



United States International Trade Commission

Budget Justification

Fiscal Year 2027



Table of Contents

Alphabetical Listing of Abbreviations and Acronyms	iii
Introduction	5
Mission	5
Responsibilities and Goals	6
Budget Highlights	15
Impact of Continued Funding at \$122 Million	15
FY 2027 Budget Request	15
Workload Drivers.....	17
Program Overview.....	18
Antidumping/Countervailing Duty Investigations and Unfair Import Investigations (Section 337)	18
Analysis and Information on Trade and Competitiveness.....	21
The Harmonized Tariff Schedule Application Needs Technology and Process Improvements.....	23
Information Technology Overview	24
Risk Management and Planning.....	25
Good Accounting Obligation in Government Act.....	26
Publications Proposed for Elimination	26
Preparing for Future of Work and Physical Space Reconfiguration	27
Appropriations Language.....	29
Salaries and Expenses.....	29
Trade Remedy Investigations	31
Import Injury Investigations	31
Import Injury Investigations Caseload	35
Unfair Import Investigations.....	37
Unfair Import Investigations Caseload	44

Analysis and Information on Trade and Competitiveness	45
Industry and Economic Analysis	45
Workload Expectations in FYs 2026 and 2027.....	48
Industry and Economic Analysis Investigations Caseload	51
Tariff and Trade Information	53
The Harmonized Tariff Schedule of the United States	53
DataWeb	54
Information Technology.....	55
General Statement	55
Supporting the Agency’s Mission	56
Information Security.....	56
Digital Systems Modernization.....	58
The Office of Inspector General.....	61
Budget Data	63
Obligations: Comparison by Budget Object Classification, Fiscal Years 2025–27	63
Obligations: Comparison by Strategic Goal, Fiscal Years 2025–27.....	64
Analysis of Change by Budget Object Classification, Fiscal Years 2025–27.....	65
Summary of Changes from the FY 2026 Estimate	66
Human Resources Data	69
The Commissioners	69
U.S. International Trade Commission Office-level Organization Chart	70
Current Permanent and Term Hiring Plan and Onboard Staffing Levels	71

Alphabetical Listing of Abbreviations and Acronyms

Acronym	Description	Acronym	Description
AD/CVD	antidumping/countervailing duty	HTS	Harmonized Tariff Schedule of the United States
ALJ	administrative law judge	HWM	House Ways and Means Committee
APO	administrative protective order	IDS	Investigations Database System
ATO	authority to operate	IP	intellectual property
CBP	U.S. Customs and Border Protection	IT	information technology
CDM	continuous diagnostics and mitigation	KEV	known exploited vulnerability
Census	U.S. Census Bureau	NAFTA	North American Free Trade Agreement
CISA	Cybersecurity and Infrastructure Security Agency	OIG	Office of Inspector General
CIT	U.S. Court of International Trade	OMB	Office of Management and Budget
Commerce	U.S. Department of Commerce	PII	personally identifiable information
DLP	data loss prevention	SCA	security controls assessment
EDIS	Electronic Document Information System	SFC	Senate Finance Committee
ERM	enterprise risk management	USITC	U.S. International Trade Commission
Federal Circuit	U.S. Court of Appeals for the Federal Circuit	USMCA	United States-Mexico-Canada Agreement
FY	fiscal year	USTR	The Office of the United States Trade Representative
GAO	U.S. Government Accountability Office	WCO	World Customs Organization
GSA	U.S. General Services Administration	WTO	World Trade Organization
HSPD-12	Homeland Security Presidential Directive 12		

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Introduction

The U.S. International Trade Commission (Commission or USITC) is an independent, nonpartisan federal agency with specific responsibilities in adjudicating and enforcing certain U.S. trade laws, providing relevant and timely analyses to the President and Congress on trade issues, and maintaining the Harmonized Tariff Schedule of the United States (HTS).

The Commission adjudicates disputes and enforces U.S. laws through investigations and adjudications to ensure that U.S. businesses and workers do not face unfairly traded and injurious imports in the U.S. market. These laws address issues such as dumped or subsidized imports or imports that infringe U.S. intellectual property rights and may result in additional duties on or exclusion of unfairly traded imports.

The Commission also maintains the HTS. The HTS sets out the tariff rates and statistical categories applicable to U.S. imports. Its maintenance is essential to accurately and effectively collecting tariffs imposed on goods entering the United States.

Beyond the HTS and our work to enforce U.S. trade laws, the Commission analyzes how international trade impacts the U.S. economy and American workers. Congress and the President frequently turn to us for our uniquely nonpartisan and independent expertise, requesting that the Commission conduct investigations and provide technical assistance on a range of issues to inform U.S. trade policy. In recent years, the Commission has provided Congress and the President with information and analysis on a variety of topics including various matters pertaining to tariff and non-tariff measures, greenhouse gas emissions intensities of U.S. steel and aluminum industries, the global competitiveness of the U.S. rice industry, and the United States-Mexico-Canada Agreement (USMCA).

Mission

As established by Congress, the Commission's mission is to apply its expertise in international trade matters to serve policymakers and the public: by investigating and addressing unfair imports and other trade practices that injure U.S. industries, providing information and analysis of international trade and competitiveness issues, and maintaining the Harmonized Tariff Schedule of the United States.

Across these mission areas, the Commission provides independent, timely, and sound information and analysis. The Commission must remain responsive to evolving global trade issues that require us to develop new analytical methods and expertise to ensure we are able to provide sound analyses. One example of this is the Commission's ability to provide information and analysis of the impact of tariffs and non-tariff barriers on trade and other economic factors to the executive and legislative branches.

Responsibilities and Goals

The Commission enforces U.S. trade laws through investigations of imports alleged to be dumped, subsidized or otherwise unfairly traded or injurious and also conducts factfinding investigations to provide trade policy makers information and analyses on international trade and competitiveness issues. The Commission categorizes its investigations into three major classes:

- **Import injury investigations**, which include antidumping and countervailing duty (AD/CVD) investigations and five-year reviews of existing AD/CVD orders conducted pursuant to Title VII of the Tariff Act of 1930, global safeguard investigations of import surges that injure a U.S. industry conducted under section 201 of the Trade Act of 1974, as well as others.
- **Unfair import investigations** conducted pursuant to section 337 of the Tariff Act of 1930, usually based on infringement of intellectual property (IP) rights by imported goods, e.g., patent or trademark infringement, as well as other unfair acts such as trade secret misappropriation, false advertising, and false designation of origin.
- **Factfinding investigations and trade policy support** conducted pursuant to section 332 of the Trade Act of 1930 and various other statutes such as section 131 of the Trade Act of 1974 and statutes for specific trade agreements.

In AD/CVD investigations, we determine whether a U.S. industry is materially injured or is threatened with material injury, or whether the establishment of an industry is materially retarded, by reason of dumped or subsidized imports. If we make affirmative determinations and the U.S. Department of Commerce (Commerce) finds that those imports are being dumped or subsidized, Commerce orders the imposition of additional duties on these imports—antidumping duties that offset the dumping or countervailing duties that offset subsidies.

We also review existing antidumping and countervailing duty orders every five years. During these five-year reviews, we determine whether an order can be revoked without resulting in continued or recurrent injury to a domestic industry. If the Commission determines that injury is not likely to continue or recur (or Commerce determines that dumping or subsidization is not likely to

continue or recur), Commerce will revoke the order.

In addition, we have sole responsibility to conduct investigations under section 201 of the Trade Act of 1974. If we determine that an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or threat of serious injury, to the domestic industry producing an article like or directly competitive with the imported article, we recommend one or more actions to the President that would remedy the injury and facilitate industry adjustment to import competition, such as the temporary imposition of additional duties. The President makes the final decision on whether to provide a remedy, and the type and duration of any such remedy.

Section 337 investigations examine unfair practices in import trade (other than those addressed under Title VII). These investigations most frequently involve allegations of patent or trademark infringement, copyright infringement, misappropriation of trade secrets, passing off, false advertising, and antitrust violations. If a violation is found, we issue exclusion orders, which bar entry of unfairly traded imports, or “cease and desist” orders, which prohibit the unfair acts in the United States, provided that the public interest does not preclude the issuance of such relief.¹

Under section 332, whenever requested, we present the President, and, by delegation, the United States Trade Representative (USTR), the Senate Finance Committee (SFC), or the House Ways and Means Committee (HWM) with information and analysis on any matter related to international trade and industry competitiveness. This support includes both technical assistance and factfinding investigations. In our factfinding investigations, we typically analyze the ways that trade, trade policy, and competitiveness affect U.S. workers, producers, consumers, and the U.S. economy. The Commission also has the authority to initiate factfinding investigations on its own initiative. Our analyses help inform policymakers’ decisions on trade policy and international trade negotiations and to better understand the economic and distributional impacts of trade.

The Commission reinforces its commitment to fulfilling these mandates with timely, transparent, thorough, and high-quality determinations and analyses in accordance with its strategic goals. The Commission’s first two strategic goals guide how we carry out our investigations, while our third strategic goal and its associated objectives provide the performance framework for accomplishing our investigative and analytical responsibilities.

¹ If the Commission finds a violation and issues an exclusion order and/or cease and desist order, the President has 60 days to approve or disapprove such relief on policy grounds.

First strategic goal — Investigate: conduct efficient and effective investigations

The Commission’s investigations often involve products or industries that are critical to U.S. productivity, innovation, and competitiveness. Policymakers and businesses rely on our analysis and determinations to make important decisions. Our efficient and effective investigations are underpinned by objectives ensuring expeditious and transparent proceedings and regular engagement with relevant stakeholders and experts, including our statutory requestors, U.S. industries, workers, and the American public.

We typically institute trade remedy investigations in response to complaints and petitions filed by domestic industries and workers seeking protection from unfairly traded imports. Given the rapid evolution of trade in the U.S. and world economies, this work is important in several ways:

- Our investigations of unfair and injurious trade practices help U.S. firms compete more effectively in an integrated global marketplace.
- Our issuance of sound and timely decisions in import injury investigations helps ensure that U.S. companies and workers can compete on a more level playing field in the domestic market.
- Our timely resolution of complex IP disputes is economically critical to holders of U.S. IP rights and the businesses that rely on those rights to remain competitive, especially where innovation drives rapid technology change.

In enforcing U.S. trade laws, we conduct our investigations under the pertinent statutes, regulations, and case law as interpreted by the federal courts. Our determinations in both AD/CVD and section 337 investigations are subject to review by U.S. courts. Although most requests for factfinding investigations come to us from the SFC, HWM, and USTR, pursuant to section 332 of the Trade Act of 1930, some of our investigations are required by various other statutes or are self-initiated. In response to requests, the Commission provides information and cutting-edge analyses that inform the development of U.S. trade policy. Providing this information and analysis in a timely manner assists policymakers during trade negotiations, in enacting legislation, or taking other policy actions that affect U.S. workers and the competitiveness of U.S. industries as well as the overall U.S. economy.

The Commission conducts comprehensive outreach and engagement to support its investigations. We regularly reach out to bar groups, industry and firm representatives and advocates, requestors of Commission work products, experts, and other representatives and stakeholders. These efforts support public understanding of the Commission’s work, target Commission

capacity-building efforts for future requests, diversify our knowledge base, and gain valuable feedback on Commission analysis. For example, in response to stakeholder engagement and feedback from counsel representing U.S. industries and importers, the Commission developed a publicly available report providing five-year review initiation dates, which allows parties to efficiently plan for and participate in import injury review proceedings.

Second strategic goal — Provide accurate information and sound and informed analysis

In recent years, changes in the global trading environment have brought new issues to the Commission’s investigations and determinations. The petitions filed with the Commission in import injury investigations reflect increasing global and industry complexity. These investigations face analytical challenges associated with interconnectedness of firm relationships, structure of multinational firms and conditions of competition, wide-ranging nature of market participation, rapidly changing technology, and evolution of the supply chain—all of which are conducted in a quasi-judicial forum. To address the depth and scope of these investigations, we collect large-scale, detailed, and primarily confidential data and information from the relevant industries, provide multiple perspectives of analysis reflecting industry and market structure, and develop comprehensive records and issue opinions that can withstand litigation and judicial review. Similarly, in unfair import investigations parties produce large amounts of detailed, primarily confidential information and data either through primary sources or expert opinions that results in a comprehensive record from which the Commission can develop a sound and informed determination.

Similarly, policymakers have expanded the range of complex industry and economic analysis they request from the Commission. Our requestors recognize that due to our economic and trade expertise, we can generate primary data, analyze specific industries and supply chains, and provide insights unavailable elsewhere. To improve our analyses, we also regularly develop and deliver to our requestors new analytic tools, such as economic models that measure the effects of trade on U.S. workers, on specific U.S. industries, and on U.S. companies operating abroad. The goal for developing sound and informed analyses and determinations is underpinned by objectives to provide comprehensive, evidence-based analysis and determinations developed through investment in regularly updated research priority areas, and to provide clear and accurate information in Commission work products.

As a vital part of this strategic goal, we also maintain and analyze the HTS. The HTS sets out the tariff rates and statistical categories for all merchandise imported into the United States. We make sure that the HTS is up to date and accurately reflects tariff rate modifications adopted by Congress or the President. In addition, we work to ensure that changes in the international Harmonized System for goods classification, which is administered by the World Customs Organization, reflect the interests of U.S. stakeholders.

To meet our existing mission and any new mandates, we must maintain the staff, analytic tools, and other resources needed to conduct fair and efficient investigations, maintain the HTS, and provide high-quality, accurate, and objective information and analysis on a wide array of issues. The FY 2027 budget request will allow the Commission to continue to invest in the development of highly skilled analysts, economists, and attorneys; re-engineer the HTS application to increase the efficiency of implementing tariff changes and improve accessibility and functionality for users; create new databases and data systems; collaborate with other organizations to enhance our own research; and acquire new, or upgrade existing, advanced analytic tools.

Third strategic goal – Perform: continuously advance organizational excellence

Efficient and effective management increases the agency’s ability to meet its mission. The first strategic objective of the goal to advance organizational excellence is to attract, recruit, develop, and retain a qualified, accountable, and versatile workforce, which is essential to meeting the varying workload and new mission requirements. The USITC has a rigorous process for evaluating human capital needs which involves applying a risk assessment to each position in every office of the agency related to its role in ensuring statutory mission accomplishment. This annual risk analysis is based on measurable workload metrics which are tied directly to all statutory mission and statutory mission-support activities. With new legislative mandates, an increased focus on tariffs, and an investigative workload that remains high and continues to increase, we have a growing workforce requirement gap that must be closed to avoid an unacceptably high risk of failing to meet our mission in FYs 2026 and 2027. To continue our success in advancing organizational excellence through a qualified and versatile workforce, and to prevent staff burnout and accelerating departures, we need to recruit and train more staff. USITC has committed to achieving efficiencies in its recruitment process to ensure we can quickly hire and maintain the workforce needed to handle the Commission’s increasing workload. In recent years we have focused on improving the efficiency of our hiring through collecting and tracking detailed data on each phase in the hiring process and analyzing the data to identify potential bottlenecks. In FY 2025, USITC achieved an average time-to-hire of less than 85 days from initiation of the hiring action to the date the selectee onboarded at the agency.

Our second strategic objective for this goal is to ensure responsible, diligent, and transparent stewardship of taxpayer funds. During FY 2025 we accomplished this as follows.

- We completed the engagement phase for migrating our financial operations to the Department of the Treasury’s Administrative Resource Center (ARC). In early FY 2026, we successfully completed the migration.
- We reviewed our contracting processes and contract files to ensure they meet the needs of customers in a timely way and that the files are accurate.

- We ensured that financial controls are documented, implemented, reviewed, and refined on a regular basis to maintain an annual unmodified audit opinion.
- We required managers to tie budget requests for personnel and non-personnel funding to risk assessments and projected workloads, and provide linkage to performance planning, i.e., specific outcomes.

Our financial management processes are reviewed and updated annually, summarized in standard operating procedures manuals, and accompanied by our control evaluations, which supported the achievement of our fifteenth consecutive unmodified financial audit opinion during FY 2025. In FY 2026, we will continue to explore ways to reduce costs and further streamline our financial management processes.

Our third strategic objective for this goal is to implement and maintain reliable and secure systems that promote efficiency, resilience, innovation, and portability. Our IT performance goals demonstrate how the Office of the Chief Information Officer (OCIO) supports this objective. The Chief Information Officer, as the leader for this strategic objective, ensures that critical IT systems are continuously available, accessible, and optimized to conduct Commission operations with little to no loss of efficiency and capability. Additionally, the OCIO continues to ensure our IT security by complying with federal cybersecurity priorities and best practices.

To achieve our third strategic objective and address government-wide priorities and initiatives, we:

- maintain the availability of core IT systems
- verify and validate our ability to restore business information in emergency situations, compromise, or attack by threat actors
- adhere to strict security configurations
- follow a well-defined vulnerability patch process that prioritizes the remediation of known exploitable vulnerabilities
- ensure that our systems have a valid Authority to Operate
- continuously monitor the effectiveness of security controls
- maintain a modern IT infrastructure
- utilize virtualization and automation to consolidate resources, improve network and system availability, and optimize performance
- migrate appropriate applications and services to a hybrid architecture, combining local and cloud-based resources into one cohesive architecture.

Our fourth strategic objective of this goal is to manage, use, and release data to inform decision-making. We recognize the importance of leveraging data as an asset and are focusing significant effort and resources on addressing our needs in this area, including priorities contained in various federal initiatives. To achieve this objective, we:

- strive to strengthen agency-wide data governance by enhancing enterprise-wide strategies, objectives, and policies for managing data
- seek to advance the agency's strategic use of data by identifying priority questions of decision makers and deploying accurate, timely, insightful, and relevant information to answer them
- ensure data are leveraged as a strategic asset by making them discoverable
- strive to foster transparency by developing and deploying cutting-edge technologies to improve the flow of information; and develop controls to ensure data are appropriately protected from creation through destruction.

Our fifth strategic objective is to increase our operational effectiveness by evaluating and improving processes and communication. Operational effectiveness is about continually evaluating and improving our business processes and communication to deliver better results. To accomplish this, managers lead and control the activities within the agency and continually measure and improve the processes for which they are responsible.

Strategies we will continue to use to meet this strategic objective include:

- continuing to conduct internal evaluations of our processes and using enterprise risk management (ERM) to identify risks and prioritize areas for improvement
- focus efforts to more effectively manage agency-wide policy development and continue to invest in and modernize IT infrastructure and management systems
- focus on further integrating ERM into strategic planning, performance management, and budget processes
- continue efforts to modernize administrative policies and procedures, guidance, and other administrative materials related to the activities of the agency to reduce resources required to maintain this information and improve its accessibility
- continue streamlining and improving personnel vetting processes and efforts to ensure information security.

During FY 2025, the Commission continued to make improvements to operational processes and procedures and to its use of risk analysis. For factfinding investigations, the Commission dedicated additional resources to modernizing its review processes and ensuring accurate and consistent citing of sources across reports. The Commission recognizes that resource constraints, unexpected external requirements, and other priorities may slow efforts to fully accomplish all planned initiatives. We continue to evaluate how to improve our planning and ERM processes and how to make more effective use of the data that we collect. Our management committees provide information to the Performance Management and Strategic Planning Committee (PMSPC) on any changes to the risks and the PMSPC makes a final determination on risks, as they relate to the top agency risks. This process has resulted in a more in-depth analysis of risks and ways to mitigate them so that the Commission continues to meet its mission and achieve its performance goals.

Detailed performance goals for program and management activities are presented in our *Annual Performance Plan, FY 2026–2027*, and our *Annual Performance Report, FY 2025*, both of which can be found at https://www.usitc.gov/strategic_plan.htm.

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Budget Highlights

Impact of Continued Funding at \$122 Million

For our FY 2023 appropriation, the Congress provided much-needed support with a \$12.4 million increase, bringing our FY 2023 appropriation to \$122.4 million. The additional funding enabled us to begin a long-overdue hiring initiative that aimed to provide staffing levels commensurate with record workload. Our staffing level (full-time equivalents, or FTEs) increased from the low 400s to 433 in FY 2025, when we again saw caseload surge to record highs for AD/CVD petition filings and remain high in our other mission areas. We expect high AD/CVD caseload in FYs 2026 and 2027, with increases anticipated for new section 337 complaints and factfinding investigations and sustained high workload in the areas of tariff affairs and trade policy support.

Our FY 2026 budget request of \$134 million reflected the funding level necessary to meet our statutory mandates and address existing and projected workload. However, operating for a fourth consecutive year with a \$122 million appropriation in FY 2026 threatens that ability. The funding is insufficient to support our staffing needs. We project that with an appropriation of \$122 million in FY 2026, we can support a staffing level of 412 FTEs, while our projected workload requires an estimated 441 FTEs. The potential impacts of insufficient staffing levels will be felt across our mission areas and include:

- risk of missed AD/CVD deadlines and delay or lapses in relief for injured U.S. companies and workers
- delayed relief for domestic industries affected by IP theft, patent infringement, and other unfair acts
- compromised ability to make timely Harmonized Tariff Schedule of the United States (HTS) revisions and further modernization of the HTS
- longer lead times or missed deadlines for delivery of 332 investigation reports and technical assistance to USTR and Congress, reducing timeliness of requested information to trade policy makers
- reduced information and analysis and increased risk of inaccurate information in Commission investigations and reports.

FY 2027 Budget Request

For FY 2027, the Commission requests \$134 million to enforce U.S. trade laws to ensure that U.S. business and workers do not face

unfairly traded or injurious imports and can compete on a level playing field in the U.S. market; maintain and update the HTS to accurately reflect tariffs on imported goods; and provide objective, fact-based information on trade and U.S. competitiveness matters in the form of factfinding investigations or technical assistance at the request of the President, Congress, or the U.S. Trade Representative (USTR) to support trade policy activities of the U.S. government.

The request is required to increase staffing levels after making significant human capital investments in FY 2024 and the first part of FY 2025 that cannot be sustained with a \$122 million FY 2026 appropriation. Our FY 2027 staffing goal is to attain a staffing level of 441 FTEs, the number needed to achieve our mission during a time of record workload, with manageable risk levels across all mission areas. As of late January 2026, we had 398 staff onboard, with vacancy rates as high as 20 percent in offices responsible for statutory workload. While we have recently resumed hiring and are striving to meet 412 FTEs for the fiscal year, this staffing level is still insufficient for our current workload.

The volume and complexity of our workload demand a challenging level of effort by our current number of staff and risks burnout and further attrition. Given this high volume of workload and current Commission staffing level, many Commission offices are facing a short-term inability to meet aspects of their mission or statutory requirements. Our hiring plan is focused on filling the most critical positions necessary to accomplish the Commission's mission and mitigate risks, as determined by a data-driven and risk-informed analysis performed by the Commission's Human Capital and Performance Management and Strategic Planning Committees.

The request also provides resources for IT investments needed to continuously advance the security and capabilities of our IT infrastructure, continue timely equipment lifecycle replacements, improve web-based applications, and maintain and optimize the newly re-engineered HTS system. The request also ensures the availability and accessibility of our public-facing IT systems, as well as ensuring they are compliant with mandated standards and best practices. Specific FY 2027 IT investments include replacement of end-of-life network equipment, the continuation of third-party cybersecurity assessments and testing, the migration of file shares to the cloud for redundancy, the integration of artificial intelligence (AI), and improved backup capabilities. Additionally, this request includes funds to continuously optimize and maintain virtual hearing capabilities used to provide a higher level of availability and accessibility to public and intra-governmental customers who use our facilities, such as the Office of the United States Trade Representative.

Workload Drivers

The Commission continues to experience sustained record levels of AD/CVD activity and a higher number of unfair import investigations as described below, and we have been devoting more resources to conducting or supporting other investigations and Administration initiatives. Due to recent increases in petition filings in import injury investigations coupled with low levels of terminated orders, the average number of instituted and completed investigations has almost doubled in the last decade with commensurate increases in monthly import injury activity levels. In FY 2025 the Commission recorded its highest-ever number of petition filings and final phase investigations. This workload is expected to remain at record levels due to sustained increases in original investigations as well as investigations returning for five-year reviews. Although AD/CVD investigations represent the bulk of import injury activity, the Commission handles all litigation-related activity stemming from these investigations, which this past year was higher than previous years, and intermittent global safeguard investigations, such as the quartz surface products safeguard investigation.

In FY 2025, the total active number of section 337 investigations increased over FY 2024, while the rolling 10-year average for new complaints continued its overall upward trend. The settlement rate in section 337 remained relatively low, so we expect the majority of current unfair import investigations to remain before the Commission for longer. In addition, from November 17, 2025, to January 30, 2026, 21 new complaints were filed resulting in 21 new complaints being instituted as of January 30. As of January 30, there are six complaints pending institution by the Commission and the private bar has shown that there is great interest in filing additional complaints. We expect the high number of overall active investigations to continue to increase in FYs 2026 and 2027, given the surge of new petitions in early FY 2026 and the low settlement rates.

At the same time, the increased complexity of trade policy support requests and factfinding investigations has required more research and resources. The increasing complexity of our technical assistance requests and our reports, such as *Greenhouse Gas Emissions in the Steel and Aluminum Industries* and the *USMCA Automotive Rules of Origin*, has increased requirements for innovative analysis and increased the number of staff and hours devoted to these activities. For example, hours spent per investigation have risen more than 40 percent over the past five years despite the number of factfinding investigations conducted having fluctuated year to year.

In addition, we have amended the HTS more often in recent years to incorporate changes brought about by Administration initiatives. Prior to FY 2018, we would typically publish the HTS two or three times per year. Since FY 2018, we have averaged 17 HTS publications per year. In FY 2025, we helped the Administration draft nomenclature for over 40 tariff actions and prepared and published the HTS 26 times. The amount and complexity of the tariff changes implemented with each HTS publication have also grown significantly, particularly in FY 2025. These tariff changes have prompted an unprecedented increase in HTS Help inquiries, receiving more than twice as many in FY 2025 (5,522) compared to FY 2024 (2,298). We anticipate the volume and complexity of tariff changes will continue to be a salient workload driver in FYs 2026 and 2027.

Program Overview

Antidumping/Countervailing Duty Investigations and Unfair Import Investigations (Section 337)

The Commission provides a venue for private sector firms and other qualifying entities to bring allegations of certain unfair or injurious trade practices involving imports before an independent, objective, and expert quasi-judicial governmental body. Our trade remedy investigations caseload continues to grow in volume and complexity. In FY 2024, the Commission experienced a surge in the number of AD/CVD petition filings, reaching its second-highest level in the last two decades, followed by another surge in FY 2025, reaching record-level filings. The caseload is expected to continue to remain elevated in FYs 2026 and 2027, driven by both original investigations (preliminary and final phases) and the structural increase in reviews of existing orders required every five years after imposition. In FY 2025, new unfair import (section 337) matters remained steady, consistent with the 10-year monthly average. We experienced a surge of complaints filed in the first quarter of FY 2026, which together with low settlement rates create the expectation of active investigations increasing somewhat in FYs 2026 and 2027.

AD/CVD Caseload is at Record High Levels

In FY 2025, we surpassed FY 2024 highs to reach a record level of petitions, which contributed to record-level institutions and active investigation levels. In FY 2025, 27 petitions were filed under Title VII of the Tariff Act of 1930. In FY 2025, more than one-half of the petitions involved imports from multiple countries. Domestic industries filing petitions in FY 2025 produced a range of products, including consumer/industrial goods, chemical, intermediate products, minerals, agricultural, and steel-related products.

Most of the investigations covered consumer/industrial (8), chemical (7), and intermediate products (6). Additional investigations covered mineral, steel-related, and agricultural products (2 each). Some investigations were notable because of the size and/or complexity of the U.S. industry and market, including solar products, float glass, rebar, methylene diphenyl diisocyanate (MDI products), unwrought palladium, thermoformed molded fiber products, abrasive grains, and active anode material. In addition to new investigations, we instituted 34 reviews of existing AD/CVD orders in FY 2025 and anticipate instituting 45 in FY 2026 and 34 in FY 2027. While import injury review activity increased, safeguard activity is characterized by year-to-year fluctuation. In FY 2025, the Commission received one safeguard petition on quartz surface products and anticipates conducting an end-of-relief review for crystalline silicon photovoltaic cells and modules (solar products) and a mid-term review for fine denier polyester staple fibers in FY 2026. Overall, the Commission instituted 91 investigations and reviews and completed 89 investigations and reviews in FY 2025. Recent activity reflects a sustained increase in filing activity and continued increases in five-year review caseload. In FY 2026, we anticipate instituting 87 proceedings and completing 88. In FY 2027, we anticipate instituting 70 proceedings and completing 78. Though cyclical, the Commission's caseload is projected to remain at historically high levels. Whereas the 10-year average for institutions and completions was 40 during FYs 2002-11 and 53 during FYs 2012-21, the five-year average for FYs 2022-26 is 73 (an 82 percent increase over the first 10-year period and a 38 percent increase over the second).

During FY 2025, we continued our efforts to increase the transparency of our proceedings and reduce the burden on participating parties, as well as increase investigative efficiency. We leveraged information from the Commission's Investigations Database System (IDS) to develop a report on five-year reviews. The report followed engagement and requests from external stakeholders and provides counsel representing U.S. industries and importers efficient and accurate information on scheduled reviews. In FY 2025, we continued to improve the functionality and utility of IDS and developed, tested, and implemented version 2 requirements.

Unfair Import Investigations Caseload Remains High

During FY 2025 the overall number of active 337 investigations rose by 10 percent. From November 17, 2025, to January 30, 2026, 21 new complaints were filed resulting in 21 new complaints being instituted as of January 30. As of January 30, there are six complaints pending institution by the Commission and the private bar has shown that there is great interest in filing additional complaints. As a result of the increasing number of complaints filed and the low settlement rate, we anticipate that there will likely be an increased number of active investigations in FY 2026 into FY 2027 and beyond.

Our proceedings provide for timely resolution of matters involving imported goods alleged to infringe U.S. intellectual property (IP) rights and imports that are involved with other unfair acts or methods of competition, such as trade secret misappropriation, that harm domestic industries. Indeed, it has been reported that nearly a quarter of the patent trials in the United States occur at the Commission. Section 337 authorizes relief in the form of exclusion of infringing or otherwise unfairly traded imports at the border, as well as cease and desist orders that prohibit domestic marketing and sales of the unfairly traded imports. IP-intensive domestic industries that seek relief against unfair imports under section 337 account for a large number of high-wage jobs in U.S. industries that generate significant exports.

The range of technologies covered in these investigations is quite broad, encompassing, among other things, various electronic devices, pharmaceutical and medical devices, manufacturing and transportation-related products, and consumer goods such as eye cosmetics, hydroderm abrasion systems, storage containers, solar cells, flash spun non-woven materials, crafting machines, injection molding machines, ceiling fans, and furniture. Section 337 investigations typically involve allegations of patent infringement but may also involve other unfair acts such as trademark infringement, trade dress infringement, false advertising, and trade secret misappropriation, the latter of which is an area of heightened concern for U.S. companies and Congress.

Work is ongoing to ensure that section 337 investigations are completed expeditiously, in line with congressional intent. We continue to build and develop the necessary staff and resources to conduct evidentiary hearings in section 337 investigations, focusing on making the process more efficient and less costly for both litigants and the agency. We continue to optimize courtroom technologies facilitating better presentations of evidence and witnesses, allowing witnesses to appear remotely or in person, and supporting remote access to our proceedings when appropriate. We have also made improvements to our rules of procedure, procedural pilot programs, and continued investments in our Electronic Document Information System (EDIS). In FY 2026, we plan to implement electronic service of confidential documents through EDIS, and we plan to develop and launch the second version of the Investigations Database System. These technology projects necessitate an adequate level of funding to maintain these important spaces and technology systems that support the Commission's mission.

Synergies between EDIS and IDS have helped us to better manage our large volume of investigation-related materials while making our investigative process more transparent. These systems also comply with government Open Data rules, furthering our efforts to make our data more accessible to and usable by other agencies and the public. Funding these types of improvements will help us to address the challenges of resolving section 337 matters expeditiously and will keep the public informed on these matters.

Analysis and Information on Trade and Competitiveness

The Commission supplies the executive branch, Congress, and the public with objective analyses of significant trade issues. We provide industry and economic research, tariff and trade information, and trade policy support through factfinding investigations and technical assistance. Given our independent economic and trade expertise, we offer cutting-edge data and insights not available elsewhere that support the Administration and Congress in their development of U.S. trade policy. The caseload for factfinding dipped in FY 2025, but the number of requests for this type of analysis is projected to increase in FYs 2026 and 2027. This temporary dip in workload for factfinding investigations has allowed the Commission to flex its resources to support an increase in the number and complexity of technical assistance requests as well as an increase in workload in other mission areas. It has also allowed the Commission to expand capacity to develop new approaches to industry and economic analysis and improve its ability to be responsive to future request of trade policy makers.

Congress and the Administration place a high value on our staff's ability to produce timely, objective, and independent information related to their most urgent issues. We draw heavily on staff in all agency program areas to respond to requests for trade policy support from Congress and the Administration. In FY 2025, we supplied responses on a broad array of issues and topics, such as supporting interagency working groups, digital services trade, analysis of tariff and non-tariff measures, assessments of remedies in safeguard investigations, and litigation support in international tribunals. Moreover, increased focus on how policies, regulations, and non-tariff measures applied to domestic markets can affect international trade and investment have required us to refocus our resources, apply new analytic techniques, and develop new trade-related databases. Our staff often provides support to policymakers developing new or revising existing trade programs and policies as well as negotiators working on proposed trade agreements or adjustments to existing agreements. We supply information, expertise, and software-based tools to support U.S. negotiating teams.

We Continue to Develop New Approaches in Our Industry and Economic Analyses

International trade touches nearly all sectors of the U.S. economy. We constantly develop and refine our capabilities to meet requests for increasingly complex analyses in emerging areas of international trade, trade policy, and competitiveness. We gather primary data to provide unique insights into emerging issues, assembling this information via a variety of instruments, including carefully crafted industry surveys.

We also continue to develop new methods to produce high-quality economic analysis to meet analytical priorities relevant to our requestors. During FY 2025, our priority effort for model innovation was improving modeling tools to quantify the effects of the economic impact of tariff and non-tariff measures. We also created new models to estimate the impact of trade and investment in industries such as motor vehicles, critical minerals, shipbuilding, and solar modules. Our work to develop and refine our capabilities is done both specifically in response to requests for 332 factfinding investigations, but also in anticipation of future requests so that the Commission has the expertise and the analytical tools ready to be responsive to requests from the Administration and Congress, often on short timelines. While the Commission's capacity building efforts are continuous, it is at times when requests for 332 investigations or technical assistance dip, that our staff are able to amplify their efforts to strengthen their capacity to address emerging areas of international trade and competitiveness of interest to policy makers through the development of new tools and expertise.

Our FY 2027 budget request will strengthen our ability to respond to specific requests and increase capacity in areas we have prioritized because of potential interest from the President and Congress. A few examples include:

- advancing our modeling capabilities, such as estimating the impact of tariffs and foreign nontariff barriers on specific industries and broader macroeconomic outcomes
- expanding analysis in areas such as the impact of global imbalances on U.S. industries and workers; trade diversion and transshipments; investment; and industry competitiveness
- risks and vulnerabilities in U.S. supply chains, including trade in critical minerals and materials, such as the impact of export bans or new suppliers of minerals and examination of linkages in supply of national security products
- deepening expertise on provisions in trade agreements and their effects on U.S. trade, industries, and workers
- generating, maintaining, and publishing analytical databases of trade, production, and investment to allow the rapid deployment of data to new requests
- technical support to policymakers during trade negotiations.

To effectively support the requests of trade policymakers, we must maintain a staff with expert knowledge and skills to provide relevant and timely insights on trade, investment, and the international competitiveness of U.S. companies in the global marketplace.

The Harmonized Tariff Schedule Application Needs Technology and Process Improvements

Our work to maintain and update the HTS, as discussed above, also impacts the Administration, private parties, and other stakeholders. U.S. Customs and Border Protection (CBP) relies upon the HTS for collecting tariff revenues on imported goods. Private firms use the HTS to learn the duties that they will pay on imported goods. U.S. exporters and importers depend on our work in the World Customs Organization to ensure that international nomenclature is harmonized and considers U.S. stakeholder interests and changing patterns of trade. Compared to two or three publications containing HTS revisions in a typical year, in FY 2025, we prepared and published the HTS 26 times, including the annual Basic Edition in January 2025, and these publications grew in complexity and the number of tariff changes involved. Revisions were made to reflect trade actions with respect to, inter alia, imposition of duties to address the synthetic opioid (fentanyl) supply chain, reciprocal tariffs to rectify trade practices that contribute to U.S. goods trade deficits, suspension of de minimis duty treatment, modifications of section 232 duties on steel and aluminum products, imposition of section 232 duties on copper and copper derivative products and autos and auto parts, modifications to section 301 duties on articles of China resulting from USTR's four-year review of the section 301 investigation of China, granting exclusions to the section 301 duties on articles of China, as well as other conforming or technical amendments. As a result of the increased number and complexity of the aforementioned tariff changes, HTS Help inquiries more than doubled from 2,298 in FY 2024 to 5,522 FY 2025.

The HTS provides the foundation for the U.S. trade data maintained by the U.S. Census Bureau (Census), and it enables CBP to manage its trade and enforcement activities. We ensure that the HTS is both accurate and up to date so that it meets the demands for trade and tariff information from Census, CBP, U.S. exporters and importers, the Administration, and policymakers in Congress. Due to the size and openness of the U.S. economy and the volume of U.S. trade, the HTS is the most heavily used tariff schedule in the world. In FY 2025, the HTS application was accessed more than 16.7 million times, more than three times as many visits seen a decade earlier and a 67 percent increase over FY 2024. It is, therefore, critical that the HTS contain accurate and timely information in an accessible and navigable application. To this end, in FY 2024, we evaluated the effectiveness of the current application that supports the HTS and documented deficiencies. We concluded that, to most benefit the U.S. government and the private sector that rely upon the HTS, the current application requires a major upgrade and development effort. In FY 2025, we documented requirements for this upgrade, such that development of the upgraded system commenced in FY 2026. In documenting requirements, we published a Federal Register Notice seeking public comment and held several listening sessions with key

government partners such as House Ways and Means staff, USTR, CBP and Census. The development phase in FY 2026 will involve implementing the requirements and iterative testing of the new application with both internal and external stakeholders. This critical work requires significant resources—both information technology (IT) and subject matter experts. These are the same resources needed to maintain the current HTS, which entails not only updating information in the system, but also supplying expertise in national and international fora to ensure terminology is consistently used, and tariff actions are properly reflected, in the HTS. As the number of tariff-related actions increases in number or complexity in the next few years, the success of the needed upgrade to the HTS application will be at risk without a commensurate increase in IT and staff resources. In FY 2027, we expect follow-on enhancements and support requests as users become more familiar with the new system, which will be called the HTS System.

Information Technology Overview

The USITC advances its technical infrastructure and support by monitoring and maturing cybersecurity, infrastructure, and software development programs. This is achieved through the timely implementation of relevant guidance, technical advancements, and best business practices. We continue to enhance our cybersecurity program by staying current with mandates and directives, vigorously tracking and remediating vulnerabilities, and actively identifying and defending against threat and attack vectors utilizing in-house and third-party expertise. Life-cycle replacements of critical network and server infrastructure will continue in FY 2027, as we continuously replace legacy hardware with more efficient variants to not only improve performance and reliability but to also continue to reduce our footprint.

In FY 2027, we anticipate follow-on enhancements to the initial release of the completely reengineered HTS application which is scheduled for release by the end of FY 2026. This web-based application is the Commission's most accessed system, initiating over 16.7 million user sessions in FY 2025.

Also during FY 2027, we will continue strengthening our IT security posture by investing in new technologies, processes, and capabilities. In addition to the previously noted activities, planned improvements include the following:

- refining and maturing security tools
- modernizing the vulnerability management infrastructure
- implementing additional governance risk and compliance tools

- automating cloud compliance activities
- continuing data risk management using data classification schemes
- ongoing participation in the Cybersecurity and Infrastructure Security Agency's Continuous Diagnostics and Mitigation program
- continued use of bug bounty and penetration testing programs to validate and enhance security
- identifying, analyzing, and implementing AI opportunities to improve processes.

Remote and Cloud Computing

USITC maintains a secure and modern remote access solution, ensuring high availability and accessibility. By operating a remote datacenter with multiple service providers and a mix of cloud- and locally based technologies, USITC exceeds its availability metric across all core applications and systems. We will continue to evaluate the need for additional cloud compute capabilities to enhance redundancy and performance for remote and local users.

The Commission continues to implement non-proprietary development techniques and technologies to ensure flexibility and portability in cloud deployments, while maintaining the necessary levels of IT security. In FY 2027, we expect to continue utilizing a hybrid, cloud-based architecture to continuously improve the availability and accessibility of our systems, increase our redundancy, enhance security, and increase the portability of systems by reducing our dependence on physical datacenters.

Risk Management and Planning

We have a well-developed enterprise risk management (ERM) process to establish, maintain, monitor, evaluate, and report on agency risks. The process is led by the Director of the Office of Internal Control and Risk Management, who reports to the Chief Financial Officer. ERM is an integral part of all strategic planning, performance management, budget, IT, and human capital functions and activities. As part of this effort, we maintain an ERM database, which supports categorizing, documenting, and evaluating risks to the agency.

Management performs ongoing assessments to identify, manage, and update the risks in the ERM database. Our risk profile is developed from the database and ranks risks from an agency-wide perspective. The profile is discussed, prioritized, and reviewed by the Commission's Performance Management and Strategic Planning Committee. The primary purpose of the risk profile is to

assess how the risks we face from operations, mission-support activities, and external factors influence our ability to meet the agency's mission and achieve its performance goals.

The Office of Management and Budget (OMB) provides agencies with guidance related to risk management in certain specialized areas, including cybersecurity. OMB directs agencies to assess their cybersecurity risk, to manage the cybersecurity component of enterprise risk, and to adopt the National Institute of Standards and Technology's Framework for Improving Critical Infrastructure Cybersecurity. The Commission manages risk in a way that is commensurate with the magnitude of the harm that would result from unauthorized access, use, disclosure, disruption, modification, or destruction of a federal information system or federal information. The Commission complies with all cybersecurity reporting requirements.

Each quarter, agency leaders and senior staff review progress on our strategic and management objectives and identify and discuss enterprise risks. These reviews, along with the evidence related to specific performance goals and associated risks identified by our managers, inform the development of our Annual Performance Plan and Congressional Budget Justification. We continue to evaluate and implement improvements in our planning and ERM processes to make more effective use of the data we collect.

Good Accounting Obligation in Government Act

The Good Accounting Obligation in Government Act requires each agency to include in its annual budget justification a report that lists each public recommendation issued by the Government Accountability Office (GAO) and the agency's Office of Inspector General (OIG) that has remained unimplemented for one year or more from the annual budget justification submission date. The Commission does not have any open GAO recommendations. The Commission also does not have any OIG recommendations that have been open for more than one year.

Publications Proposed for Elimination

The Commission has identified two publications that it has proposed for elimination or streamlining in response to requirements of the GPRM Modernization Act of 2010. Specifically, the Commission has requested elimination of the requirement found in 19 U.S.C. § 3204 to provide the *Andean Trade Preference Act: Impact on U.S. Industries and Consumers and on Drug Crop Eradication and Crop Substitution* report. The requirement is outdated because the President's authority to provide trade preferences under the

Act expired in 2013 and has not been extended by Congress. Thus, none of the four eligible countries has participated in the program since 2013. As a result, there is no continued benefit to issuing the report.

Similarly, the Commission requested that Congress streamline the production of the HTS by eliminating the requirement at 19 U.S.C. § 3007(a) to print a hard copy of it. The statute requires the Commission to prepare a hard-copy version of the HTS (the current version exceeds 4,400 pages) and authorizes it to publish an electronic version. Users of the HTS rely almost exclusively on the electronic version. The requirement of a hard copy duplicates the electronic version. In addition, the hard-copy version becomes outdated soon after issuance due to the numerous modifications, and it therefore provides little benefit to the public.

Preparing for Future of Work and Physical Space Reconfiguration

From late-FY 2024 to mid-FY 2025, the USITC coordinated with the General Services Administration (GSA) to assess the agency's office space needs and determine any potential to reduce its real estate footprint. This assessment led to the development of an updated micro program of requirements and housing plan based on the current GSA space standards, which could be utilized for either relocation or a reduction in office space within the Commission's current headquarters building.

To perform our statutory functions in support of the America First Trade Policy, the USITC requires many customized spaces within our headquarters building, including multiple courtrooms necessary for trials conducted by the Commission's administrative law judges, a hearing room for Commission proceedings (also used by the Office of the U.S. Trade Representative), and a Sensitive Compartmented Information Facility. Spaces meeting these requirements are expensive and time-consuming to relocate or renovate within a building and market research has demonstrated, are typically not included in comparable commercial office space. The anticipated costs associated with reducing USITC's real estate footprint to meet the current GSA space standards through either downsizing in the current location or relocating to a new building and adapting it to meet the customized spaces needed for the Commission to fulfill its mission would be significant and far exceed any short-term benefits of reduced rent payments under the current lease, which will expire in 2032. Therefore, USITC is not proposing to downsize in connection with its FY 2027 budget request.

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Appropriations Language

Salaries and Expenses

“For necessary expenses of the International Trade Commission, including hire of passenger motor vehicles and services as authorized by section 3109 of title 5, United States Code, and not to exceed \$2,250 for official reception and representation expenses, \$134,000,000, to remain available until expended, of which not less than \$2,096,176 shall be for the Office of Inspector General in carrying out the Inspector General Act of 1978 (5 U.S.C. 401 et seq.).”

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Trade Remedy Investigations

The Commission plays an important role in administering and applying U.S. trade remedy laws by conducting several types of investigative proceedings. These proceedings are adjudicative in nature and focus on allegations that subsidized and dumped imports are injuring a domestic industry; that a surge of imports is injuring a domestic industry; or that imports are infringing domestic intellectual property (IP) rights or are involved in unfair acts that injure or threaten a domestic industry.

Our first strategic goal is to “investigate: conduct efficient and effective investigations” by making them expeditious and transparent and engaging the public, including stakeholders and experts, and collecting relevant data to inform and support investigations. Our enforcement work supports U.S. industries and their workers’ efforts to compete in the United States and in the global economy on a level playing field. In addition, our timely resolution of complaints filed by domestic industries that seek relief against unfairly traded imports under section 337, including complex IP disputes, can be of paramount economic importance to domestic industries, their workers, and their ability to make continued investments in the United States.

Import Injury Investigations

We conduct investigations to determine whether unfairly traded imports cause or threaten material injury to a U.S. industry, or materially retard an industry’s establishment, under Title VII of the Tariff Act of 1930. Under this law, unfair imports can be remedied through antidumping and countervailing duty (AD/CVD) orders imposing duties on the goods in question. The U.S. Department of Commerce (Commerce) issues and administers these orders. We conduct five-year reviews of existing AD/CVD orders to determine whether their revocation would be likely to cause material injury to a U.S. industry to continue or recur. We have independent litigation authority to defend our decisions in appeals to the U.S. Court of International Trade and the U.S. Court of Appeals for the Federal Circuit (Federal Circuit), as well as in proceedings under the United States-Mexico-Canada Agreement (USMCA, formerly NAFTA). We also give extensive assistance to the United States Trade Representative (USTR) in resolving disputes before the World Trade Organization (WTO).

Unfair imports, whether subsidized by a foreign government or “dumped” for sale at prices below the foreign market price or the cost of production, can injure U.S. companies. Congress enacted the AD/CVD laws to give U.S. producers and labor unions a way to

obtain remedies when we find material injury or threat of material injury stemming from imports that Commerce has determined to be unfairly traded. The remedies take the form of AD/CVD duties on imported merchandise equivalent in value to the dumping margin and/or subsidy rate found for foreign producers by Commerce.

Our import injury investigations workload is a function of both new filings and reviews of existing orders. While we can be more certain of the number of reviews in the near future – five to six years – there is substantially more uncertainty in estimating the number of future filings. The Commission’s overall AD/CVD caseload (i.e., new filings plus reviews) continues to fluctuate with an upward trend. In FY 2025, the Commission instituted 91 investigations and reviews (compared to 75 in FY 2024) and completed 89 investigations and reviews (compared to 64 in FY 2024). The five-year average number of total institutions increased from 41 in FY 2015 to 63 in FY 2020 to 69 in FY 2025. The growth in cases instituted per year has been the result of increased filings as well as fewer trade-remedy orders being revoked than being issued, resulting in a stock of orders that continues to drive five-year review proceedings.

The Commission continues to experience high levels of petition filings that began in FY 2015, including a record level in FY 2025, as well as cyclical but upward trending AD/CVD five-year reviews. The average number of petitions doubled from nine in the 10 years preceding FY 2015 to 18 in the 10 years following FY 2015. We instituted 34 reviews of existing AD/CVD orders in FY 2025 and anticipate instituting 45 and 34 in FYs 2026 and 2027, respectively. The five-year average number of review institutions increased from 22 in FY 2015 to 24 in FY 2020 to 35 in FY 2025. In FY 2025, the Commission received one safeguard petition on quartz surface products and anticipates conducting an end-of-relief review on crystalline silicon photovoltaic cells and modules (solar products) and a mid-term review for fine denier polyester staple fibers in FY 2026.

Historically, AD/CVD petitions have covered a broad range of products representing many sectors of the economy. In FY 2025, we instituted a record 27 preliminary-phase investigations covering a wide variety of industries in the U.S. economy. Domestic industries filing petitions in FY 2025 represented a range of products, including consumer/industrial goods, chemicals, intermediate products, minerals, agriculture, and steel related. Most of the investigations covered consumer/industrial goods (8, such as thermoformed molded fiber products, overhead door counterbalance torsion springs, temporary steel fencing, lattice boom crawler cranes, and hardwood and decorative plywood), chemicals (7, such as erythritol, silicon metal, l-lysine, and chromium trioxide), and intermediate products (6, such as hard empty capsules, float glass, chassis and subassemblies, and fiberglass door panels).

Additional investigations covered agricultural products (mushrooms and high purity dissolving pulp), minerals (active anode material and unwrought palladium), and steel-related intermediate products (rebar and freight rail couplers).

In FY 2025, 15 of the 27 petitions filed involved imports from multiple countries, ranging from two to five countries per filing. Petitions involved 24 countries, with China being the predominant import source (included in 14 petitions), and Vietnam and India the next most frequent import source (included in 6 and 5 petitions, respectively). Collectively, AD/CVD investigations resulting from petitions filed in FY 2025 involved about \$40.6 billion in U.S. consumption, \$22.4 billion in imports, and just over 39,000 U.S. production employees. These investigations involved a range of industries such as solar products, float glass, rebar, methylene diphenyl diisocyanate (MDI products), unwrought palladium, hardwood and decorative plywood, and thermoformed molded fiber products.

To conduct import injury investigations and reviews, we assemble multidisciplinary teams that compile information from several sources, including questionnaire responses from domestic and foreign firms, publicly available information, plant tours, testimony at USITC staff conferences and hearings, and legal briefs from parties. Our investigative teams prepare fact-based reports on which the commissioners rely to make their determinations. Interested parties' representatives approved under administrative protective orders (APOs) have access to the information that we examine, including confidential information released under the APO. All hearings are open or available to the public, and public versions of reports, votes, party submissions, and opinions are available on our website, offering timely and useful information to companies and individuals.

Our investigative processes are fair and transparent. We ensure that investigative records are complete and contain information from all parties so the commissioners can make sound and objective determinations that can withstand judicial scrutiny. We continually seek to upgrade our processes in terms of speed, efficiency, and technical soundness. In FY 2023, the Commission completed development and rollout of the Investigations Database System, or IDS, which provides more complete, timely, and accessible investigative information across all major Commission mission areas, including import injury investigative information. And in FY 2025, the Commission continued efficiency and improvement efforts by developing and implementing version 2 of IDS, substantially increasing its functionality and utility.

In FY 2025, we reached out to import-injury mission area stakeholders to discuss investigative processes and procedures, and to get feedback regarding ongoing efforts. Representatives across Commission import-injury mission offices met with representatives

of the Customs and International Trade Bar Association (CITBA) to identify and discuss key areas for feedback and improvement. As a result of this communication effort, we leveraged IDS to develop a report on scheduled institution of five-year reviews. The report followed engagement and requests from external stakeholders and provides counsel representing U.S. industries and importers efficient and accurate information on scheduled reviews. Throughout FY 2025, we continued to make publicly available investigations-related content on our website, and despite the very high workload, the Commission met 100 percent of deadlines set by statute for agency determinations and reports.

Another significant portion of our workload in the import injury area is defending our determinations in response to domestic litigation challenging them. This litigation is conducted at the U.S. Court of International Trade (CIT), the Federal Circuit, and binational review panels under NAFTA (or under USMCA for cases initiated after July 1, 2020). In addition, our staff assists USTR in WTO disputes defending our import injury determinations, challenging injury determinations made by other WTO members that affect U.S. exports, or providing third-party comments on legal issues that are of institutional interest.

A significant share of employee resources in the Office of the General Counsel (OGC) is dedicated to defending Commission Title VII determinations in domestic courts, as well as before WTO and USMCA dispute settlement panels. The Commission also assists USTR in defending U.S. safeguard determinations in WTO dispute settlement proceedings. In FY 2025, there were 21 new appeals related to Commission Title VII proceedings to the CIT, two new appeals to the Federal Circuit, and one new appeal to a USMCA dispute settlement panel. At the close of FY 2025, there were 33 Commission import injury cases pending in the CIT, nine pending cases in the Federal Circuit, and two pending cases before a USMCA dispute settlement panel. During FY 2025, there were no active disputes involving a challenge to a Commission antidumping determination pending at the WTO but two disputes have been appealed to the Appellate Body.

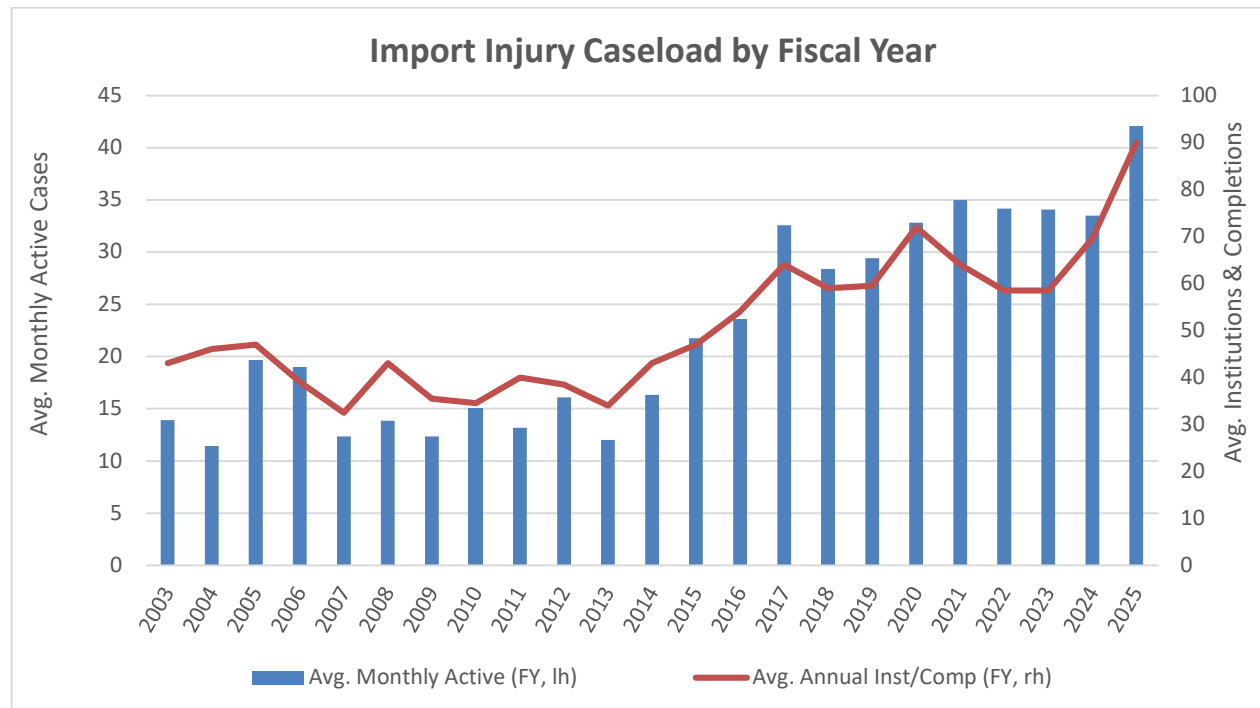
While appeals can be even harder to project than caseload, for FYs 2026 and 2027, we project that the number of new appeals challenging our import injury determinations will continue to remain high or increase, reflecting the increased number of new petitions filed in FYs 2024 and 2025, as well as the number of active investigations and five-year reviews that were recently completed in FY 2025 or will be completed in FY 2026.

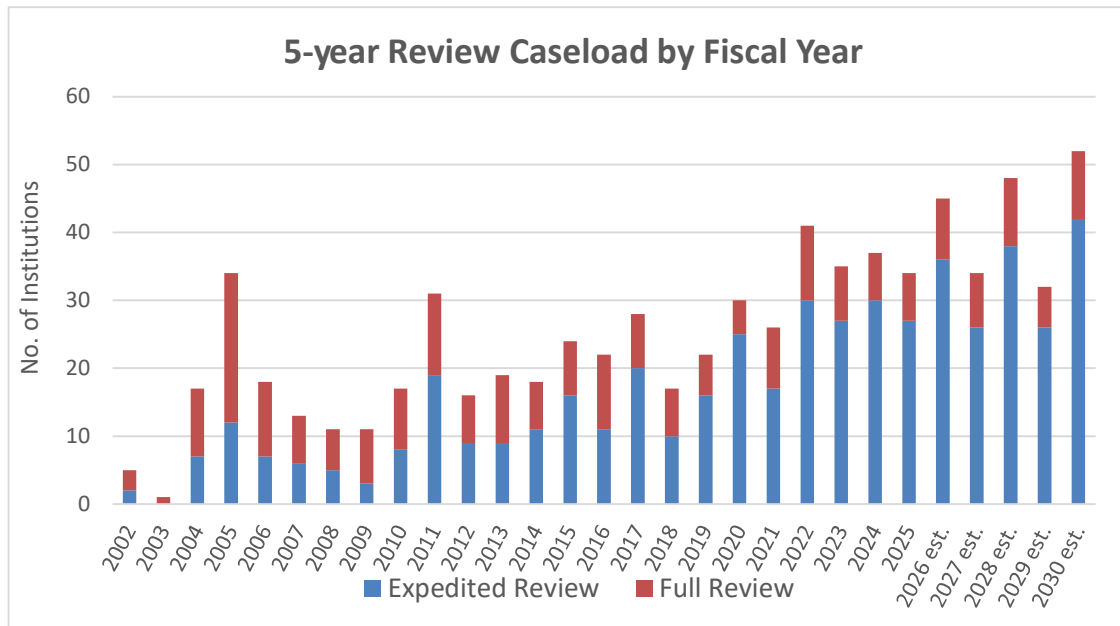
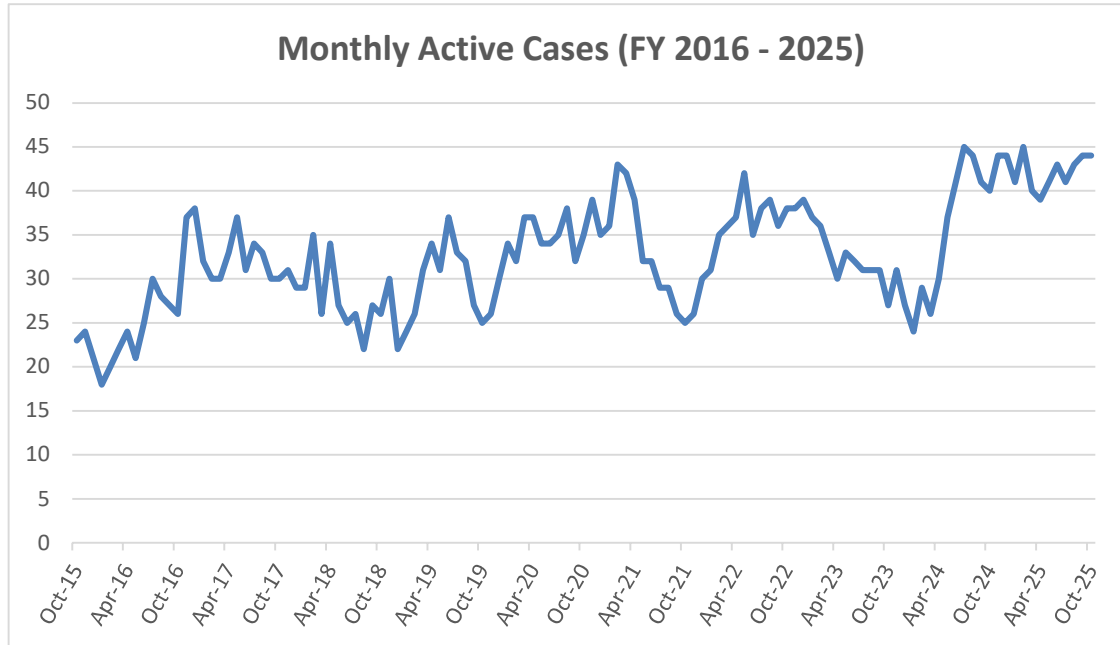
Trends in the investigative caseload and caseload estimates for FYs 2026 and 2027 are shown below.

Import Injury Investigations Caseload

Instituted and Completed Investigations

	Instituted							Completed						
	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Preliminary Title VII	11	10	10	22	27	17	17	12	10	10	21	26	20	17
Final Title VII	23	14	6	13	30	23	17	25	13	9	10	22	27	19
Other	1	0	2	3	0	2	2	2	1	1	4	0	2	2
Full Review	9	11	8	7	3	9	8	5	6	11	9	6	7	9
Expedited Review	17	30	27	30	31	36	26	23	22	33	20	35	32	31
Total	61	65	53	75	91	87	70	67	52	64	64	89	88	78

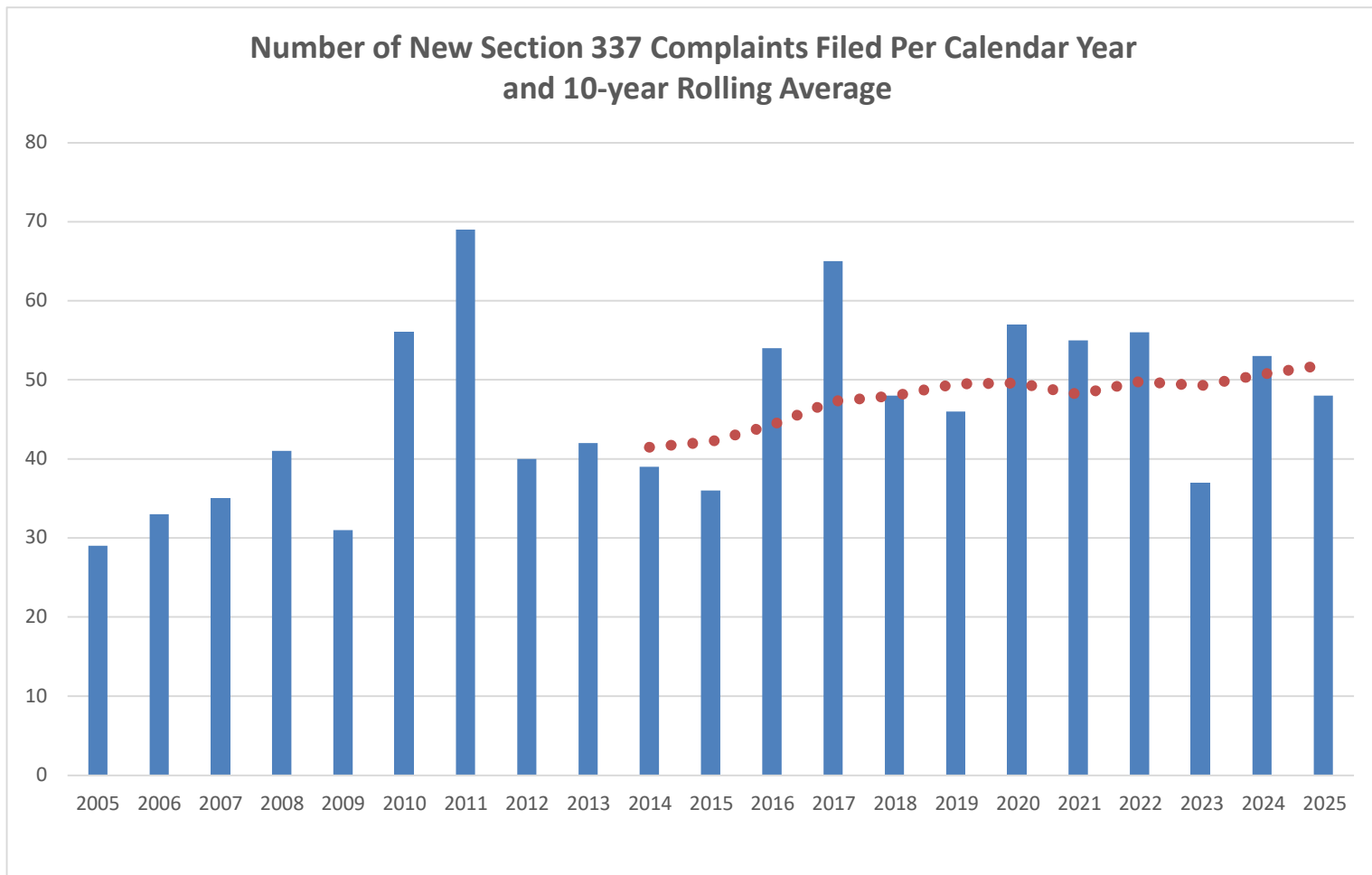




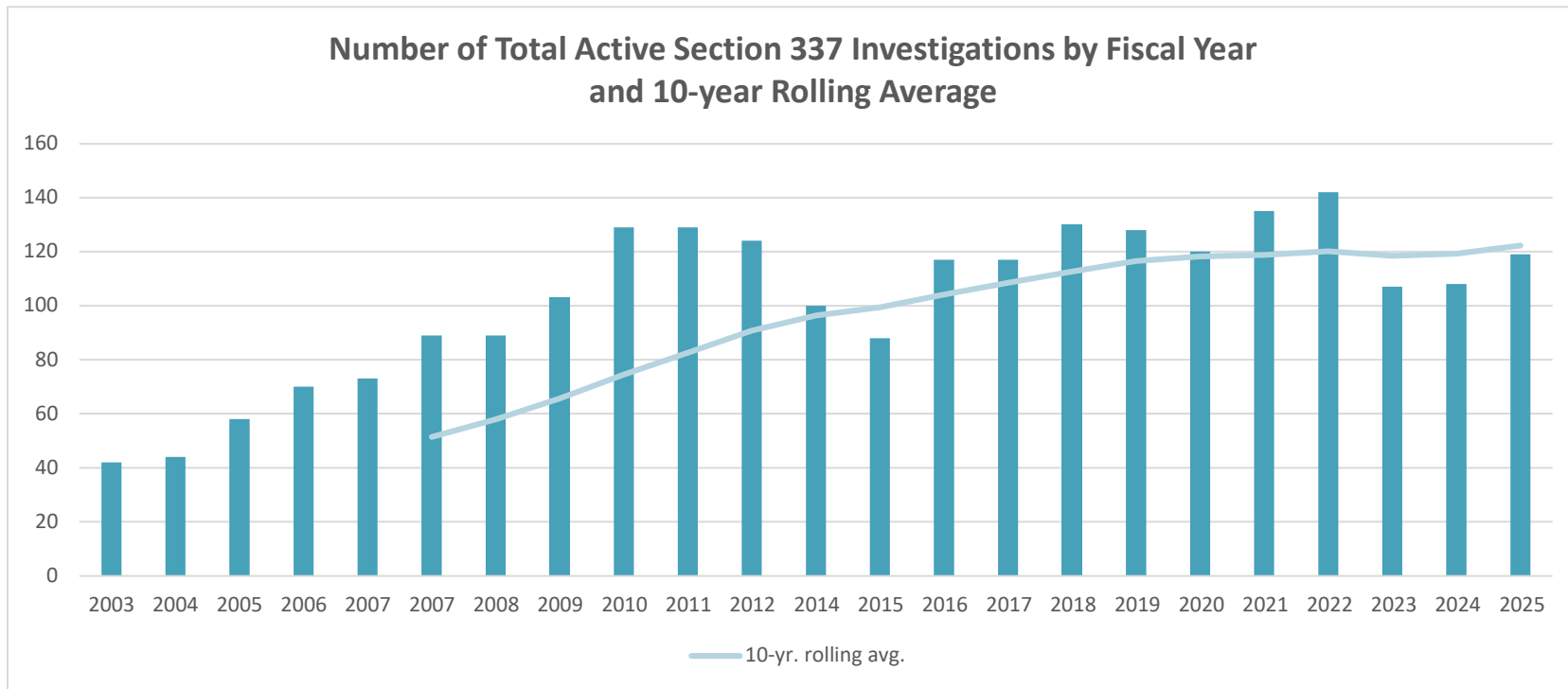
Unfair Import Investigations

The Commission investigates unfair methods of competition and unfair acts involving imported articles under section 337 of the Tariff Act of 1930. These investigations are brought by U.S. industries that seek to obtain timely relief against unfair competition from imports, including imports that infringe their U.S. statutory IP rights, primarily patent rights, or imports that benefit from unfair methods of competition and unfair acts that injure U.S. industries. The primary relief available under section 337 is exclusion of goods at the border. Moreover, IP is a key driver of the U.S. economy and a critical element in U.S. competitiveness, and the Commission has earned a reputation for providing fair, timely, and expert adjudication of complex IP disputes. As a result, many IP rights holders, particularly in industries where the product life cycle is short, have come to see the Commission as a vital forum for the redress of IP infringement. This interest is reflected in the number of complaints requesting relief against unfair imports that we have received in recent years and in reporting indicating that nearly a quarter of all patent trials held in the United States are conducted at the Commission.

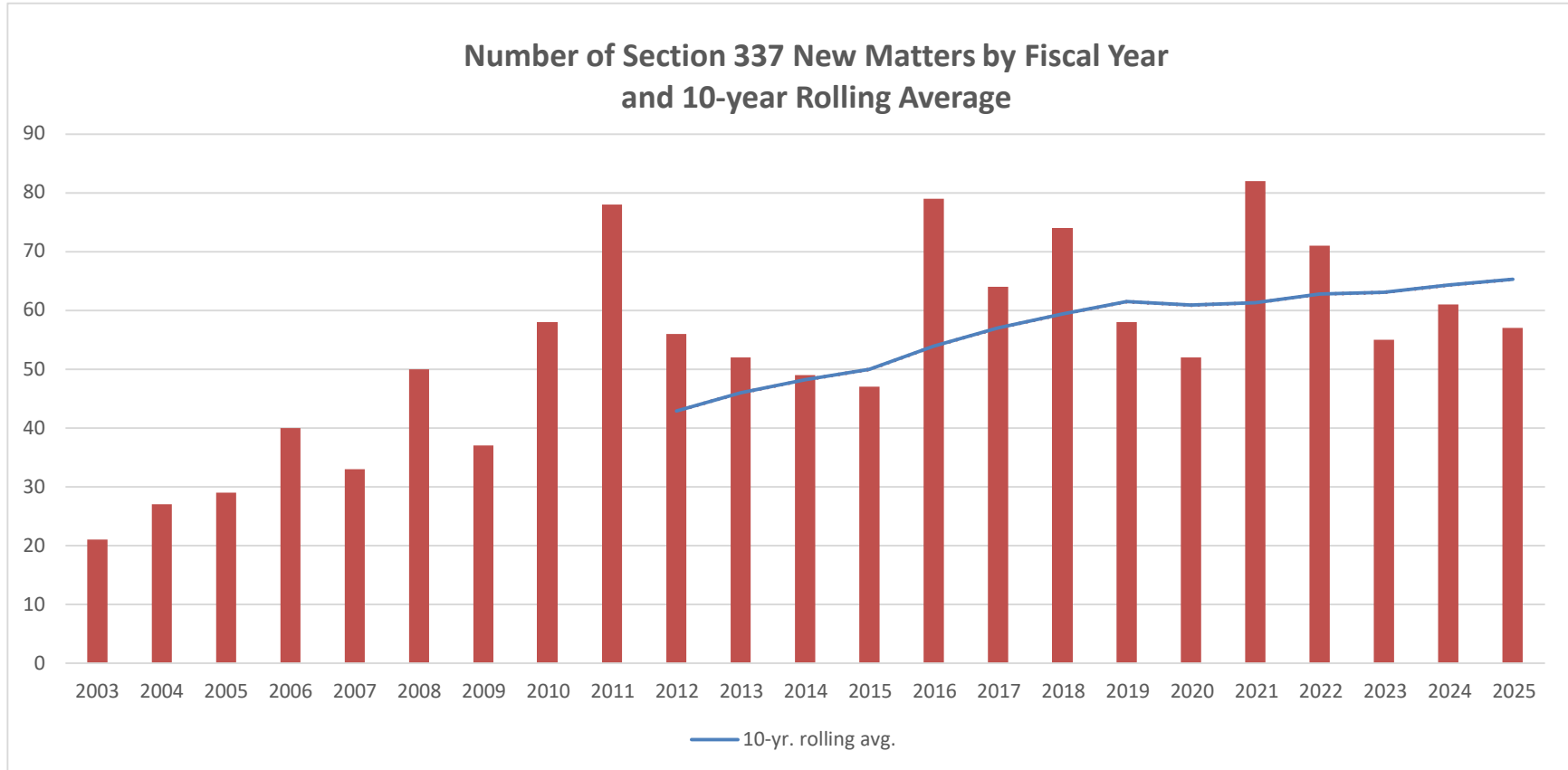
For over two decades, there has been an overall upward trend in new complaints filed year over year (as illustrated in the chart below). In 2025, the number of new complainants remained steady. However, we expect a slight increase in new filings in FYs 2026 and 2027. The number of complaints filed provides an indication of the level of work flowing into the agency. In addition to the work of our investigations instituted to evaluate and decide the claims raised in the complaints, under section 337, prior to institution of an investigation, all complaints must be examined for (1) sufficiency and compliance with the applicable rules to determine whether they were properly filed; (2) identification of sources of relevant information; and (3) assurance of the probable availability of evidence therein. This involves a substantial amount of work by the Commission and its Office of Unfair Import Investigations.



Another metric that reflects our current workload trends is the number of active investigations by fiscal year. This number reveals how many section 337 investigations are active at the agency, not just the number of incoming complaints illustrated in the previous graph. The active investigation number is influenced by the incoming number of investigations and ancillary proceedings, the settlement rate, and any delays in reaching a final determination, whether internal or external. As the chart below demonstrates, the number of overall active investigations in FY 2025 was higher than that of FY 2024. Thus, the ten-year rolling average rose slightly, continuing the overall upward trend over the last 10 years.



In FY 2025, the settlement rate of section 337 investigations (i.e., the rate at which private parties settled their disputes or complaints were withdrawn) rose slightly, to 45 percent, up from 37.5 percent in FY 2024. While settlement rates did not reach their all-time low of 34 percent in FY 2020, this continued level of settlements indicates that investigations are less likely to end in a settlement, consent order, or a complaint being withdrawn, meaning investigations are more likely to continue being litigated in subsequent years. As a result, the investigations instituted in FY 2025 will continue to have an impact on workload in FYs 2026 and 2027 as the Commission institutes new investigations and ancillary matters each year. As the table below indicates, the trend of these institutions and their effect on the active caseload in subsequent years continues to increase over time, even in years in which the number of new matters instituted declined. These new investigations add to the overall number of active investigations.



The average length of an investigation completed on the merits in FY 2025 decreased significantly to 16.3 months, from 18 months in FY 2024 and 17.5 months in FY 2023. However, for FY 2026 the average length of investigations is increasing, owing to the effects of the FY 2026 lapse in appropriations and staffing constraints. The Commission conducts all evidentiary hearings in person but will use its FedRAMP-certified video teleconferencing platform to secure testimony of witnesses who are unable to attend a hearing in person, e.g., due to illness. The Commission also uses its video teleconferencing platform for many other types of hearings, such as claim construction and case management conferences to reduce expense to the private parties.

Section 337 remains an important tool to protect the domestic industries in the United States, including protecting the IP rights

of those industries. The U.S. Patent and Trademark Office found that industries that intensely use IP account for nearly 41 percent of U.S. GDP and 33 percent of all U.S. employment.² Domestic industries typically seek relief against unfair imports that infringe their U.S. patent rights. There has also been a consistent number of domestic industries that have sought relief against imports that injure their industries by reason of unfair acts and methods of competition other than patent infringement, including claims based on trademarks, trade dress, false advertising, false designation of origin, and trade secret misappropriation. In particular, a significant percentage of our non-patent investigations involve the protection of trade secrets, which has been a focus in both the executive and legislative branches in recent years.

The spectrum of products and IP rights at issue in section 337 investigations is quite broad. There continues to be a steady number of investigations seeking general exclusion orders for consumer goods. The docket has included many investigations involving the importation of sophisticated electronic devices, such as smartphones, tablets, laptops, memory devices, and other 5G devices and this will likely continue. In FY 2025, we also adjudicated investigations involving pharmaceuticals and medical devices, manufacturing and transportation-related products, and products such as eye cosmetics, hydroderm abrasion systems, storage containers, solar cells, flash spun non-woven materials, crafting machines, injection molding machines, ceiling fans, and furniture.

There is a substantial overlap between the industries that dominate our IP docket and the industries found in a Department of Commerce study to be the most IP-intensive in the United States.³ The study found that these IP-intensive industries represent 29.8 percent of all jobs in the United States; that wages of private sector workers in IP-intensive industries were 46 percent higher than those of workers in non-IP-intensive industries; and that wages for workers in patent-intensive industries were over 74 percent higher than those of workers in non-IP-intensive industries. Our IP enforcement efforts to stop unfair imports at the border therefore contribute to strengthening U.S. industries and their workers and enabling them to continue to invest in the United States.

To adjudicate section 337 investigations, our administrative law judges (ALJs), in accordance with the Administrative Procedure Act, conduct evidentiary hearings, issue initial determinations, and facilitate dispute settlement. Our Office of Unfair Import

² U.S. Patent and Trademark Office, Intellectual property and the U.S. economy: Third edition, 13 (2021).

³ U.S. Patent and Trademark Office, Intellectual property and the U.S. economy: Third edition, 15-19 (2021); U.S. Department of Commerce, Intellectual Property and the U.S. Economy: 2016 Update, 2016.

Investigations reviews complaints before investigations are instituted, advises the commissioners on institution determinations, participates (when appropriate) as an independent investigator to the proceedings, and aids in facilitating settlements. The ALJs' initial determinations are subject to review by the commissioners, and the Commission's final determinations in section 337 investigations can be appealed to the U.S. Court of Appeals for the Federal Circuit. Our Office of the General Counsel provides advice to the commissioners during each investigation and defends the agency's final decision during any subsequent appeals. Each of these offices employs attorneys with technical backgrounds who have spent years developing expertise not only in patent and competition law, but also in the law of section 337.

As noted above, one of our strategic goals is to conduct efficient and effective investigations. The Commission aims to make unfair import investigations expeditious and transparent. It also seeks to engage the public, including stakeholders and experts, and to collect all relevant data to inform and support investigations. The timely resolution of section 337 disputes is particularly important to patent holders because the duration of patents is limited. Speed is even more crucial when disputes involve high-technology products that tend to have short commercial life cycles. Thus, in accordance with congressional intent, it is important to conclude our unfair import-based investigations as quickly as possible. This goal has been challenging in recent years because of the volume and complexity of investigations. We continue to examine various options for shortening the length of investigations. For instance, we have implemented rules under which, in selected investigations, the Commission may identify a potentially case-dispositive issue at institution for the ALJ to adjudicate within the first 100 days of the investigation. Since inception, fourteen investigations have been in this program. All but two of these investigations (or 85 percent) were completed prior to their initial target date. The existence of this program has also led to more fulsome complaints.

The Commission also introduced rules regarding the severing of investigations with unrelated patents and technologies into multiple investigations to divide a larger, more complex investigation into more manageable investigations. The Commission has introduced a new pilot whereby an ALJ may identify an issue to resolve early in an investigation, take evidence on that issue, and then issue an interim initial determination. Two investigations have used this new pilot. The purpose of these rules is to help us meet our strategic goal of issuing timely decisions while providing due process to litigants, allowing us to build sufficient factual records and maintain quality decision making.

We are also assessing ways to improve the effectiveness of the remedial orders that we issue. One issue frequently raised in this area is whether new and redesigned products are covered by an existing Commission exclusion order, cease and desist order, or

consent order. U.S. importers, would-be importers, and IP rights holders have all expressed concern in recent years about how they can obtain timely, transparent, and binding decisions in this regard. In response, in FY 2015 we announced a pilot program to test the use of expedited modification and advisory opinion procedures to evaluate and rule on redesigned and new products that are potentially covered by our remedial orders. While modification and advisory opinion procedures have been available for years, we have set performance goals to streamline them to better meet the needs of those who may be affected by remedial orders. We have tested this pilot in 22 investigations since FY 2016. Overall, this pilot decreased the length of time for these redesign proceedings.

We continue to improve both our ability to report data involving section 337 investigations and the transparency of our data to the public. In FY 2023, we launched IDS, a searchable database providing data on investigations instituted since FY 2009. Accessible from our website, IDS offers members of the public easy access to information on scheduling, parties involved, patents at issue and unfair acts alleged, staff assigned, disposition of the investigation, and any appeals. IDS assists the Commission in managing its investigation data. We use information captured in IDS to generate statistics to respond to internal and external inquiries about section 337. IDS continues to improve the process of capturing additional information and automating some of our reporting processes. In FY 2024, we developed requirements to improve IDS, and the second version aims to be completed in FY 2026.

We continue to encourage and support settlement of cases by the parties involved in our section 337 investigations in several ways. These include ALJs ordering settlement discussions throughout the investigation; some ALJs requiring formal mediation; investigative attorneys fostering settlement efforts in those investigations in which they participate; and all parties having access to our mediation program. While our settlement rate remains low, settlements reduce the number of investigations in which we must make final determinations and conserve the resources of both litigants and the agency.

Office of the General Counsel's Appellate Litigation Stemming from Unfair Import Investigations (Section 337)

Status	FY 2019 Actual	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate
Number of appeals pending end of FY	17	26	17	24	23	22	25	20

A significant share of employee resources in the Office of the General Counsel (OGC) is dedicated to appellate litigation pending at

the U.S. Court of Appeals for the Federal Circuit stemming from section 337 investigations. The Office of the General Counsel is typically successful in defending the Commission’s determinations before the Federal Circuit. The table above displays the number of pending appeals at the end of each fiscal year, FYs 2019-26. This is only a snapshot of the appellate litigation challenging section 337 determinations handled by OGC, and it does not capture the full number of active cases handled during any particular year (While many cases last beyond a single fiscal year, others open and close during the same fiscal year and are not reflected). For example, during FY 2025, OGC handled 39 active section 337 litigation appellate matters all before the Federal Circuit. OGC also handled two district court litigations involving subpoena enforcement and assisted the Department of Justice in two other section 337-related litigations at the Supreme Court of the United States.

Caseload estimates for FYs 2026 and 2027 are shown below.

Unfair Import Investigations Caseload

Instituted and Completed Original and Ancillary Investigations

Status	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Instituted	82	71	55	61	57	65	65
Completed	64	90	60	46	69	60	60

Analysis and Information on Trade and Competitiveness

To fulfill our mission, we must respond with timely, objective, sound information and analysis when federal policymakers request us to help them in negotiating trade agreements and evaluating the effect of legislation or other trade policy actions on the U.S. economy and industry competitiveness.

We have statutory responsibilities to provide information at our disposal to Congress and the President, who has delegated the President's request authority to the United States Trade Representative (USTR). In response to these policymakers' requests, or on our own initiative, we supply independent industry and economic research and analysis on numerous topics, both through factfinding investigations and trade policy support (also referred to as technical assistance). Factfinding investigations are in-depth investigations, typically lasting a year and culminating in publicly released reports, while technical assistance typically involves more discrete, focused requests with shorter turnarounds. Our industry-specific competitiveness and economic analysis is widely considered to be expert and objective, and it is routinely cited by parties representing all sides in trade policy debates. Our ability to collect, compile, and assess trade and economic data is widely sought after by policymakers who rely on us for authoritative information to support informed decision making.

To ensure that we develop and maintain the technical expertise needed for this work, we also identify and research priority areas in international trade, industry competitiveness, and the U.S. and global economies. Our ability to continue to develop and refine our capabilities in anticipation of future requests better ensures that the Commission has the expertise and the analytical tools ready to be responsive to requests from the Administration and Congress, often on short timelines.

Industry and Economic Analysis

We conduct factfinding investigations at the request of the House Committee on Ways and Means (HWM), the Senate Committee on Finance (SFC), the President, and by delegation, the U.S. Trade Representative (USTR), or Congress. The Commission may also self-initiate factfinding investigations. These investigations encompass a wide range of international trade and competitiveness issues of interest to U.S. policymakers and that affect firms, industries, workers, and consumers. Authority for most of our investigations is granted by section 332 of the Tariff Act of 1930, but also by various implementation statutes for specific trade

agreements and by several general trade statutes. Except for requested confidential studies, we make available our factfinding reports freely to the public.

Our investigations in most cases focus on issues that affect U.S. trade or important parts of the U.S. economy including U.S. industries, firms, and workers. Policymakers rely on us to produce expert analysis of the global competitiveness of U.S. industries and U.S. trade with specific countries or regions. Policymakers also rely on us to provide expert information about policy changes that may affect, or have affected, the economy as a whole or certain sectors or industries. This information provides insight into U.S. trade agreements (e.g., USMCA) and U.S. competitiveness and activities in industries impacted by foreign policies (e.g., rice, steel, and aluminum). Investigations completed in FY 2025 include:

- *USMCA Automotive Rules of Origin: Economic Impact and Operation, 2025 Report*, Inv. No. 332-600 (Legislation)
- *Greenhouse Gas Emissions Intensities of the U.S. Steel and Aluminum Industries at the Product Level*, Inv. No. 332-598 (Requested by USTR)
- *Rice: Global Competitiveness and Impacts on Trade and the U.S. Industry*, Inv. No. 332-603 (Requested by HWM)
- *Recent Trends in U.S. Services Trade: 2025 Annual Report*, Inv. No. 332-605 (Self-initiated)
- *Caribbean Basin Economic Recovery Act: Impact on U.S. Industries and Consumers and on Beneficiary Countries, Twenty-seventh Report, 2023–2024*, Inv. No. 332-606 (Legislation)
- *The Year in Trade 2024: Operation of the Trade Agreements Program, 76th Report*, Inv. No. 163-004 (Legislation)

Moreover, requests often require us to develop or apply new analytic methods; collect and analyze unique primary data obtained through extensive multi-sector questionnaires or other outreach; or research and analyze new industries, competitive conditions, or trade issues.

In FY 2025, in addition to its work on factfinding investigations, the Commission provided substantial technical assistance on a variety of topics, including with respect to America First Trade Policy initiatives and analysis of tariff and non-tariff measures. Providing this support required us to identify foreign trade barriers and develop new models to estimate the impact of tariffs and nontariff barriers on U.S. industries and on national economic conditions. Maintaining support for the wide range of requests we received, often delivered under tight timeframes, required a record amount of resources devoted to technical assistance in FY 2025.

We draw on knowledge gained from our factfinding investigations and capacity building research to respond to expedited requests for technical expertise and data that trade policymakers can use to inform the development of U.S. international trade policy. This trade policy support, provided under section 332 of the Tariff Act of 1930, includes:

- providing information and analysis on current issues related to trade and competitiveness
- providing technical comments on draft legislation
- preparing draft tariff legislation and annexes for presidential proclamations, memoranda, executive orders, and final decisions by various agencies
- providing information and analysis in briefings and meetings
- temporarily assigning (i.e., detailing) Commission staff to our oversight committees and the USTR
- assisting trade delegations, negotiating teams, and USTR-led litigation teams in international dispute settlement forums.

In addition to our factfinding investigations and provision of technical assistance, our staff continued in FY 2025 to refine their expertise and analytical tools to anticipate and address new areas of economic and industry analysis. Such preparatory work expands our expertise so that we continue to be able to respond efficiently and effectively to requests from the Administration and Congress for investigations and technical assistance on trade and competitiveness matters, while also contributing to our work in import injury cases, tariff schedule maintenance, and trade policy support. These high-interest areas tend to require information and tools that are not readily available. Moreover, such work often requires significant staff effort to refine existing analytic tools or develop new ones. Our research priorities have kept us at the forefront of emerging analytic areas, such as evaluating risks and vulnerabilities in global supply chains; assessing the effects of trade and trade imbalances on U.S. industries and workers; quantifying a wider variety of nontariff measures and nontariff provisions in U.S. agreements; vulnerable digital infrastructure; critical minerals; and evaluating the impacts of government policies and regulations on trade and investment in specific industries. Consistent dedication of resources to support such work is needed to maintain the world-class quality of our work products. We maintain active dissemination of our research papers and databases to promote transparency and get feedback on our approaches.

To respond to these requests from Congress and the Administration for factfinding investigations and technical assistance efficiently and effectively, we must recruit, develop, and maintain staff with a high level of expertise in industry, regional, and economic matters. Skilled personnel are our single most important resource and account for most of our budget request. Staff

research and external communication and collaboration are vital to honing staff skills and developing information and analytic tools for use in responding to requests. This engagement offers us an important forum for external technical review of new analytic approaches and frequently suggests new, relevant areas of potential interest. Staff travel is necessary to share and gather knowledge from domestic and international experts and to conduct critical field research for investigations.

Our FY 2027 budget request is designed to enable us to continue to invest in both our human capital and other resources to ensure that we can provide high-quality trade- and competitiveness-related analysis and information to policymakers in both the executive and legislative branches. As a first priority, we invest in hiring personnel with skills in areas of high statutory workload and key areas of interest to our requesters at USTR, Senate Finance Committee, and the House Ways and Means Committee. In addition, we invest funds to ensure that we can respond efficiently and effectively to requests from Congress and the Administration through the continuous acquisition, development, and improvement of information resources, analytic tools, and research approaches, including survey methods and statistical, econometric, and simulation analyses. Funds for this are primarily spent on acquiring or developing databases, expert consulting services, and specialized software. Staff collaborates with outside experts to develop models and databases so that we can better estimate the effects of foreign trade restrictions and the impact of policies on U.S. workers, industries and the broader macroeconomy.

Workload Expectations in FYs 2026 and 2027

External events that impact U.S. international trade and domestic competitiveness shape our requestors' needs and interests. Consequently, the nature, timing, and complexity of requests are unpredictable and lead to wide variations in resources required to complete them. Resource needs depend on such factors as the state of global competition in specific sectors or with certain trading partners, emerging interests of policymakers in the Administration and Congress, the scope and scale of policymakers' requests, the level of public information available related to the request, and whether requests require the development of new analytical tools or industry surveys. The interplay of these factors and their uncertainty make accurate forecasting of future workloads challenging. For example, recent factfinding investigations required development of new global economic models (Rice), updating of previous models (USMCA Automotive Rules of Origin), and surveys (Greenhouse Gas Emissions and USMCA Automotive Rules of Origin). The Commission also engages in extensive outreach to U.S. industry to assess competitive conditions (Nonfat Milk Solids). These requirements and engagement expand the level of complexity of 332 investigations and the staff resources required to complete them.

In FYs 2026 and 2027, we expect the workload for technical assistance and factfinding investigations to increase over FY 2025, given the ongoing activity as of the first quarter of FY 2026 and the active trade policy agenda of the executive and legislative branches.

Factfinding investigations ongoing in FY 2026 include:

- *Nonfat Milk Solids: Competitive Conditions for the United States and Major Foreign Suppliers* (Requested by USTR)
- *USMCA Automotive Rules of Origin: Economic Impact and Operation, 2027 Report* (Legislation)
- *Recent Trends in U.S. Services Trade: 2026 Annual Report* (Self-initiated)
- *The Year in Trade 2025* (Legislation)
- *Certain Textile and Apparel Imports from China* (Quarterly report) (HWM)
- *Economic Analysis of Revoking Permanent Normal Trade Relations Treatment for China* (Congressional Request)
- *Impact of Chinese Subsidization and Overcapacity in the Biotechnology Sector* (Congressional Request)

For FYs 2026 and 2027, in addition to these ongoing reports, we anticipate responding to requests or statutory direction for new reports providing unique data and analysis. In addition, in both fiscal years, we expect to administer, develop, and analyze up to two surveys of U.S. companies in factfinding investigations, drawing on a relatively large amount of agency resources. We continue to advance our use of electronic survey tools and methods, which has contributed to productivity gains in recent questionnaire-based investigations.

Requestors also continue to engage us for technical assistance regarding a variety of innovative topics requiring diverse analytical approaches, often with quick turnarounds. In FY 2025, trade policy support requests covered a broad range of topics and issues, including numerous requests supporting the America First Trade Policy and analysis of tariff and non-tariff measures. The variety of these requests underscores the wide scope of current trade policy issues, as well as recognition of our unique capabilities and expertise. Congressional interest in obtaining real-time assistance with draft legislation and emerging policy issues is expected to continue, as is executive branch interest in our support of negotiating teams, dispute panels, section 301 investigations, safeguard remedy analysis, and appearances before the World Trade Organization. Given the active trade agenda, we anticipate that the volume of trade policy support requests for FYs 2026 and 2027 will remain high.

We also have a performance goal for FYs 2026 and FY 2027 of expanding our capability to anticipate and address new areas of economic and industry analysis, to ensure that we can continue to maintain the expertise and analytical tools needed to be responsive to policymakers. To achieve this goal, we will focus our research and data development work on high-interest areas with an emphasis on:

- advancing our modeling capabilities, such as estimating the impact of tariffs and foreign nontariff barriers on specific industries and broader macroeconomic outcomes
- expanding analysis in areas such as the impact of global imbalances on U.S. industries and workers; trade diversion and transshipments; industry competitiveness; and risks and vulnerabilities in U.S. supply chains, with a focus on trade in critical materials and materials
- deepening expertise on provisions in trade agreements and their effects on U.S. trade, industries, and workers
- generating, maintaining, and publishing analytical databases of trade, production, and investment to allow the rapid deployment of data to new requests.

During FY 2025, Commission staff executed multiple industry and economic analysis projects in tandem with other work projects required by statute, such as import injury investigations, trade policy support, and tariff and trade information services.

Trends in the investigative caseload and caseload estimates for FYs 2026 and 2027 are shown below. Although the number of investigations declined in FY 2025, the number of technical assistance requests rose, driven by the increased demand for rapid assistance to support America First Trade Policy initiatives and analysis of tariff and non-tariff measures. Reflecting the increased scope and complexity of recent requests, the hours devoted to investigations and technical assistance requests have risen over time. Hours spent per investigation have risen more than 40 percent over the past five years, and the complexity of technical assistance requests in FY 2025 added to the increase in workload far beyond the absolute increase in number of requests.

Industry and Economic Analysis Investigations Caseload

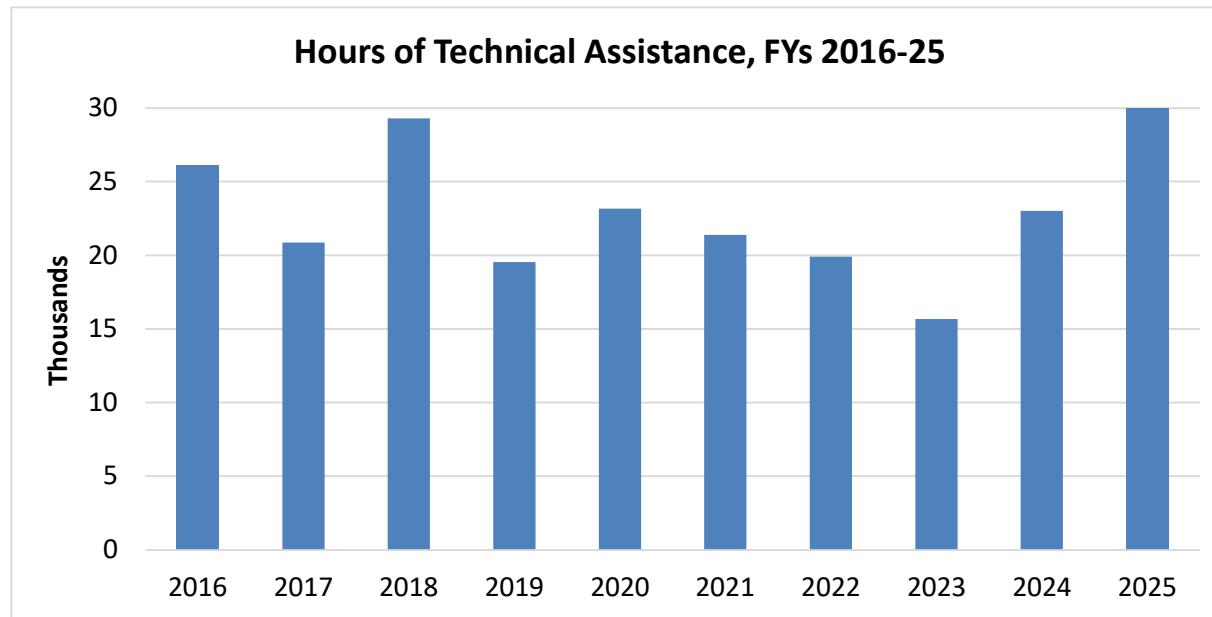
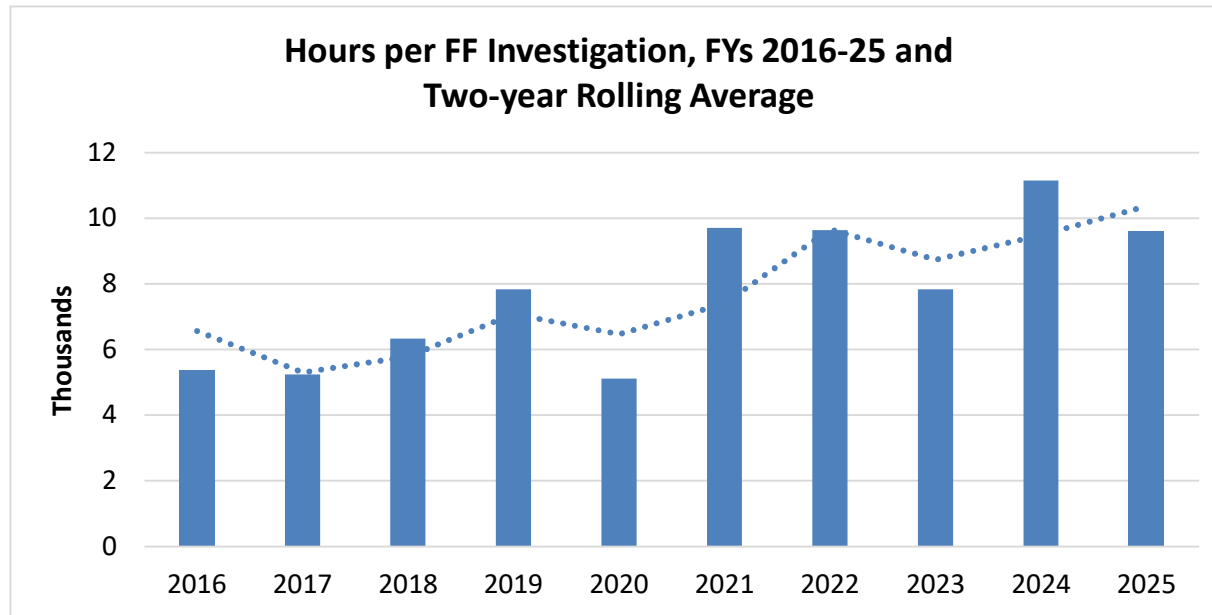
Instituted and Completed Investigations

	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Instituted	9	11	8	6	4	7	9
Completed	9	9	12	7	7	5	9

Note: Instituted and completed totals include both recurring and non-recurring reports.

Completed Technical Assistance Requests

	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Completed	133	143	114	113	120	120	120



Tariff and Trade Information

The USITC maintains and publishes the Harmonized Tariff Schedule of the United States (HTS) under the Tariff Act of 1930 and section 1207 of the Omnibus Trade and Competitiveness Act of 1988 (1988 Act). Its maintenance is essential to accurately and effectively collecting tariffs imposed on goods entering the United States.

As part of our statutory responsibilities, we also chair the U.S. interagency Committee for the Statistical Annotation of Tariff Schedules; conduct investigations under section 1205 of the 1988 Act to propose certain HTS amendments to the President to meet our international obligations; participate in the U.S. delegation to the World Customs Organization (WCO) and World Trade Organization (WTO); and maintain online interactive and in-house databases and an online HTS search tool. Staff expertise in these areas strengthens our investigative work, as well as the trade policy support that we give to the executive and legislative branches.

The Harmonized Tariff Schedule of the United States

Maintaining and ensuring access to an accurate and up-to-date tariff schedule is of critical importance to the U.S. government and the private sector. U.S. Customs and Border Protection (CBP) relies on the HTS for collecting all tariff revenues and fees, which were estimated to be \$198.3 billion assessed on \$3.4 trillion in imports in FY 2025. U.S. importing firms rely on the HTS for accurate information in importing all goods into the country. As noted above, the HTS is the most heavily used tariff schedule in the world based on the volume of trade covered. In FY 2025, the publicly available online system, known as HTS Search, was accessed over 16.7 million times. The HTS underlies the U.S. trade data maintained by the U.S. Census Bureau (Census) and is critical to CBP managing its trade enforcement activities.

In FY 2025, we published the HTS 26 times—a Basic Edition in January 2025, plus 25 revisions over the course of the fiscal year. Prior to FY 2018, the USITC typically published the HTS only two or three times annually.

Number of HTS Publications	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
	Actual	Actual	Actual	Actual	Actual	Actual	Actual
	16	31	18	17	14	10	26

The amount and complexity of the tariff changes implemented with each HTS publication have also grown significantly, particularly in FY 2025, increasing the resources required to maintain the HTS. We also assist the public in understanding the HTS. The public's use of this service has grown quickly in recent years. We experienced an over-twofold increase in HTS Help inquiries in FY 2025 (5,522) compared to FY 2024 (2,298), as visits to the HTS application on the Commission's website jumped from approximately 11 million in FY 2024 to nearly 17 million in FY 2025. We anticipate the volume and complexity of tariff changes will continue to be a salient workload driver in FYs 2026 and 2027.

In addition to our tariff schedule management responsibilities, we chair the interagency Committee for the Statistical Annotation of Tariff Schedules in coordination with CBP and Census. That committee administers statistical reporting numbers for tracking specific goods, if certain criteria are met. We also participate in or lead the U.S. delegation to various committees of the WCO. Continued funding for staff to attend WCO-related meetings is an agency priority as part of U.S. government efforts to ensure that the international tariff nomenclature takes U.S. interests into account. In addition, we provide ongoing support to Congress and the USTR on national, bilateral, plurilateral and multilateral trade programs, on topics affecting the HTS such as trade preference programs, trade agreements, rules of origin, and other tariff actions.

DataWeb

The Commission also provides online trade services, such as the USITC DataWeb. DataWeb is a valuable tool used by our staff, external stakeholders, and the public to organize U.S. import and U.S. export data for analysis. As discussed previously, in FY 2023, the Commission administered a user survey to collect stakeholder feedback to identify requirements to improve the DataWeb. In FY 2024, the Commission worked to develop version 5 of the DataWeb database system. The updated version was deployed in quarter 2 of FY 2025.

Information Technology

General Statement

The Commission continues to leverage the power of information technology (IT) to transform agency operations, improve the customer experience, and safeguard our computer networks and information. Our IT program is critical to achieving our strategic goals and objectives, managing risk, and creating value for our stakeholders. Our FY 2027 budget request of \$134 million includes a very lean \$12 million to operate and maintain existing IT systems, infrastructure, and security; supply the IT resources needed to enhance systems; accommodate cybersecurity requirements; enhance our disaster recovery and continuity of operations capabilities; and maintain hybrid capabilities.

Approximately 90 percent of our IT budget continues to be directly related to maintaining or enhancing the Commission's cybersecurity posture and the maturing of our zero trust-based security strategy. As threat actors become more proficient at locating and attacking technical vulnerabilities, as well as exploiting zero-day vulnerabilities, it is important that even the most mundane IT administration activities continue unimpeded to mount a viable defense and reduce the number of exploitable vulnerabilities, in both hardware and software. These activities include, but are not limited to:

- operations and maintenance of existing systems
- software upgrades and replacement
- lifecycle replacement of key components
- continuous monitoring and reporting
- the utilization of external bug bounty and penetration testing services to meet the requirements of vulnerability disclosure and ground truth testing
- the evaluation, procurement, and implementation of Open Security Controls Assessment Language (OSCAL)-based governance risk and compliance (GRC) tools to support both internal (FISMA Systems) and external (Cloud Systems) compliance monitoring.

The number of reported cybersecurity incidents throughout the government continues to increase as threat actors and

technologies continue to evolve, especially in the exploitation of known and zero-day vulnerabilities. We continue to optimize our level of monitoring and reporting on known exploitable vulnerabilities at both the technical and managerial levels through a combination of staff expertise and automation. We expect to see an increase in the number of mandates issued to address industry- and government-wide security incidents, thus reinforcing the importance of receiving adequate IT funding.

Supporting the Agency's Mission

Our IT budget contains the resources to operate and maintain, as well as develop, modernize, and enhance, a complex suite of essential systems. These systems support our mission areas and the analysis and information that we provide to the public and our stakeholders. In addition to the ongoing maintenance of all systems to ensure their availability, accessibility, and security, specific funding has been requested to address the Harmonized Tariff Schedule of the United States (HTS). Maintaining and ensuring access to an accurate and up-to-date tariff schedule is of critical importance to the U.S. government and private sector. U.S. Customs and Border Protection relies on the HTS in collecting all tariff revenues and U.S. import firms rely on the HTS for accurate information in importing all goods into the country. The HTS application provides a chapter-by-chapter listing of the Harmonized Tariff Schedule and general notes in an electronic format, providing much more flexible search capabilities and greater accessibility than the printed text. HTS user sessions increased again for FY 2025, with over 16.7 million sessions initiated. The HTS application is undergoing a complete reengineering in FY 2026 which includes technical and functional updates. These changes will create a more data-centric application, called the HTS System, that will allow more efficient updating when tariff changes are made and easier usability by the U.S. government and private sector. Once the initial version of the new HTS System is deployed at the end of FY 2026, we anticipate follow-on enhancements and support requests as users become more familiar with the new system.

Information Security

We will continue to strengthen our security posture in FY 2027 by investing in, maintaining, and enhancing technologies, processes, and capabilities in line with mandates and best practices.

Continuous Diagnostics and Mitigation (CDM): USITC worked with the Cybersecurity and Infrastructure Security Agency (CISA) to integrate USITC vulnerability and configuration compliance data into CISA's CDM Capability Shared Service Platform. This platform provides continuous monitoring capabilities for agencies to manage their security posture and provides CISA a means to aggregate

security information across the government. In FY 2027, we will continue to participate in the CDM program.

Security Controls Assessments (SCAs): We continue to perform SCAs on defined local and cloud-based IT systems. An SCA is a due-diligence exercise that uses a comprehensive, documented process to evaluate if an agency's security controls are implemented correctly, operating as intended, and meeting the security requirements for an information system. These assessments are the foundation for an ongoing Authority to Operate (ATO) for each defined system. USITC has a well-defined ATO process for both internal and cloud-based systems which utilizes a continuous monitoring model. In FY 2027, USITC intends to add OSCAL formatting to its ATO processes to support automation and integration with GRC tools. We will continue to maintain ATOs for all mission-essential local and cloud-based systems.

Multifactor Authentication: USITC implemented Homeland Security Presidential Directive 12 (HSPD-12) in FY 2016, enforcing multifactor authentication (i.e., a personal identification verification card plus a personal identification number) for system access. In FY 2027, we will continue using login.gov for public-facing applications as part of our zero-trust architecture.

Data Loss Prevention (DLP): USITC detects the transmission of personally identifiable information (PII) via a scanner system that monitors all network transmissions in real time for certain PII patterns (primarily Social Security numbers) and a forensic network packet recorder that records all network transmissions for later retrieval and analysis. This recorder can also search for arbitrary text patterns such as PII keywords. We have implemented a DLP solution that reviews data in emails sent externally from an internal agency address (i.e., email exfiltration) to prevent email containing PII, such as Social Security numbers and dates of birth, from being transmitted outside the agency's network. This program will continue in FY 2027.

Privacy Program: We will continue to mature our privacy program in FY 2027 by revising privacy policies that define how we manage and protect the PII that we collect, use, and maintain. Maintaining a robust privacy program ensures that we continually comply with all relevant privacy requirements (such as the Privacy Act of 1974, the E-Government Act of 2002, and OMB directives) and minimize the risk of PII disclosure.

Implement Data Risk Management with Data Classification Scheme: In FY 2026, the USITC plans to implement a set of data classification tags for agency files. Building on this work, in FY 2027 the Commission will leverage data classification tags and discovery and reporting capabilities to further restrict access to and storage of controlled unclassified information (CUI). This will

provide the Commission with better, automated auditability and visibility into its data accessibility.

Maintaining Zero Trust: Zero Trust is a strategic initiative designed to prevent data breaches by eliminating trust within a network architecture. In the event of a successful network breach, a threat actor is prevented from moving from asset to asset. While significantly more complicated to implement in many legacy networks, it provides a greater level of protection. As of FY 2024, USITC maintains a zero trust-based architecture in accordance with the pillars defined in Executive Order 14028, *Improving the Nation's Cybersecurity*. In FY 2027, USITC will continue to build on the successes experienced in previous years while maintaining zero trust throughout our network infrastructure.

Vulnerability Management: USITC utilizes a vulnerability patching policy that prioritizes vulnerabilities that have been exploited or have known exploits as documented in the CISA-maintained Known Exploited Vulnerability (KEV) catalog. All federal civilian executive branch agencies are required to remediate vulnerabilities in the KEV catalog within prescribed timeframes. In FY 2027, we will continue to mature our patch processes utilizing scanning and monitoring tools that complement our cyber hygiene services.

Automate Cloud Compliance Activities: In FY 2027, the USITC intends to automate many of its current cloud service provider risk management processes by focusing on measurable and quantifiable authorization metrics and gates by leveraging FedRAMP20x initiatives, OSCAL, existing reporting platforms, and new GRC tools. This initiative has numerous external dependencies we expect to be resolved by FY 2027.

Digital Systems Modernization

All executive branch agencies are required to improve their digital services and make them more accessible to all users. We consistently review our publicly available website and assess its digital services, ensuring that they provide modern functionality and accessibility. We prioritize ongoing modernization efforts based on those with the most direct user impact. The USITC website (www.usitc.gov) is the most important digital service that we offer for public engagement. It provides tariff information, industry and economic research, and trade data to the public. We have identified four additional Commission digital services as having a significant role in public engagement: the Electronic Document Information System, DataWeb, Investigations Database System, and the HTS web applications. All four services are publicly accessible and meet the technical, functional, and security requirements of new websites and digital services.

The Commission uses digital signatures to the extent practical unless handwritten signatures are required by law. We provide policies and rules on using electronic signatures, including digital signatures, for agency personnel. New electronic applications and major revisions must support electronic signatures.

Additionally, all published factfinding investigations and publications were compliant with Section 508 of the Rehabilitation Act of 1973 (Section 508) and other federal accessibility authority and guidance. The Commission's accessibility efforts include training and the application of Section 508 accessibility measures through our reporting and at hearings.

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The Office of Inspector General

The U.S. International Trade Commission's Office of Inspector General (OIG) is an independent office that conducts audit, evaluation, inspection, and investigative activities covering all Commission programs and strategic operations. Its mission is to detect fraud, waste, and abuse and to promote integrity, efficiency, and economy in the Commission's programs and operations. By statute, the OIG is required to perform four reviews in FY 2026. The OIG uses contractor support to perform the independent audit of the Commission's annual financial statements and review the Commission's compliance with the Federal Information Security Modernization Act (FISMA). In-house staff will provide oversight of the contractors and perform the remaining two mandatory reviews on improper payments and the agency's charge cards. In addition to these reviews, the OIG has identified five potential areas for discretionary review in the [FY 2026 Annual Audit Plan](#). The plan also contains a list of reserve audits and reviews that the OIG would like to perform if resources become available.

The Inspector General Act of 1978, as amended, 5 U.S.C. § 406(g), requires certain specifications concerning Office of Inspector General budget submissions each fiscal year. In particular, the Inspector General Act states that:

Each Inspector General (IG) is required to transmit a budget request to the head of the establishment or designated Federal entity to which the IG reports specifying:

- the aggregate amount of funds requested for the operations of the OIG
- the portion of this amount requested for OIG training, including a certification from the IG that the amount requested satisfies all OIG training requirements for that fiscal year
- the portion of this amount necessary to support the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

The head of each establishment or designated Federal entity, in transmitting a proposed budget to the President for approval, shall include:

- an aggregate request for the OIG
- the portion of this aggregate request for OIG training
- the portion of this aggregate request for support of the CIGIE
- any comments of the affected IG with respect to the proposal.

The President shall include in each budget of the U.S. Government submitted to Congress:

- a separate statement of the budget estimate submitted by each IG
- the amount requested by the President for each OIG
- the amount requested by the President for training of OIGs
- the amount requested by the President for support of the CIGIE
- any comments of the affected IG with respect to the proposal if the IG concludes that the budget submitted by the President would substantially inhibit the IG from performing the duties of the OIG.

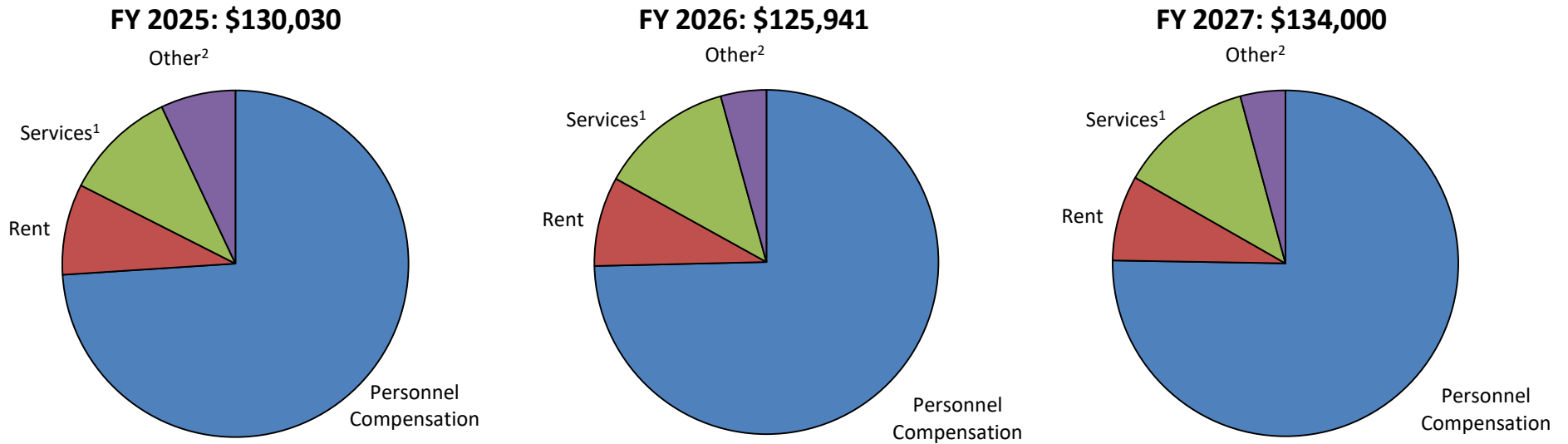
Following the requirements as specified above, the OIG of the U.S. International Trade Commission submits the following information relating to the OIG's requested budget for fiscal year 2027:





- \$2,096,176 in aggregate for the operations of the OIG
- \$32,000 of that amount for OIG training
- \$8,767 (0.42 percent of the budget request) for OIG's contribution to the Council of the Inspectors General on Integrity and Efficiency.

I, Rekha "Rashmi" Bartlett, certify as the IG of the U.S. International Trade Commission that the amount I have requested for training satisfies all OIG training requirements for fiscal year 2027.

Obligations: Comparison by Budget Object Classification, Fiscal Years 2025–27

(Dollar amounts in thousands)



CATEGORY OF OBLIGATION		FY 2025 Actual		FY 2026 Estimate		FY 2027 Request	
		Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Personnel Compensation		\$96,209	74.0%	\$93,993	74.6%	\$100,844	75.3%
Rent		11,009	8.5%	10,601	8.4%	10,703	8.0%
Services		13,739	10.5%	15,965	12.7%	16,829	12.5%
Other		9,073	7.0%	5,382	4.3%	5,624	4.2%
TOTAL		\$130,030	100.0%	\$125,941	100.0%	\$134,000	100.0%

Note: Dollars may not add due to rounding in this and subsequent charts.

¹Services include, but are not limited to, obligations for contractor staff (IT service desk, security guards, financial audits), software licenses, and equipment maintenance.

²“Other” includes budget object classes such as equipment, supplies, communications and equipment rental, travel, training, printing and reproduction, land and structures, postage and contractual mail, and transportation.

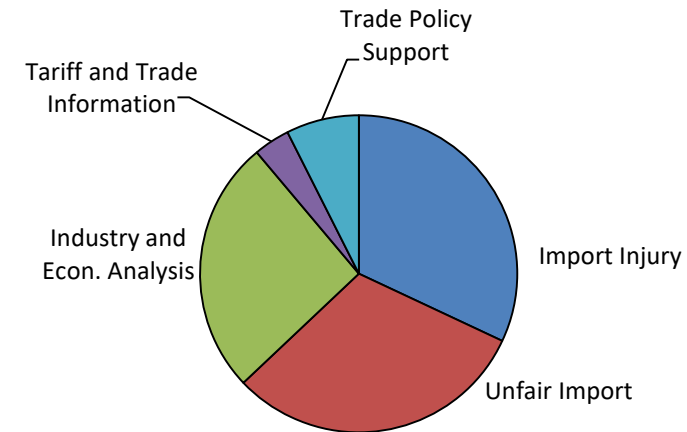
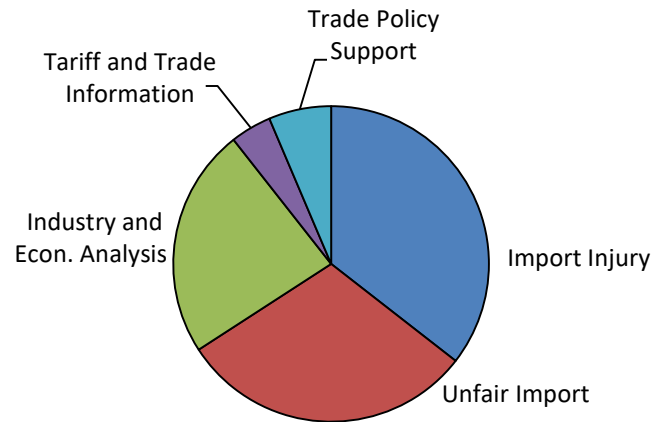
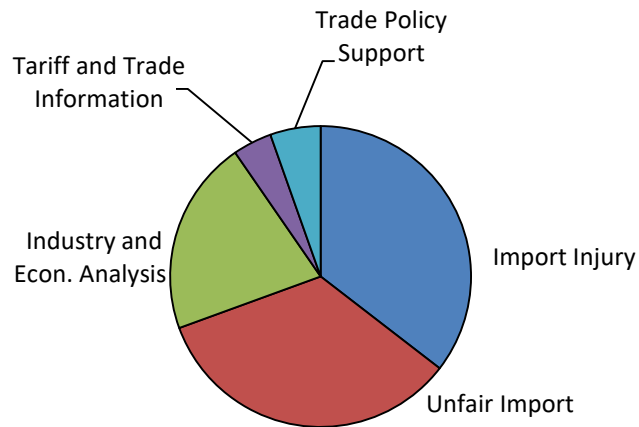
Obligations: Comparison by Strategic Goal, Fiscal Years 2025–27

(Dollar amounts in thousands)

FY 2025: \$130,030

FY 2026: \$125,941

FY 2027: \$134,000



CATEGORY OF OBLIGATION	FY 2025 Actual		FY 2026 Estimate		FY 2027 Request	
	Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Trade Remedy Investigations (Strategic Goal 1)						
Import Injury	\$46,101	35.5%	\$44,751	35.6%	\$42,823	32.0%
Unfair Import	44,206	34.0%	38,199	30.3%	41,546	31.0%
Analysis and Information on Trade and Competitiveness (Strategic Goal 2)						
Industry and Economic Analysis	27,238	20.9%	29,637	23.5%	34,729	25.9%
Tariff and Trade Information	5,440	4.2%	5,306	4.2%	4,981	3.7%
Trade Policy Support	7,045	5.4%	8,048	6.4%	9,921	7.4%
TOTAL	\$130,030	100.0%	\$125,941	100.0%	\$134,000	100.0%

Analysis of Change by Budget Object Classification, Fiscal Years 2025–27

(Dollar amounts in thousands)

	FY 2025 Actual	FY 2026 Estimate	FY 2027 Request	FY 2026–27 Change	Percentage Change
Personnel Obligations	\$96,209	\$93,993	\$100,844	\$6,851	7.3%
FTEs	433	412	441	29	7.0%
Non-personnel Obligations					
Rent	\$11,009	\$10,601	\$10,703	\$102	1.0%
Services	13,739	15,965	16,829	864	5.4%
Supplies	1,886	1,918	1,997	79	4.1%
Equipment	4,483	597	446	-151	-25.4%
Travel	148	250	361	111	44.5%
Training	316	375	501	126	33.6%
Communications and Equipment Rental	1,895	1,925	1,982	57	3.0%
Printing and Reproduction	321	286	298	12	4.1%
Official Reception and Representation	3	2	2	0	0.0%
All Other (Transportation, Postage, Land and Structures, Credit Card Rebates)	22	29	37	8	27.8%
Subtotal Non-personnel Obligations	\$33,821	\$31,948	\$33,156	\$1,208	3.8%
Total Obligations	\$130,030	\$125,941	\$134,000	\$8,059	6.4 %

Summary of Changes from the FY 2026 Estimate

(Dollar amounts in thousands)

Personnel Obligations

Personnel **+\$6,851**

Personnel obligations are expected to increase by about \$6.9 million. This funding is required to increase staffing levels after making significant human capital investments in FY 2024 and the first part of FY 2025 that cannot be sustained with a \$122 million FY 2026 appropriation. Our FY 2026 budget request of \$134 million reflected the funding level necessary to meet our statutory mandates and address existing and projected workload. However, operating for a fourth consecutive year with a \$122 million appropriation in FY 2026 threatens that ability. Our FY 2025 staffing level (full-time equivalents, or FTEs) was 433 but that number is projected to decrease to 412 in FY 2026. Our FY 2027 staffing goal is to attain a staffing level of 441 FTEs, the number of staff needed to achieve our mission during a time of record workload, with manageable risk levels across all mission areas. As of late January 2026, we had 398 staff onboard, with vacancy rates as high as 20 percent in offices responsible for statutory workload. While we have recently resumed hiring and are striving to meet 412 FTEs for the fiscal year, this staffing level is still insufficient for our current workload.

In FY 2024, the Commission experienced a surge in the number of AD/CVD petition filings, reaching its second-highest level in the last two decades, followed by another surge in FY 2025, reaching record-level filings. We are also experiencing an upward trend in AD/CVD five-year reviews. In FY 2025, we instituted 27 preliminary-phase investigations covering a wide variety of industries in the U.S. economy; more than one-half of the petitions involved imports from multiple countries. We anticipate instituting 17 preliminary-phase investigations in each of FYs 2026 and 2027. In addition to new investigations, we instituted 34 reviews of existing AD/CVD orders in FY 2025 and anticipate instituting 45 in FY 2026 and 34 in FY 2027. Though cyclical, the Commission’s caseload is projected to remain at historically high levels. Whereas the 10-year average for institutions and completions was 40 during FYs 2002-11 and 53 during FYs 2012-21, the five-year average for FYs 2022-26 is 73 (an 82 percent increase over the first 10-year period and a 38 percent increase over the second).

For over two decades, there has been an overall upward trend in the rolling 10-year average of new section 337 complaints filed year over year. In FY 2025, the number of active investigations increased. Based on current activity level, we expect an

increase in new filings in FYs 2026 and 2027. Additionally, in FYs 2026 and 2027 we expect the workload for technical assistance and factfinding investigations to increase over FY 2025, given the ongoing activity as of the first quarter of FY 2026 and the active trade policy agenda of the executive and legislative branches. Lastly, in addition to undertaking a needed upgrade to the HTS application, the number of tariff-related actions increased in number and complexity in FY 2025, increasing resources needed to maintain and update the HTS to reflect those actions. We expect this technical expertise to support tariff actions will continue to be in high demand in FYs 2026 and 2027.

This funding level will also cover the anticipated pay raise effective January 1, 2027, and pay for the normal cost of employee promotions, within-grade increases, and increased benefits.

Non-personnel Obligations

Rent **+\$102**

Rent obligations are expected to increase by \$102,000 due to annual operating cost increases contained in the building occupancy agreement.

Services **+\$864**

Services obligations are expected to increase by \$864,000 to accommodate inflationary increases in our service contracts and the anticipated cost to re-compete our software engineering contract, which supports maintenance and improvements to our web-based applications like the newly re-engineered HTS system.

Supplies **+\$79**

Supplies obligations are expected to increase by \$79,000, reflecting inflationary increases in the cost of data purchases that support our statutory investigations.

Equipment **-\$151**

Equipment obligations are expected to decrease by \$151,000 due to decreases in IT lifecycle equipment replacement.

Travel	+\$111
<p>Travel obligations are projected to increase by \$111,000 to sufficiently fund statutory investigations, anticipated studies, knowledge development in emerging trade issues and priority areas, representational travel to international organization meetings, litigation support, and multilateral and regional agreement negotiation support.</p>	
Training	+\$126
<p>Training obligations are expected to increase by \$126,000 to provide sufficient funding for developing and advancing staff skills and meeting the licensing, certification, and professional education requirements of existing and newly hired staff.</p>	
Communications and Equipment Rental	+\$57
<p>Communications and equipment rental obligations are expected to increase by \$57,000 because of inflationary cost increases built into our telecommunications contract.</p>	
Printing and Reproduction	+\$12
<p>Printing and reproduction obligations are expected to increase by \$12,000 because of Government Publishing Office requirements.</p>	
All Other (Transportation, Postage, Land and Structures, Credit Card Rebates)	+\$8
<p>Miscellaneous obligations are expected to increase slightly.</p>	
Net Non-personnel Obligations Changes	+\$1,208
Total Adjustment to FY 2026 Estimate (\$125,941)	+\$8,059
Total FY 2027 Budget Request	\$134,000

The Commissioners

The USITC is headed by six commissioners, who are nominated by the President and confirmed by the U.S. Senate. Amy A. Karpel, a Democrat, is serving as Chair of the Commission, for a term ending June 16, 2026. A Vice Chair has not been nominated for the current term. Other commissioners currently serving are, in order of seniority, David S. Johanson, a Republican, and Jason E. Kearns, a Democrat.⁴

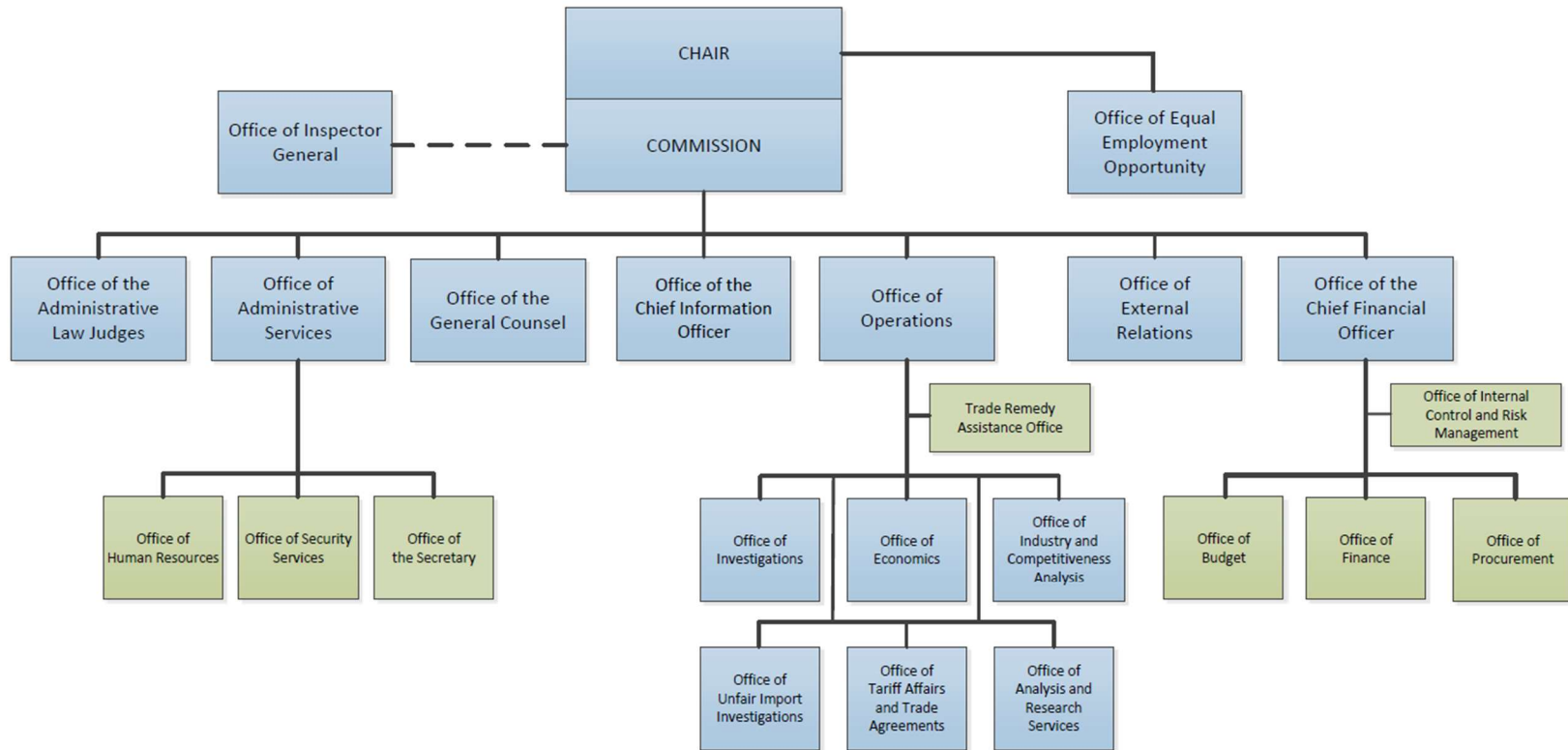
Each commissioner serves a term of nine years, unless appointed to fill an unexpired term. The terms are set by statute and are staggered such that a different term expires every 18 months.⁵ A commissioner who has served for more than five years is ineligible for reappointment. A commissioner may, however, continue to serve after the expiration of his or her term until a successor is appointed and qualified. Congress's desire to create an independent and nonpartisan Commission is evident in the rules that dictate the composition of the Commission. No more than three commissioners may be members of the same political party. The Chair and the Vice Chair are designated by the President and serve for a statutory two-year term.⁶ The Chair may not be of the same political party as the preceding Chair, nor may the President designate two commissioners of the same political party to serve as the Chair and Vice Chair. Currently two Democrats and one Republican serve as commissioners.

⁴ Currently, there are three vacancies.

⁵ 19 U.S.C. § 1330.

⁶ If the President does not designate a Chair, the senior commissioner of the relevant political party serves as Chair, by operation of law.

U.S. International Trade Commission Office-level Organization Chart



Current Permanent and Term Hiring Plan and Onboard Staffing Levels

Office	Permanent and Term Positions		
	FY 2027 Hiring Plan	Onboard as of 1/28/26	Gap
Commissioners	32	19	13
External Relations	4	4	0
Inspector General	7	3	4
General Counsel	62	56	6
Administrative Law Judges	29	24	5
Equal Employment Opportunity	3	3	0
Chief Information Officer	38	34	4
Subtotal: Other Offices	175	143	32
Operations	10	10	0
Analysis and Research Services	25	23	2
Investigations	39	32	7
Unfair Import Investigations	28	23	5
Economics	42	35	7
Tariff Affairs and Trade Agreements	15	12	3
Industry and Competitiveness Analysis	73	61	12
Subtotal: Operations	232	196	36
Chief Financial Officer	4	4	0
Budget	3	3	0
Finance	6	4	2
Procurement	5	5	0
Internal Control & Risk Management	2	1	1
Subtotal: Chief Financial Officer	20	17	3
Administrative Services	9	7	2
Human Resources	12	14	-2
Secretary and Dockets	22	15	7
Security Services	7	6	1
Subtotal: Administrative Services	50	41	9
Commission Total Positions Prioritized for Hiring/Onboard Staff	477	398	79
Commission Total FTEs by FY*	441	412	29

* The number of FTEs supported by our FY 2027 budget request of \$134 million and our FY 2026 appropriation of \$122 million respectively.

We are constantly evaluating our workload and aligning resources to meet emergent needs. In the short term, we may approve requests for an office to exceed its staffing allocation to meet workload challenges. If those workload challenges persist, we may make the adjustment permanent by shifting positions.

The End



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