primarily because Coleco began to perform certain manufacturing operations in its own establishments which previously had been performed for the company by other firms. Coleco began performing its own corrugating of metal sidewalls, and it purchased an extruder enabling the company to make its own liners. The conclusion of the Muskin strike in late 1975 also contributed to the employment gains in 1976. The average number of production and related workers engaged in the production of above-ground pools increased from 725 in January-March 1976 to 786 for the corresponding period of 1977. The significantly higher level of employment reported in the January-March periods as compared with

average annual employment is attributable to the highly seasonal nature of swimming pool production.

The number of man-hours worked by production and related workers engaged in the production of metal-walled above-ground pools closely parallels the trend in employment, declining sharply in 1975 but increasing in 1976 and January-March 1977. The following tabulation shows man-hours reported in the production of metal-walled above-ground swimming pools, man-hours reported for other products, and man-hours reported for all products for the plants in which above-ground swimming pools are made (in thousands of man-hours):

Period	Total	Metal-walled above-ground swimming pools	All other products
1972-----	2,239	1,318	921
1973-----	2,382	1,095	1,287
1974-----	2,451	1,272	1,179
1975-----	2,157	687	1,470
1976-----	2,458	884	1,574
January-March--			
1976-----	562	375	187
1977-----	616	405	205

As shown above, the number of man-hours devoted to the production of other products manufactured in the establishments where above-ground swimming pools are made increased from 1.2 million man-hours in 1974 to 1.6 million man-hours in 1976, reflecting the efforts of the major producers to compensate for sagging pool sales by increasing their production of other articles.

Profit-and-loss experience of domestic producers

Profit-and-loss data for 4 U.S. producers of metal-walled above-ground swimming pools, which account for over 85 percent of total U.S. producers' shipments, are summarized in the following table and detailed in table 8.

Profit-and-loss experience of 4 U.S. producers on their overall
company operations, accounting years 1972-76

(In thousands of dollars)

Item	1972	1973	1974	1975	1976
Net sales-----	66,815	75,618	94,547	73,973	116,485
Cost of goods sold-----	44,185	55,871	70,309	53,489	80,387
Gross profit-----	20,630	19,747	24,238	20,485	36,097
General, selling, and administrative expenses-----	12,441	13,683	15,720	15,894	24,493
Net operating profit----	8,189	6,064	8,518	4,591	11,604
Other expense, net-----	454	427	1,761	2,127	1,123
Net profit before taxes-----	7,063	5,080	4,774	1,040	8,815
Ratio (percent) of net operating profit to net sales-----	12.3	8.0	9.0	6.2	10.0

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Net sales for overall company operations increased from \$66.8 million in 1972 to \$94.5 million in 1974, dipped to \$74.0 million in 1975, and then increased to \$116.5 million in 1976. The ratio of net operating profit to net sales declined without interruption from 12.3 percent in 1972 to 6.2 percent in 1975. In 1976, however, the ratio jumped to 10.0 percent, when net operating profits were at their highest level for the 1972-76 period.

Profit-and-loss data concerning operations on above-ground pools only are available from 3 U.S. producers, which account for over 80 percent of total U.S. producers' shipments. As shown in the following table (and detailed in table 9), net sales of above-ground pools increased from the 1972-73 average of \$29.4 million a year to \$41.0 million in 1974. Net sales declined to a low of \$22.7 million in 1975, but then increased to \$33.5 million in 1976. The ratio of net operating profit to net sales declined from a high of 13.7 percent in 1974 to 11.8 percent in 1975. The ratio of net operating profit to net sales continued to drop to 7.5 percent in 1976, despite a 47 percent increase in net sales over the 1975 level. The cost of goods sold, however, increased by an even higher margin--55 percent.

Profit and loss experience of U.S. producers on their operations
on above-ground pools only, accounting years 1972-76

(In thousands of dollars)

Item	1972	1973	1974	1975	1976
Net sales-----	30,259	28,632	41,042	22,726	33,514
Cost of goods sold-----	21,628	21,136	28,989	15,706	24,408
Gross profit-----	8,631	7,496	12,053	7,020	9,107
General, selling, and administrative expenses-----	5,845	5,096	6,442	4,345	6,588
Net operating profit----	2,786	2,300	5,611	2,675	2,519
Other income or (expense), net-----	(82)	156	185	(155)	(117)
Net profit before taxes-----	2,023	1,460	3,952	1,329	1,106
Ratio (percent) of net operating profit to net sales-----	9.2	8.0	13.7	11.8	7.5

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

The Japanese industry

There are only two known Japanese manufacturers of above-ground swimming pools which export such articles to the United States: Asahi Chemical Industry Co., Ltd., and Seiwa Pool Co., Ltd. In addition to these firms, however, there are known to be several Japanese manufacturers involved in the exportation of sheet metal to Taiwan for use in the manufacture of above-ground pools, some of which are exported from Taiwan to the United States.

Consideration of the Causal Relationship Between
Alleged Injury and LTFV Sales

Market penetration of LTFV sales

The Department of the Treasury found LTFV margins on 47 percent of Asahi's sales to the United States during its period of investigation, November 1, 1975-April 30, 1976. Asahi's sales during this period amounted to * * *, which, according to Treasury estimates, accounted for 90 percent of total Japanese exports to the United States. The remaining exports were accounted for by Seiwa, whose sales were not investigated by Treasury. Data available to the Commission, however, indicate that there were large U.S. imports from Seiwa in 1976, amounting to * * *, and that the bulk of such imports were during January-March 1976-15

U.S. imports from Asahi Chemical Industry Co., Ltd.—As shown in the following table, the share of apparent U.S. consumption of above-ground pools supplied by Asahi declined from * * * percent in 1973 to less than * * * percent in 1975, when Asahi encountered severe difficulties in obtaining needed quantities of steel. In 1976, however, imports from Asahi jumped to their highest level for the 1973-76 period and accounted for * * * percent of apparent U.S. consumption. The ratio of imports from Asahi to U.S. consumption for January-March 1977 was * * * percent--* * * percent lower than that for the corresponding period of 1976.

The ratio of imports from Asahi to apparent U.S. consumption varied considerably according to pool sizes. 1/ The share of U.S. consumption of splashers accounted for by imports from Asahi declined from the 1973-74 average of * * * percent to less than 1 percent for 1975, but then increased to * * * percent in 1976 (see table 10). The ratio of imports of Asahi splashers to consumption declined slightly from * * * percent in January-March 1976 to * * * percent for the corresponding period for 1977.

U.S. imports from Asahi of pools over 10 feet but less than 15 feet increased their share of apparent U.S. consumption from the 1973-75 average of less than * * * percent to * * * percent in 1976 (see table 11). The ratio of such imports to consumption for January-March 1977 was * * * percent--* * * percent lower than that for the corresponding period of 1976.

Metal-walled above-ground swimming pools: Apparent U.S. consumption, U.S. imports from Asahi Chemical Industry Co., Ltd., shipments of Asahi pools by Irwin Toy, Ltd., to the United States, and U.S. imports from Japan, 1973-76, January-March 1976, and January-March 1977

Period	Apparent U.S. consumption (1)	U.S. imports from Japan (2)	Shipments of Asahi pools by Irwin Toy, Ltd., to the United States (3)	U.S. imports from Japan (4)	Ratio of (3) to (1)	Ratio of (4) to (1)
	Units	Units	Units	Percent	Per-cent	Per-cent
1973-----	***	***	0	***	0	***
1974-----	***	***	0	***	0	***
1975-----	***	***	0	***	***	***
1976-----	***	***	***	***	***	***
Jan.-Mar.--						
1976-----	***	***	0	***	0	***
1977-----	***	***	***	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Asahi shipments of family pools first entered the United States in late 1975, when they accounted for * * * percent of apparent U.S. consumption; in 1976 the ratio of such imports to consumption increased to * * * percent (see table 12). In January-March 1977, the import penetration ratio for such pools was * * * percent, considerably below the * * * percent recorded for the corresponding period of 1976. It is important to note that producers' shipments of family pools have accounted for approximately 90 percent of the total value of U.S. producers' shipments of above-ground pools in recent years. 1/

In 1976 and January-March 1977, Irwin Toy, Ltd., of Toronto, Canada, shipped a small quantity of above-ground pools manufactured in Japan by Asahi to the United States. The ratio of such shipments to apparent U.S. consumption was most pronounced for family pools. In 1976, Irwin Toy's shipments of Asahi-manufactured family pools to the United States accounted for * * * percent of apparent consumption (see table 12).

Total U.S. imports from Japan.—As shown in the preceding table, the share of apparent U.S. consumption of above-ground pools supplied by total imports from Japan, which include shipments by both Asahi and Seiwa, increased from * * * percent in 1974 to * * * percent in 1975, and then declined slightly to * * * percent in 1976. The ratio of imports to consumption for January-March 1977 was * * * percent, the same ratio as that for the corresponding period of 1976.

In the late 1960's, U.S. imports of splashers from Japan, most of which are supplied by Seiwa, made significant inroads into the U.S. market and have enjoyed a dominant position since that time. The ratio of U.S. imports of splashers from Japan to apparent U.S. consumption increased from the 1973-74 average of * * * percent to * * * percent in 1975 and 1976 (see table 10). The ratio for January-March 1977 was * * * percent, 1 percent higher than that for the corresponding period of 1976.

U.S. imports of intermediate-sized pools, i.e., pools over 10 feet but less than 15 feet in diameter, have been small in relation to imports of pools of other sizes. The share of apparent U.S. consumption supplied by such imports from Japan increased from the 1973-75 average of * * * percent to * * * percent in 1976 (see table 11). The ratio for January-March 1977 was * * * percent, slightly lower than the * * * percent recorded for the corresponding period of 1976.

1/ During the Commission's public hearing, counsel for the domestic industry indicated that the domestic industry is primarily concerned with LTFV imports of family pools (see the transcript, p. 46).

U.S. imports of family pools, all of which are supplied by Asahi, first entered the United States in 1975. The ratio of such imports to apparent U.S. consumption increased from * * * percent in 1975 to * * * percent in 1976; adding Irwin Toy's shipments, the ratio for 1976 was * * * percent (see table 12). The import penetration ratio for family pools declined from * * * percent in January-March 1976 to * * * percent for the corresponding period of 1977.

Evidence of sales lost by domestic producers to LTFV imports from Japan

Four U.S. producers of metal-walled above-ground swimming pools presented specific information to the Commission on sales lost to LTFV imports of above-ground pools from Japan. Each claimed substantial losses of customers or a percentage of sales lost to established customers or both. A total of 43 U.S. purchasers of above-ground swimming pools were named as having terminated or reduced purchases of U.S.-made pools as a result of the LTFV imports. The responding producers claimed lost sales of \$2.3 million in 1975 and \$4.4 million in 1976, although an official of one reporting firm indicated that a minor portion of the lost sales listed by his firm could have been attributable to sales lost to other domestic producers.

In exploring the claims of lost sales by U.S. producers, the Commission staff contacted officials of 6 customers, each of which was listed by at least two producers as having reduced purchases of domestic pools as a direct result of LTFV imports. In each instance, price considerations were cited as the determinative factor in the customer's decision to import pools from Japan. Two customers claimed that their supply requirements for family pools were currently being met by purchasing only the expensive, high-quality aluminum-walled pools from domestic producers, with orders for the low-priced, steel-walled pools going to Asahi.

In questionnaires sent to U.S. purchasers of above-ground swimming pools, the firms were asked to report separately purchases of U.S.-made and purchases of Japanese-made pools. Analyses of the data offer direct support for the U.S. producers' claims of lost sales.

Fifteen purchasers reported data showing a significant displacement of purchases of U.S.-made pools by imports of Japanese pools during 1975, 1976, and January-March 1977. In most instances, purchases from U.S. producers declined in both absolute and relative terms from the 1973-74 level. The increase in imports by the 15 purchasers was almost evenly distributed between splashers and family pools. In only two instances did purchasers report decreases in their imports of pools

from Japan and increases in purchases from domestic suppliers. In both cases the displacements, which were small in terms of value, involved only splashers. The following table depicts the increase in the ratio of imports of above-ground pools from Japan to certain U.S. purchasers' total above-ground pool purchases.

Ratio of imports from Japan to the total value of above-ground pool purchases, by selected U.S. purchasers, 1973-74 and 1975-76

(In percent)

U.S. purchasers	1973-74	1975-76
***-----	<u>1/</u>	49.7
***-----	<u>1/</u>	16.0
***-----	<u>1/</u>	27.1
***-----	0.9	34.0
***-----	1.2	7.4
***-----	<u>1/</u>	8.8
***-----	<u>1/</u>	5.0
***-----	<u>1/</u>	63.0
***-----	<u>1/</u>	2.0
***-----	2.8	15.7
***-----	<u>1/</u>	99.2
***-----	<u>1/</u>	34.5
***-----	<u>1/</u>	7.1
***-----	<u>1/</u>	100.0
***-----	<u>1/</u>	100.0

1/ Did not import above-ground pools from Japan during the specified period.

Prices

The Commission sent questionnaires requesting certain price data to purchasers of metal-walled above-ground swimming pools. As indicated earlier, most purchasers of such pools are either specialized swimming pool dealers or large chain stores. Both domestic and foreign above-ground pool manufacturers sell directly to these firms. The respondents were asked to supply the lowest net delivered price paid by them for pools of specified sizes made in the United States and made in Japan. 1/

1/ While price data were requested on a 6-month basis, it was discovered that with a few minor exceptions above-ground pool purchasers generally paid the same price for a given model throughout the calendar year. Hence, all prices discussed herein, unless otherwise noted, are prices which were in effect throughout the year for which they are reported.

As shown in the following table, domestic prices increased without interruption during 1972-76 and January-March 1977. Domestic prices for family pools, i.e., pool sizes 18 feet by 48 inches and 24 feet by 48 inches, rose most sharply in 1975 owing to rapidly escalating raw material costs. It was during the latter part of 1975 and the early part of 1976 that imports of family pools first entered the United States. The great bulk of U.S. imports from Japan of these pools were priced from 28 to 41 percent below the average price of U.S.-made pools during the 1975-76 period.

Price data available for splashers, i.e., pool sizes 8 feet by 20 inches and 10 feet by 24 inches, generally showed a narrower difference between domestic and import prices. Officials of two large U.S. producers have contended that their firms take a loss on every splasher sold and that they continue to carry splashers in their product line only because customers frequently desire one-stop service. These officials contend that, since profit is not an overwhelming consideration with respect to these limited sales, it is to their best advantage to price such pools so as to be competitive with the Japanese splashers. While the price advantage of Japanese-made above-ground pools has declined since 1973 with regard to family pools, the Japanese price advantage for splashers has continued to expand.

The domestic industry maintains, and counsel for Asahi agrees, that, while the Japanese price advantage appears to be 20 to 25 percent, the practical price advantage is much less because of the numerous services provided by domestic manufacturers to their customers. ¹/ The industry claims that when domestic prices are adjusted accordingly, the Japanese price advantage shrinks to between 5 and 8 percent; consequently, the 3.5 percent average weighted dumping margin found by Treasury is a significant price factor.

¹/ See the transcript of the public hearing, pp. 16, 22, 25, and 48.

Metal-walled above-ground swimming pools: Ranges and arithmetic averages of lowest net purchase prices paid by purchasers, by sources, and by pool sizes, 1973-76, and January-March 1977

Item and period	U.S.-made swimming pools		Japanese-made swimming pools		Ratio of average price of Japanese-made to U.S.-made pools
	Range	Average price	Range	Average price	
Pools 8' x 20":					
1973-----	\$7.18-\$9.63	\$8.61	\$7.76-\$9.78	\$8.38	
1974-----	9.60-13.45	11.15	10.00	10.00	
1975-----	<u>1/</u>	<u>1/</u>	13.22-16.29	14.84	<u>1/</u>
1976-----	12.95-14.25	13.42	9.10-13.34	11.96	
1977 (January-March)--	14.20	14.20	10.10-15.00	12.55	
Pools 10' x 24":					
1973-----	13.75-17.39	15.65	15.60	15.60	
1974-----	15.43-18.00	16.64	15.80	15.80	
1975-----	<u>1/</u>	<u>1/</u>	21.81-25.76	23.53	<u>1/</u>
1976-----	22.37-22.50	22.43	15.00-21.93	19.50	
1977 (January-March)--	25.84	25.84	15.45-24.48	19.75	
Pools 18' x 48":					
1973-----	101.90-199.00	163.79	<u>2/</u>	<u>2/</u>	<u>2/</u>
1974-----	110.00-290.00	185.10	<u>2/</u>	<u>2/</u>	<u>2/</u>
1975-----	186.40-267.25	239.92	120.00-157.60	135.80	
1976-----	225.00-340.00	264.88	146.00-231.44	188.50	
1977 (January-March)--	227.00-312.00	272.02	182.25-234.00	205.57	
Pools 24' x 48":					
1973-----	173.35-320.00	240.82	<u>2/</u>	<u>2/</u>	<u>2/</u>
1974-----	150.00-297.76	268.33	<u>2/</u>	<u>2/</u>	<u>2/</u>
1975-----	227.90-436.00	336.81	223.29-229.00	226.14	
1976-----	295.00-454.00	355.53	216.44-323.22	256.15	
1977 (January-March)--	306.00-417.00	355.68	229.70-316.61	271.16	

1/ Not available.

2/ There were no imports of metal-walled above-ground swimming pools over 15 feet in diameter from Japan during 1973-74.

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission by 23 purchasers of metal-walled above-ground swimming pools.

APPENDIX A:

TREASURY MEMORANDA RELATING TO
THE DETERMINATION OF SALES AT LTFV



A-23

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

ASSISTANT SECRETARY

APP-2-04-0:D:T MC jr

MAR 28 1977

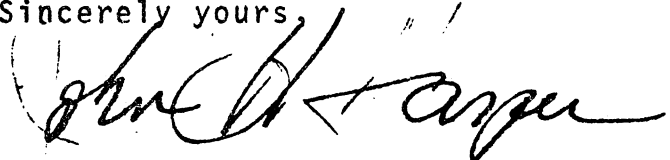
Dear Mr. Chairman:

In accordance with section 201(a) of the Antidumping Act, 1921, as amended, you are hereby advised that steel-walled above-ground swimming pools from Japan are being, or likely to be, sold at less than fair value within the meaning of the Act.

The United States Customs Service will make the files on sales or likelihood of sales at less than fair value of the steel-walled above-ground swimming pools subject to this determination available to the International Trade Commission as soon as possible. These files are being furnished for the Commission's use in connection with its investigation as to whether an industry is being, or is likely to be injured, or is prevented from being established, by reason of the importation of this merchandise into the United States.

Since some of the data in this file is regarded by the U.S. Customs Service to be of a confidential nature, it is requested that the United States International Trade Commission consider all information therein contained for the official use of the Trade Commission only, and not to be disclosed to others without prior clearance with the U.S. Treasury Department.

Sincerely yours,


Arthur H. Carter
Assistant Secretary
of the Treasury

The Honorable
Daniel Minchew, Chairman
United States International Trade Commission
Washington, D.C. 20436

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APPENDIX B:
STATISTICAL TABLES

Table 1.-- Metal-walled above-ground swimming pools having a diameter of 10 feet or less: U.S. producers' shipments, exports, imports for consumption, and apparent consumption, 1973-76, January-March 1976, and January-March 1977

Period	U.S. producers' shipments	Exports	Imports	Apparent consumption	Ratio (percent) of imports to consumption
Quantity (units)					
1973-----	38,611	248	***	***	***
1974-----	78,998	346	***	***	***
1975-----	16,282	0	***	***	***
1976-----	18,719	0	***	***	***
January-March--					
1976-----	4,294	0	***	***	***
1977-----	3,081	0	***	***	***
Value (1,000 dollars)					
1973-----	431	3	***	***	***
1974-----	949	5	***	***	***
1975-----	563	-	***	***	***
1976-----	374	-	***	***	***
January-March--					
1976-----	87	-	***	***	***
1977-----	71	-	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 2.-- Metal-walled above-ground swimming pools having a diameter of over 10 feet but less than 15 feet: U.S. producers' shipments, exports, imports for consumption, and apparent consumption, 1973-76, January-March 1976, and January-March 1977

Period	U.S. producers' shipments	Exports	Imports	Apparent consumption	Ratio of imports to consumption
	(thousands of units)	(thousands of units)	(thousands of units)	(thousands of units)	(percent)
Quantity (units)					
1973-----	54,620	603	***	***	***
1974-----	47,066	804	***	***	***
1975-----	28,617	311	***	***	***
1976-----	38,352	338	***	***	***
January-March--					
1976-----	14,152	36	***	***	***
1977-----	15,392	229	***	***	***
Value (1,000 dollars)					
1973-----	3,202	33	***	***	***
1974-----	2,909	36	***	***	***
1975-----	1,559	30	***	***	***
1976-----	2,175	27	***	***	***
January-March--					
1976-----	901	2	***	***	***
1977-----	895	17	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 3. -- Metal-walled above-ground swimming pools having a diameter 15 feet and over, and noncircular pools: U.S. producers' shipments, exports, imports for consumption, and apparent consumption, 1973-76, January-March 1976, and January-March 1977

Period	U.S.	Exports	Imports	Apparent	Ratio
	producers' shipments			consumption	(percent) of imports to consumption
Quantity (units)					
1973-----	108,249	6,547	0	101,702	-
1974-----	122,737	9,911	0	112,826	-
1975-----	45,615	3,732	***	***	***
1976-----	75,590	912	***	***	***
January-March--					
1976-----	32,041	432	***	***	***
1977-----	30,951	546	***	***	***
Value (1,000 dollars)					
1973-----	25,086	842	-	24,244	-
1974-----	34,939	1,973	-	32,966	-
1975-----	16,327	1,192	***	***	***
1976-----	30,131	520	***	***	***
January-March--					
1976-----	12,417	520	***	***	***
1977-----	11,431	226	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 4.--Metal-walled above-ground swimming pools: U.S. production, by types, 1972-76, January-March 1976, and January-March 1977

Item	(In units)							
	1972	1973	1974	1975	1976	January-March--		
						1976	1977	
ircular:								
Not over 10' in diameter:								
Steel-walled-----	12,128	34,909	91,053	20,921	11,235	3,349	3,9	
Aluminum-walled-----	0	0	0	0	0	0	0	
Total-----	12,128	34,909	91,053	20,921	11,235	3,349	3,9	
Over 10' but not less than 15' in diameter:								
Steel-walled-----	47,762	52,080	45,912	32,887	38,400	16,688	12,5	
Aluminum-walled-----	0	0	0	0	853	287	1,0	
Total-----	47,762	52,080	45,912	32,887	39,253	16,975	13,6	
15' and over in diameter:								
Steel-walled-----	86,581	66,410	84,033	38,736	47,066	18,542	17,	
Aluminum-walled-----	1,753	3,917	12,174	4,463	12,431	6,447	4,	
Total-----	88,334	70,327	96,207	43,199	59,497	24,989	22,	
ncircular:								
Steel-walled-----	42,844	27,837	22,494	16,467	13,114	4,454	3,	
Aluminum-walled-----	685	2,659	5,462	1,630	2,453	1,393	1,	
Total-----	43,529	30,496	27,956	18,097	15,567	5,847	4,	
Grand total-----	191,753	187,812	233,172	115,104	125,552	51,160	45,	

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 5.--Metal-walled above ground swimming pools: U.S. producers' shipments, by types, 1973-76, January-March 1976, and January-March 1977

Item	1973	1974	1975	1976	January-March--	
					1976	1977
	Quantity (units)					
Circular:						
Not over 10' in diameter:						
Steel-walled-----	38,611	78,998	16,282	18,719	4,294	3,081
Aluminum-walled-----	-	-	-	-	-	-
Total-----	38,611	78,998	16,282	18,719	4,294	3,081
Over 10' but less than 15' in diameter:						
Steel-walled-----	54,620	47,066	28,617	37,008	13,546	15,039
Aluminum-walled-----	-	-	-	1,344	606	353
Total-----	54,620	47,066	28,617	38,352	14,152	15,392
15' and over in diameter:						
Steel-walled-----	79,202	85,007	31,663	47,136	19,810	21,386
Aluminum-walled-----	5,496	10,318	3,694	11,726	5,536	4,400
Total-----	84,698	95,325	35,357	58,862	25,346	25,786
Noncircular:						
Steel-walled-----	21,105	21,565	8,798	14,243	5,508	4,501
Aluminum-walled-----	2,446	5,847	1,459	2,485	1,187	664
Total-----	23,551	27,412	10,257	16,728	6,695	5,165
Grand total-----	201,480	248,801	90,513	132,661	50,487	49,424
	Value (1,000 dollars)					
Circular:						
Not over 10' in diameter:						
Steel-walled-----	431	949	563	374	87	71
Aluminum-walled-----	-	-	-	-	-	-
Total-----	431	949	563	374	87	71
Over 10' but less than 15' in diameter:						
Steel-walled-----	3,202	2,909	1,559	2,065	846	861
Aluminum-walled-----	-	-	-	110	55	34
Total-----	3,202	2,909	1,559	2,175	901	895
15' and over in diameter:						
Steel-walled-----	15,750	19,495	8,975	13,963	5,903	6,121
Aluminum-walled-----	1,890	2,422	1,618	5,693	2,273	1,755
Total-----	17,640	21,917	10,593	19,656	8,176	7,876
Noncircular:						
Steel-walled-----	6,429	9,145	4,699	7,951	2,971	2,762
Aluminum-walled-----	1,017	3,877	1,035	2,524	1,270	793
Total-----	7,446	13,022	5,734	10,475	4,241	3,555
Grand total-----	28,719	38,797	18,449	32,680	13,405	12,397

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 6.--Metal-walled above-ground swimming pools: U.S. exports, by types, 1972-76, January-March 1976, and January-March 1977

Item	1972	1973	1974	1975	1976	January-March--	
						1976	1977
Quantity (units)							
Circular:							
Not over 10' in diameter:							
Steel-walled-----	236	248	346	0	0	0	
Aluminum-walled-----	-	-	-	-	-	-	
Total-----	236	248	346	0	0	0	
Over 10' but less than 15' in diameter:							
Steel-walled-----	166	603	804	311	337	36	22
Aluminum-walled-----	0	0	0	0	1	0	
Total-----	166	603	804	311	338	36	22
15' and over in diameter:							
Steel-walled-----	1,245	4,999	7,819	2,662	528	273	20
Aluminum-walled-----	102	149	291	49	48	1	
Total-----	1,347	5,148	8,110	2,711	576	274	20
Noncircular:							
Steel-walled-----	1,836	1,328	1,629	978	300	151	1
Aluminum-walled-----	112	71	172	43	36	7	
Total-----	1,948	1,399	1,801	1,021	336	158	1
Grand total-----	3,697	7,398	11,061	4,043	1,250	468	7
Value (1,000 dollars)							
Circular:							
Not over 10' in diameter:							
Steel-walled-----	2	3	5	-	-	-	
Aluminum-walled-----	-	-	-	-	-	-	
Total-----	2	3	5	-	-	-	
Over 10' but less than 15' in diameter:							
Steel-walled-----	6	33	36	30	26	2	
Aluminum-walled-----	-	-	-	-	1	-	
Total-----	6	33	36	30	27	2	
15' and over in diameter:							
Steel-walled-----	892	578	1,337	684	163	450	
Aluminum-walled-----	26	38	72	29	20	-	
Total-----	918	616	1,409	713	183	450	
Noncircular:							
Steel-walled-----	332	200	480	455	141	65	
Aluminum-walled-----	46	26	84	24	30	5	
Total-----	377	226	564	479	171	70	
Grand total-----	1,303	878	2,014	1,222	381	522	

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 7.--Metal-walled above-ground swimming pools: U.S. imports for consumption, by size categories, 1973-76, January-March 1976, and January-March 1977

Item	1973	1974	1975	1976	January-March--	
					1976	1977
Quantity (units)						
Not over 10 feet in diameter-----	***	***	***	***	***	***
Over 10 feet but less than 15 feet in diameter-----	***	***	***	***	***	***
15 feet and over in diameter, and noncircular pools-----	0	0	***	***	***	***
Value (1,000 dollars)						
Not over 10 feet in diameter-----	***	***	***	***	***	***
Over 10 feet but less than 15 feet in diameter-----	***	***	***	***	***	***
15 feet and over in diameter, and noncircular pools-----	-	-	***	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 8.--Profit-and-loss experience of 4 domestic producers of metal-walled above-ground swimming pools on their overall establishment operations, 1972-76

Year and company	Net sales	Cost of goods sold	Gross profit	General, selling, and administrative expenses	Net operating profit	Other income or (expense) net	Net profit or (loss) before taxes	Ratio of net operating profit to net sales
								Percent
1972								
Coleco Industries, Inc.	***	***	***	***	***	***	***	***
Muskin Corp	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc.	***	***	***	***	***	***	***	***
Esther Williams Swimming Pools	***	***	***	***	***	***	***	***
Total	66,814,541	46,184,947	20,629,594	12,440,750	8,188,844	(453,986)	7,063,222	12.3
1973								
Coleco Industries, Inc.	***	***	***	***	***	***	***	***
Muskin Corp	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc.	***	***	***	***	***	***	***	***
Esther Williams Swimming Pools	***	***	***	***	***	***	***	***
Total	75,617,665	55,870,863	19,746,802	13,683,274	6,063,528	(426,678)	5,080,448	8.0
1974								
Coleco Industries, Inc.	***	***	***	***	***	***	***	***
Muskin Corp	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc.	***	***	***	***	***	***	***	***
Esther Williams Swimming Pools	***	***	***	***	***	***	***	***
Total	94,547,233	70,309,353	24,237,880	15,719,624	8,518,303	(1,761,136)	4,774,231	9.0
1975								
Coleco Industries, Inc.	***	***	***	***	***	***	***	***
Muskin Corp	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc.	***	***	***	***	***	***	***	***
Esther Williams Swimming Pools	***	***	***	***	***	***	***	***
Total	73,973,403	53,488,648	20,484,755	15,893,720	4,591,035	(2,126,833)	1,039,562	6.2
1976								
Coleco Industries, Inc.	***	***	***	***	***	***	***	***
Muskin Corp	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc.	***	***	***	***	***	***	***	***
Esther Williams Swimming Pools	***	***	***	***	***	***	***	***
Total	116,484,594	80,387,378	36,097,216	24,493,395	11,603,821	(1,123,214)	8,814,775	10.0

Data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 9.---Profit-and-loss experience of 3 domestic producers of metal-walled above-ground swimming pools on their above-ground pool operations only, 1972-76

Year and company	Net sales	Cost of goods sold	Gross profit	General, selling, and administrative expenses	Net operating profit	Other income or (expense), net	Net profit or (loss) before taxes	Ratio of net operating profit to net sales
								Percent
<u>1972</u>								
Coleco Industries, Inc-----	***	***	***	***	***	***	***	***
Muskin Corp-----	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc-----	***	***	***	***	***	***	***	***
Total-----	30,259,343	21,628,234	8,631,109	5,845,469	2,785,640	(81,534)	2,023,174	9.2
<u>1973</u>								
Coleco Industries, Inc-----	***	***	***	***	***	***	***	***
Muskin Corp-----	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc-----	***	***	***	***	***	***	***	***
Total-----	28,631,737	21,136,041	7,495,696	5,095,725	2,399,971	156,049	1,459,922	8.4
<u>1974</u>								
Coleco Industries, Inc-----	***	***	***	***	***	***	***	***
Muskin Corp-----	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc-----	***	***	***	***	***	***	***	***
Total-----	41,041,931	28,988,590	12,053,341	6,442,293	5,611,048	184,822	3,952,226	13.7
<u>1975</u>								
Coleco Industries, Inc-----	***	***	***	***	***	***	***	***
Muskin Corp-----	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc-----	***	***	***	***	***	***	***	***
Total-----	22,726,058	15,705,886	7,020,172	4,344,785	2,675,287	(155,071)	1,328,892	11.8
<u>1976</u>								
Coleco Industries, Inc-----	***	***	***	***	***	***	***	***
Muskin Corp-----	***	***	***	***	***	***	***	***
Doughboy Recreational, Inc-----	***	***	***	***	***	***	***	***
Total-----	33,514,384	24,407,874	9,106,510	6,587,840	2,518,670	(116,877)	1,105,711	7.5

Table 10.--Metal-walled above-ground swimming pools having a diameter of 10 feet or less: Apparent U.S. consumption, U.S. imports from Asahi Chemical Industry Co., Ltd., and U.S. imports from Japan, 1973-76, January-March 1976, and January-March 1977

Period	Apparent:	U.S.:	U.S.:		
	U.S. consumption:	imports from Asahi:	imports from Japan:	Ratio of (2) to (1):	Ratio of (3) to (1):
	(1)	(2)	(3)		
	Units	Units	Units	Percent	Percent
1973-----	***	***	***	***	***
1974-----	***	***	***	***	***
1975-----	***	***	***	***	***
1976-----	***	***	***	***	***
Jan.-Mar.--					
1976-----	***	***	***	***	***
1977-----	***	***	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 11.--Metal-walled above-ground swimming pools having a diameter of over 10 feet but less than 15 feet: Apparent U.S. consumption, U.S. imports from Asahi Chemical Industry Co., Ltd., shipments of Asahi pools by Irwin Toy, Ltd., to the United States, and U.S. imports from Japan, 1973-76, January-March 1976, and January-March 1977

Period	Apparent U.S. consumption (1)	U.S. imports from Asahi (2)	Shipments of Asahi pools by Irwin Toy, Ltd., to the United States (3)	U.S. imports from Japan (4)	Ratio of (2) to (1)	Ratio of (3) to (1)	Ratio of (4) to (1)
	Units	Units	Units	Units	Percent	Percent	Percent
1973-----	***	***	0	***	***	-	***
1974-----	***	***	0	***	***	-	***
1975-----	***	***	0	***	***	-	***
1976-----	***	***	***	***	***	***	***
Jan.-Mar.--							
1976-----	***	***	0	***	***	-	***
1977-----	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Table 12.--Metal-walled above-ground swimming pools having a diameter 15 feet and over, and noncircular pools: Apparent U.S. consumption, U.S. imports from Asahi Chemical Industry Co., Ltd., shipments of Asahi pools by Irwin Toy, Ltd., to the United States, and U.S. imports from Japan, 1973-76, January-March 1976, and January-March 1977

Period	Apparent U.S. consumption (1)	U.S. imports from Asahi (2)	Shipments of Asahi pools by Irwin Toy, Ltd., to the United States (3)	U.S. imports from Japan (4)	Ratio of (2) to (1)	Ratio of (3) to (1)	Ratio of (4) to (1)
	Units	Units	Units	Units	Percent	Percent	Percent
1973-----	101,702	0	0	0	-	-	-
1974-----	112,826	0	0	0	***	-	-
1975-----	***	***	0	***	***	-	***
1976-----	***	***	***	***	***	***	***
Jan.-Mar.--							
1976-----	***	***	***	***	***	-	***
1977-----	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

