



United States
International Trade Commission

Budget Justification

Executive Summary

Fiscal Year 2016



Years of Promoting and Protecting the U.S. Economy

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BUDGET HIGHLIGHTS

Our FY 2016 request of \$131.5 million provides \$88.8 million in core program funding, as well as \$42.7 million to fully fund the costs of our transition to a new lease for office space. This \$42.7 million is a one-time cost related to the expiration of our lease and our new housing plan that will enable us to operate efficiently in reduced space. Over the ten decades of our existence, international trade expansion has greatly benefited the U.S. economy, and our agency has played a key role in ensuring that expanded trade is conducted fairly. The amount we are requesting for our core program funding and transition lease costs will support our efforts to carry out our mission effectively. It will allow us to reduce our housing space and make concomitant investments in technology that will support needed improvements in our productivity and transparency. In particular, we rely heavily upon a Public Courtroom Complex—which is a critical component of our housing plan—to efficiently conduct trials, and to accommodate the participation of interested parties in our trade remedy and fact-finding proceedings.

Proposed FY 2016 personnel costs account for about \$1.1 million of the increase over FY 2015 and reflect the increased resources needed to maintain critical FY 2015 staffing improvements, the cost of the anticipated 1.3 percent pay raise effective January 1, 2016, normal costs for promotions and within-grade increases, and higher benefits costs. Our human capital strategy for FY 2016 focuses on maintaining staffing at the levels needed to perform our statutory mission. The challenges of high caseloads, six major ongoing trade negotiations to support, and congressional consideration of Trade Promotion Authority require sufficient funds to maintain adequate staffing levels.

Proposed non-personnel expenses account for about \$45.6 million of the increase over FY 2015. The large majority of these anticipated costs, \$42.7 million, are associated with renewal of the agency's lease, which we discuss below in more detail. The remainder of the increase, \$2.9 million, will fund core program activities. This amount will pay for needed investments in information technology (IT) infrastructure, equipment, and cybersecurity that will help ensure a secure and efficient network, as well as for the expansion of the research and economic analysis capabilities needed to support requested studies on trade negotiations and trade policy.

Lease Renewal

Our lease expires on August 10, 2017. In the spring of 2013, we began the planning process for lease renewal. Working with the General Services Administration (GSA), we developed a description of our minimum requirements for a new lease. Two objectives drove this process. First, we sought to follow Congress's direction that our agency's public courtroom complex meet our section 337 caseload requirements and our requirements for hearings in antidumping and countervailing duty and international trade and industry competitiveness investigations. Second, we sought to follow

the direction of Congress, GSA, and the Office of Management and Budget that we reduce the cost of federal facilities for agency operations by optimizing space allocation. We believe our housing plan meets both objectives.

At GSA's recommendation, we retained a space-planning consultant to help us develop our space requirements, housing plan, and cost estimates. Our project goal was to achieve the most efficient office and special space options for accomplishing our statutory mission, while reducing our space footprint. Our space reduction effort started with a consolidation of some office suites and a release of 4,172 square feet of office space in July 2014. The proposed Housing Plan submitted to GSA in September 2014 further reduces our overall space by an additional 41,992 square feet. The total reduction is over 26 percent, including both the initial release of space and the reductions in the proposed Housing Plan. Office space is reduced by 22 percent and other space is reduced by 52 percent (exclusive of our critically important Public Courtroom Complex).

Our need to maintain the Public Courtroom Complex at approximately its current size remains a critical component of accomplishing our mission. The Public Courtroom Complex includes three courtrooms and a Main Hearing Room. It is not used to house staff but instead is a facility that serves the public. The courtroom and hearing spaces are used to hear claims of unfair trade from domestic industries and to adjudicate patent infringement and other claims brought by intellectual property (IP) owners. The availability of the courtrooms and the hearing room is therefore critical to our ability to foster prompt adjudication consistent with congressional timeframes. In fact, in FY 2010, Congress specifically appropriated funds so that we could acquire additional space and build a new courtroom to address our heavy and complex unfair trade and IP caseload. As a result of this appropriation, we constructed a third courtroom and put it into service in 2013.

We prepared our \$42.7 million budget request for new lease-related expenses based on cost estimates developed by the USITC's consultants, RTKL and JLL, which we engaged at GSA's recommendation. RTKL and JLL are real estate advisory firms that regularly prepare cost estimates for GSA projects. The estimated costs for our new lease reflect design and furnishings that will allow us to operate in reduced space. They also reflect the current costs of construction in the greater metropolitan Washington, D.C., area and the assumption that the project will be procured in a competitive bid environment with a minimum of four qualified bidders. GSA reviewed the cost estimate, identified additional costs and offsetting tenant allowances, and recommended that we ask Congress to appropriate all funding in FY 2016 rather than deferring any part of the appropriation request. We believe our budget request represents the lowest-cost option for implementing our Housing Plan.

The end result of this process, as noted above, is a Housing Plan that would enable us to carry out our mission in reduced but more efficiently designed space. In order to achieve these goals, we require an appropriation sufficient to fund our Housing Plan. The total \$42.7 million cost includes design, construction, personal property acquisition, relocation of property we can use in the new space (furniture, IT equipment and infrastructure), and is inclusive of fees and allowances.

Program Overview

Intellectual Property (Section 337) and Antidumping/Countervailing Duty Investigations

The Commission's trade remedy investigations caseload remains high and continues to grow in complexity. Our agency provides a venue for private sector firms to bring allegations of unfair trade practices involving imports before an independent, objective, and expert quasi-judicial government body.

Intellectual property caseload

Our section 337 process provides a highly-desired arena for the resolution of disputes involving imports that allegedly infringe U.S. IP rights. Our process provides a relatively quick resolution of matters that would usually involve more protracted litigation in the U.S. district courts. In addition, the section 337 process provides unique relief in the form of exclusion of goods at the border. IP-intensive industries account for a large number of high wage jobs in industries in the United States that generate a trade surplus. Our section 337 workload, while not at the peak level seen in FY 2011, is expected to remain at elevated levels. Although section 337 investigations typically involve patent infringement allegations by private firms, the number of investigations based on trade secrets, an area of heightened concern for U.S. companies, the Administration, and Congress, is increasing. The range of technologies covered in these investigations is quite broad, covering such products as smartphones and other wireless devices, smart televisions, semiconductors, GPS devices, windshield wiper blades, and tires.

We continue to work to ensure that section 337 investigations are completed in a timely manner, which is in line with congressional intent. After several years of focusing on ensuring we had the necessary resources to handle the section 337 workload, we now have undertaken specific efforts to make the section 337 process more efficient and less costly for both the agency and litigants. Our efforts include rules changes, procedural pilot programs, and substantial investments over the past few years in our Electronic Document Information System (EDIS). Further, in FY 2016 we plan to implement electronic service of confidential documents in EDIS. We have also developed a new publicly-available information system, 337Info, which will make available more detailed information regarding investigations instituted since October 1, 2008. 337Info provides scheduling and staffing information regarding investigations as well as information regarding unfair acts alleged, disposition with respect to each party, and information related to appeals. EDIS and 337Info have enhanced both our management of the large volume of investigation-related materials and the transparency of our investigative process. These systems are also Open Data compliant, which furthers our efforts to improve the accessibility and utility of our data. Continued funding of these types of improvements will help us address the challenges of resolving section 337 matters in a timeframe that will benefit the parties with whom we work.

Antidumping and countervailing duty investigations caseload remains high

New petition filings under Title VII of the Tariff Act of 1930 in FY 2014 were consistent with historical averages. While a number of petitions filed in FY 2013 involved multiple countries, the majority of petitions during FY 2014 involved imports from a single country, with China being the predominant source of subject imports. Industries filing petitions in FY 2014 represented a wide variety of products, including chemicals, agriculture, steel, and energy-related products. Over the next two years, we plan to work to improve our data collection and verification processes and make them more efficient and effective. During FY 2014, we continued to develop and implement processes that will reduce the burden on participating parties and our staff, including the use of improved electronic processing of investigation-related data, automated databases, streamlined questionnaires, and other data collection methods. During FY 2015, we will be developing a database for Title VII investigations to assist with the efficient, timely, and accessible reporting of investigation information. Continuing these efforts will require investments in new technologies and in employees with the necessary skills to develop and manage the improved databases.

Tariff, Trade, and Competitiveness-Related Analysis and Information

We provide industry and economic analysis, tariff and trade information services, and trade policy support to the executive branch and Congress. We provide the objective and independent information and analysis that is necessary to support U.S. trade negotiations, analyze the effects of trade agreements, and identify trends in competition. This work is performed through formal investigations and/or informal expert advice. We also maintain and update the U.S. Harmonized Tariff Schedule (HTS). Customs and Border Protection relies upon the HTS to collect tariff revenues on imported goods; private sector firms use it to reference the current and future tariff amounts they will pay on imported goods. U.S. exporters and importers rely on our work in the World Customs Organization to ensure that global tariff nomenclature is up-to-date and takes into account U.S. industry interests and changing patterns of trade.

The complexity of our industry and economic analysis continues to increase

International trade touches nearly all sectors of the U.S. economy. As with our section 337 and Title VII investigations, we must constantly develop and refine our capabilities so that we can respond to requests for increasingly complex analysis in emerging areas of international trade, the economy, and policy development. As a result, we have a continued need to improve and enhance the collection of a vast array of information required for this analysis, including primary data we must gather when no data are available from other sources. For example, we recently conducted investigations that examined the role of digital trade (commerce in products such as software, digital media, and services over digital networks) in the U.S. economy and the effects of Indian trade, investment, and industrial policies on the U.S. economy. Both of these investigations required the collection and statistical analysis of new, unique data. In other instances, our staff applies new tools or methodologies to ensure that we provide a state-of-the-art

economic analysis of the matters involved in the investigation. This effort may involve working with other organizations or academic institutions to leverage specialized knowledge or expertise. Our ongoing investigation of the global rice market is an example of drawing on the support of academic experts to apply a specialized database and economic model to provide the best possible analysis.

We also provide targeted information to assist policy makers with specific issues. Our staff is increasingly involved in providing technical support to negotiators working on the Information Technology Agreement, the Trans-Pacific Partnership, the Transatlantic Trade and Investment Partnership, the Environmental Goods Agreement, and the Trade in Services Agreement. The ongoing development of trade-related databases and quantitative analytic techniques plays a vital role in helping us respond quickly and comprehensively to customer needs.

Our work in industry and economic analysis spans a wide variety of issues, including such issues as agricultural policies; global and regional value chains; the effects of trade and investment barriers, rules of origin, and standards on U.S. businesses, consumers, and trade flows; and the impact of government policies on small and medium-size businesses. Our reports also analyze emerging or non-traditional industries, examine the integration of goods and services in production and trade, and evaluate the offers made by foreign countries during trade negotiations. To effectively support the interests of trade policy makers, we must maintain a staff with expert knowledge and skills which will be able to provide unique, relevant, and timely insights on new and fast-evolving sectors of the U.S. economy in the global market place.

Tariff and trade information services will benefit from new technology and improved business processes

The HTS provides the foundation for the U.S. trade data maintained by the U.S. Census Bureau and enables Customs and Border Protection to manage its trade and enforcement activities. We therefore ensure that the HTS is both accurate and up-to-date so that it meets the demands for trade and tariff information from Customs and Border Protection, U.S. exporters and importers, and policy makers in the Administration and 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. The HTS has over 10,700 tariff lines and must be updated and maintained throughout the year to reflect changes resulting from trade agreement implementation and other congressional and Administration actions. We are in the midst of completely reworking the information technology system underlying the HTS and its business processes for updating, searching, and providing information to all users. This system was redesigned in FY 2013, was developed as an electronic database system in FY 2014, and will become available as a resource to the public by the end of FY 2015.

As the above makes clear, we must address changing technology requirements for the tariff and trade information area as well as current and anticipated resource gaps. Our appropriation request provides funding to address these issues. The skills required to support various components of tariff and trade information services (e.g., HTS maintenance, HTS classification, rules of origin assessments, and miscellaneous tariff bill assessments) are unique and can take years to develop. Moreover, many of our agency experts who contribute to tariff and trade information services

are now, or soon will be, eligible for retirement. We therefore anticipate that human capital planning and recruitment will be a priority over the next few years.

Trade policy support may face resource constraints with ambitious U.S. negotiating agenda

We draw heavily on staff in all agency program areas to respond to requests on trade policy from Congress and the Administration that require quick turnaround times. In the past year, we provided rapid responses on a broad array of issues and topics, ranging from technical reviews of proposed laws to IP rights and technical barriers to trade. We also provided information, expertise, and software-based tools to support U.S. negotiating teams. We are seeing increasing interest from our customers on nontariff-related trade matters, as well as the numerous emerging tradable sectors such as digital trade. Moreover, behind-the-border issues related to regulation and services trade require us to re-focus our resources and apply new analytical techniques. Additionally, our staff members are often detailed to our main customers to support our customers' work while developing their own skills and experience. Our customers place a high value on our staff's ability to produce objective and independent information and analysis on their most pressing issues. To the extent that we face heavier workloads, more complexity, and staffing challenges in various areas, our ability to respond to these requests will be limited.

Efforts to Strengthen Information Technology Security

In FY 2014, we initiated the transition from our current Internet connection to the Trusted Internet Connection program, which is a federal government-wide requirement overseen by the Department of Homeland Security. This new program will improve our security and incident response capabilities on external network connections. We expect it to be operational before FY 2016. During FY 2014, we also continued our transformation of the HTS database, which allows tariff information to be more easily updated, accessed, and verified. We expect to deploy the new HTS database in FY 2015 after our staff receives security authorization to operate the system. In addition to more open data, the new HTS system will incorporate logical validation that will improve information security and ensure the availability and integrity of tariff information.

In FY 2015, we will continue to focus on strengthening our IT security and broadening the use of technology to improve our business and financial procedures. Additionally, we expect to meet significant milestones associated with deployment of technology needed to enforce strong authentication through government-issued personal identity verification cards (HSPD-12).

In FY 2016, we will continue to enhance our security posture by investing in new technologies, processes, and capabilities in line with the requirements for Information Security Continuous Monitoring and other security requirements.

Senate Report 113-181: Cybersecurity Resources

Senate Report 113-181 instructs agencies to include in their budget justifications a “detailed description of cybersecurity resources requested by the department or agency categorized according to resources that (1) prevent malicious cyber activity, including the protection of Federal systems; (2) detect, analyze, and mitigate intrusions, including investigating and prosecuting cyber criminals; and (3) shape the cybersecurity landscape, including research and development.” Our FY 2016 budget request contains nearly \$1.1 million for cybersecurity resources. Approximately \$884 thousand is requested to prevent malicious cyber activity through investments in security control assessments, Information Security Continuous Monitoring, Continuous Diagnostics and Mitigation, information security training, and licenses for security tools. Further, \$173 thousand is requested to detect, analyze, and mitigate intrusions through investments in hardware and maintenance of network logging and security event detection tools. Our current cybersecurity budget is based on using existing commercial products and tools for prevention, detection, and response to security threats and vulnerabilities. We are not currently investing in research and development of new products that would shape the cybersecurity landscape.

Internal Controls Efforts

We are committed to continuing our efforts to develop and maintain an effective system of internal controls. Internal control management affects all areas of the organization at the agency-wide and office-specific levels, including our administrative, programmatic, information technology, security, compliance, and financial activities. We have designed and developed this system to be a multi-year initiative that will incorporate Enterprise Risk Management (ERM) processes while transforming the management structure and culture of the agency.

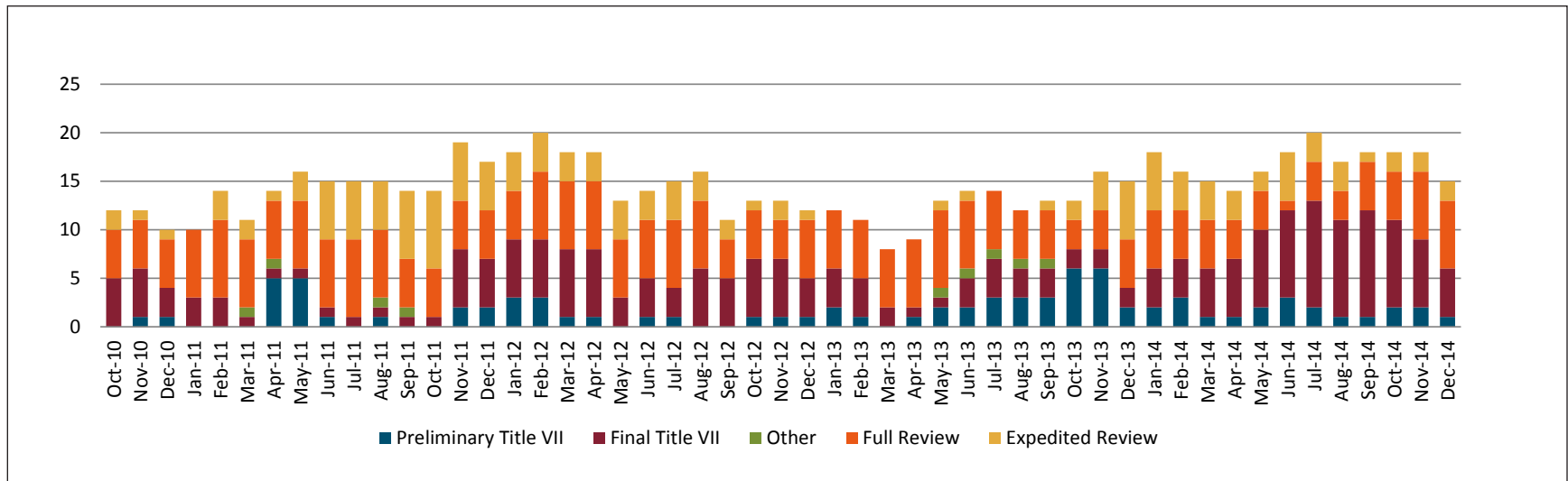
We continue to strengthen internal controls in both the financial and operational areas. We are also integrating internal controls into our existing and new processes, and have started to conduct annual evaluations of office-level and agency-wide controls. We are also building an ERM framework to detect, prioritize, manage, and report institutional risk at all levels.

During the past year, we also changed our organizational structure to better support internal controls and risk management initiatives. We hired a director to head-up the newly established Division of Internal Control and Risk Management, which supports our agency’s Chairman and members of the Senior Executive Service as they enhance their internal control policies and institute more rigorous agency-wide oversight.

We are committed to improving our internal controls in the future, and will build upon the organizational changes and enhanced internal control initiatives just listed to make significant progress in this area in the years to come.

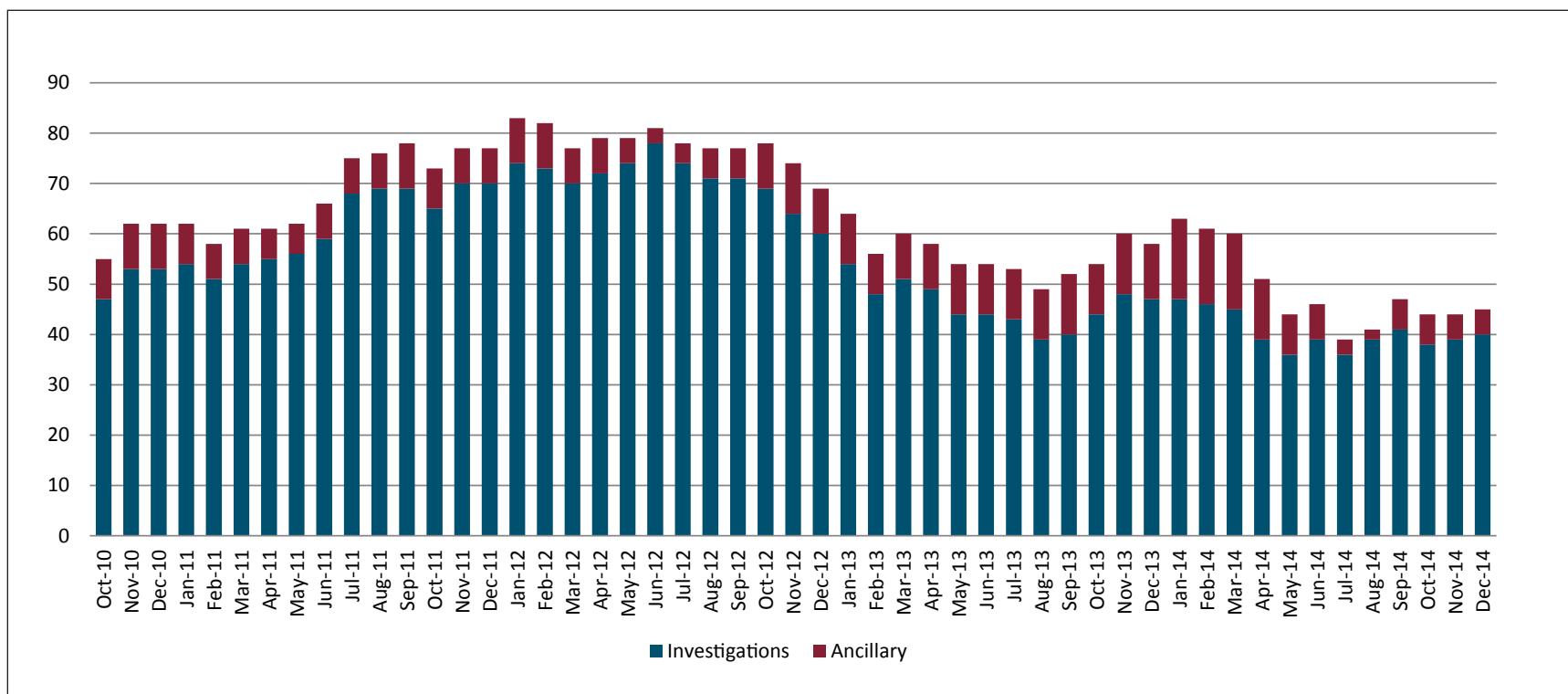
IMPORT INJURY INVESTIGATIONS CASELOAD

Import Injury Investigations	Instituted							Completed						
	FY 2010 Actual	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Estimate	FY 2016 Estimate	FY 2010 Actual	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Estimate	FY 2016 Estimate
Preliminary Title VII	3	8	8	13	9	10	10	8	8	7	9	13	10	10
Final Title VII	12	2	12	5	15	12	8	11	6	8	7	9	14	10
Other	0	2	0	1	0	1	1	0	2	0	1	0	1	1
Full Review	9	12	7	10	7	10	13	10	9	9	10	7	11	8
Expedited Review	8	19	9	9	11	15	12	8	12	17	3	15	13	14
Total	32	43	36	38	42	48	44	37	37	41	30	44	49	43



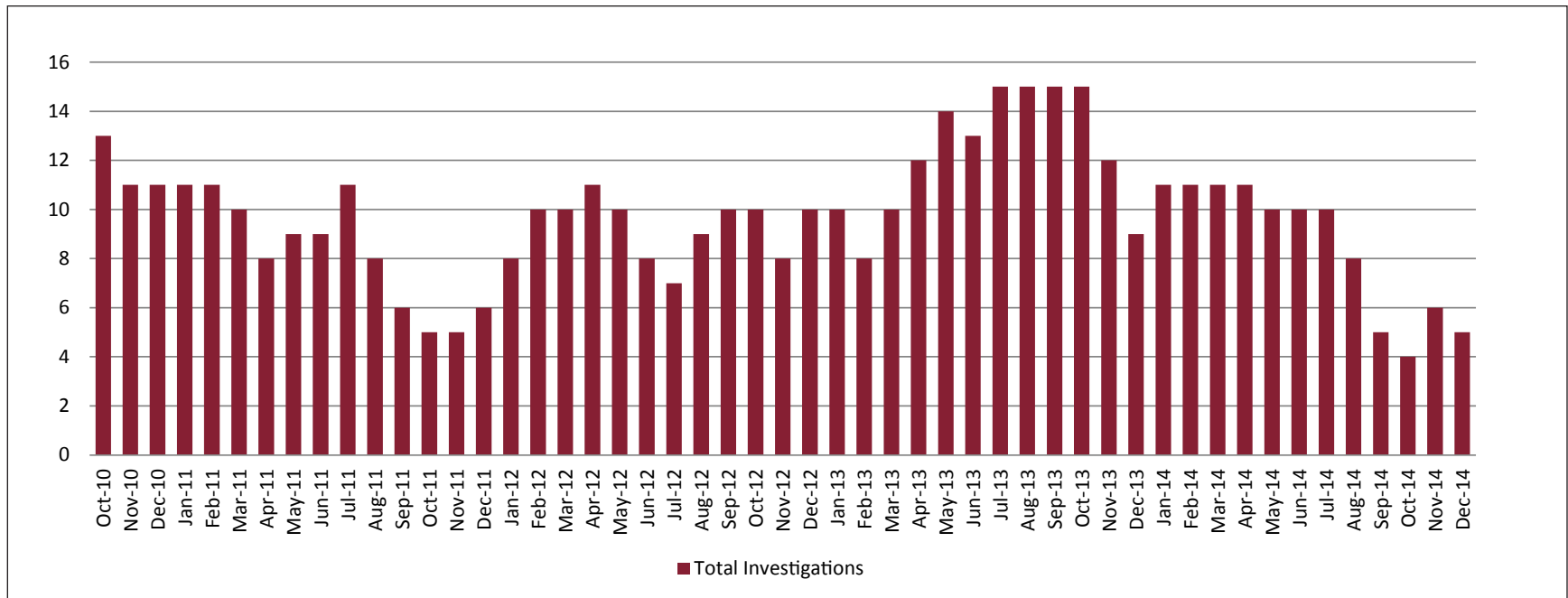
UNFAIR IMPORT INVESTIGATIONS CASELOAD

Status	FY 2010 Actual	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Estimate	FY 2016 Estimate
Instituted	58	78	56	52	49	45	45
Completed	52	58	57	72	59	50	48



INDUSTRY AND ECONOMIC ANALYSIS INVESTIGATIONS CASELOAD

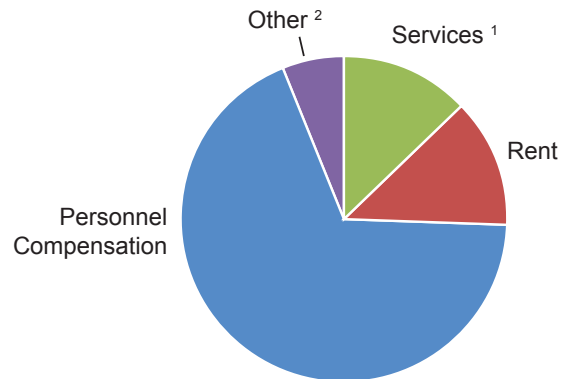
Status	FY 2010 Actual	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Estimate	FY 2016 Estimate
Instituted	16	8	9	10	8	10	10
Completed	13	11	6	12	10	10	10



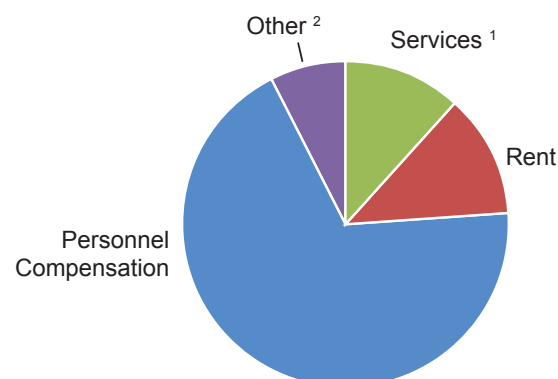
Dollar Cost: Comparison by Object Classification, Fiscal Years 2014-2016

(Dollar Amounts in Thousands)

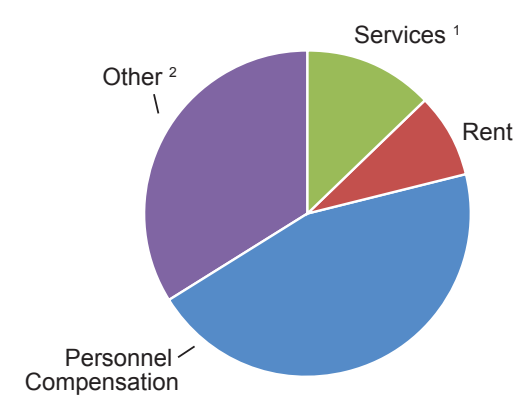
FY 2014: \$83,349







FY 2015: \$84,842



FY 2016: \$131,500



CATEGORY OF OBLIGATION		FY 2014 Actual		FY 2015 Estimate		FY 2016 Request	
		Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
1. Personnel Compensation		\$56,834	68.1%	\$58,070	68.4%	\$59,155	45.0%
2. Rent		10,742	12.9%	10,408	12.3%	11,251	8.6%
3. Services ¹		10,728	12.9%	10,029	11.8%	16,857	12.8%
4. Other ²		5,045	6.1%	6,335	7.5%	44,237	33.6%
TOTAL		\$83,349	100.0%	\$84,842	100.0%	\$131,500	100.0%

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

¹ Services include, but are not limited to, obligations for contractor staff (IT service desk; security guards; financial management, internal controls, and 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.

Analysis of Change by Object Classification

Fiscal Years 2014-2016

(Dollar Amounts in Thousands)

	FY 2014 Actual Obligations	FY 2015 Estimate	FY 2016 Request	FY 2015-2016 Change
Personnel Compensation	\$56,834	\$58,070	\$59,155	\$1,085
Non-personnel Obligations				
Rent	\$10,742	\$10,408	\$11,251	\$843
Services	10,728	10,029	16,857	6,828
Supplies	1,655	1,836	1,905	69
Equipment	1,384	1,863	18,649	16,786
Travel	471	590	575	-15
Training	435	626	601	-25
Communications and Equipment Rental	716	987	1,020	33
Transportation	12	17	17	0
Postage	45	69	69	0
Land and Structures	9	50	21,102	21,052
Printing and Reproduction	317	270	270	0
Official Reception and Representation	1	27	29	2
Subtotal Non-personnel Obligations	\$26,515	\$26,772	\$72,345	\$45,573
Total Obligations	\$83,349	\$84,842	\$131,500	\$46,658

Summary of Increases/Decreases from the FY 2015 Estimate

Personnel Cost Change

(Dollar Amounts in Thousands)

Personnel Costs **+\$1,085**

Personnel costs are expected to increase by approximately \$1.1 million as a result of maintaining critical staffing gains made in FY 2015, the proposed 1.3 percent pay raise effective January 1, 2016, the normal cost of promotions and within-grade increases, and higher benefits costs.

Non–Personnel Cost Changes

Rent..... **+\$843**

Rent costs are expected to increase by \$843 thousand to accommodate escalations in real estate taxes and operating costs included in the leases.

Services..... **+\$6,828**

Services costs are expected to increase by \$6.8 million. The largest component of this increase, \$5.3 million, is for expenses related to the lease transition, such as relocation of the data center, digitization of paper records, and consolidation of the print shop. The remainder of the increase, approximately \$1.5 million, will support several critical investments, including enhancements to the database developed to improve management of import injury investigations, cybersecurity investments to ensure critical systems are compliant with the Federal Information Security Management Act, increased funding for the recent government-wide Information Security Continuous Monitoring (ISCM) cybersecurity requirement, and economic research/consulting services.

Supplies +\$69

Supplies costs are expected to increase by \$69 thousand for data purchases to support research requirements.

Equipment +\$16,786

Equipment costs are expected to increase by approximately \$16.8 million. The largest component of this increase, \$16.4 million, is for expenses related to the lease transition, such as IT equipment and infrastructure, audiovisual equipment and wiring for the Public Courtroom Complex, building security systems, and furniture. The remainder of the increase, approximately \$400 thousand, will support investment in Virtual Desktop Infrastructure (which will be a critical component of seamless IT support through the lease transition) and equipment for the ISCM cybersecurity requirement.

Travel -\$15

Travel is expected to decrease slightly during the lease transition but will be sufficiently funded to accommodate the anticipated workload, the Administration’s ambitious trade agenda, and continued congressional interest in trade issues.

Training -\$25

Training is expected to decrease slightly during the lease transition but will be sufficiently funded to meet staff licensing, certification, and professional education requirements.

Communications +\$33

Communications costs are expected to increase by \$33 thousand primarily for investments in the agency’s disaster recovery site.

Land and Structures +\$21,052

Land and structures costs are expected to increase by approximately \$21.1 million for construction costs related to the lease transition.

Official Reception and Representation +\$2

Official reception and representation funds are expected to increase by \$2 thousand, which has been the level of funding provided in the last several annual appropriations.

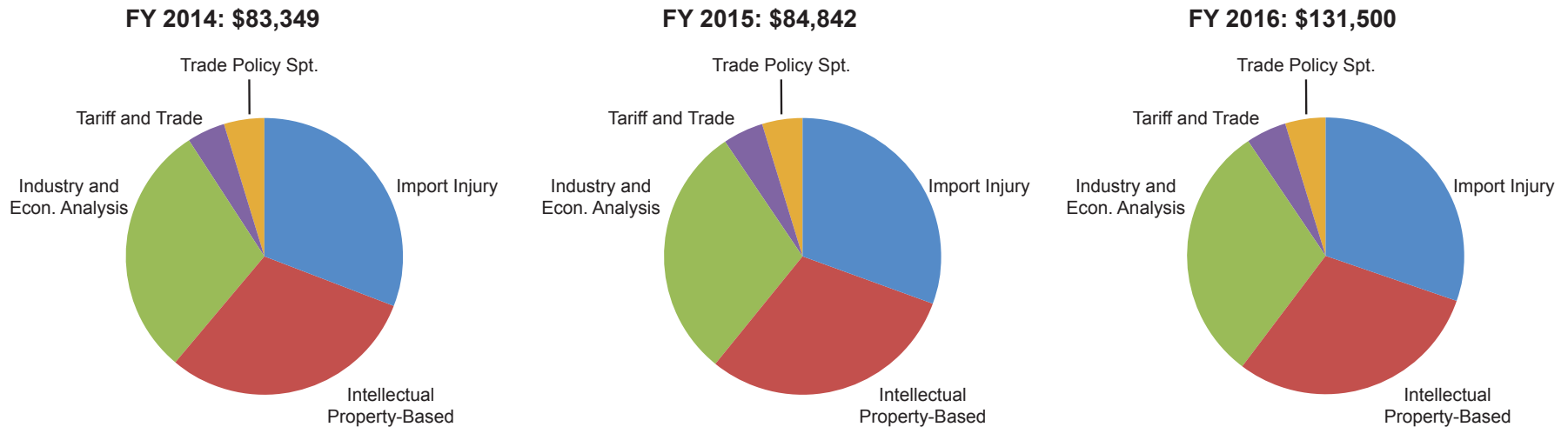
Net Non–Personnel Cost Changes +\$45,573






Total Adjustment to Base (\$84,842) +\$46,658

Total Budget Request \$131,500

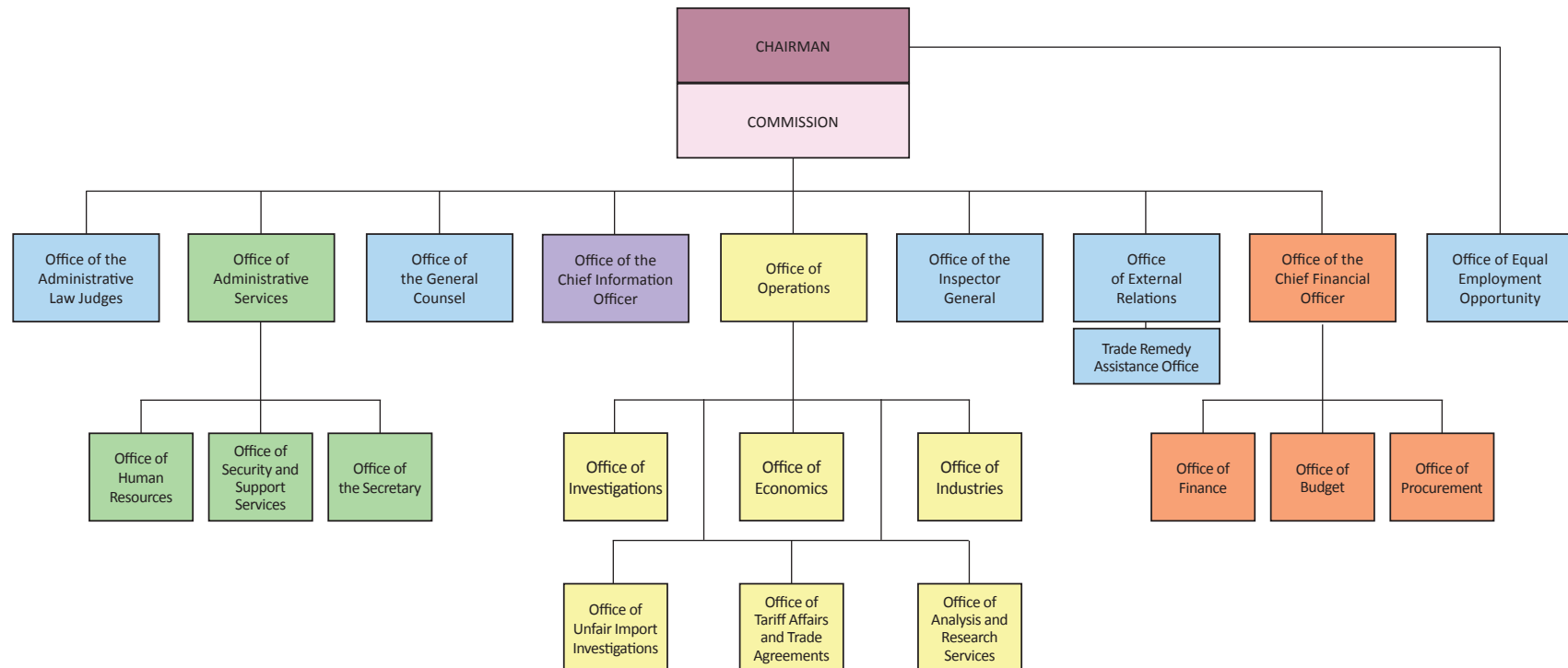
Dollar Cost: Comparison by Strategic Goal, Fiscal Years 2014-2016

(Dollar Amounts in Thousands)



CATEGORY OF OBLIGATION		FY 2014 Actual		FY 2015 Estimate		FY 2016 Request	
		Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Trade Remedy Investigations (Strategic Goal 1)							
Import Injury		\$25,768	30.9%	\$26,089	30.7%	\$40,165	30.5%
Intellectual Property-Based		25,398	30.5%	25,535	30.1%	39,243	29.8%
Tariff, Trade, and Competitiveness-Related Analysis and Information (Strategic Goal 2)							
Industry and Economic Analysis		24,764	29.7%	25,424	30.0%	40,005	30.6%
Tariff and Trade Information Services		3,633	4.4%	3,839	4.5%	5,981	4.5%
Trade Policy Support		3,786	4.5%	3,955	4.7%	6,106	4.6%
TOTAL		\$83,349	100.0%	\$84,842	100.0%	\$131,500	100.0%

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

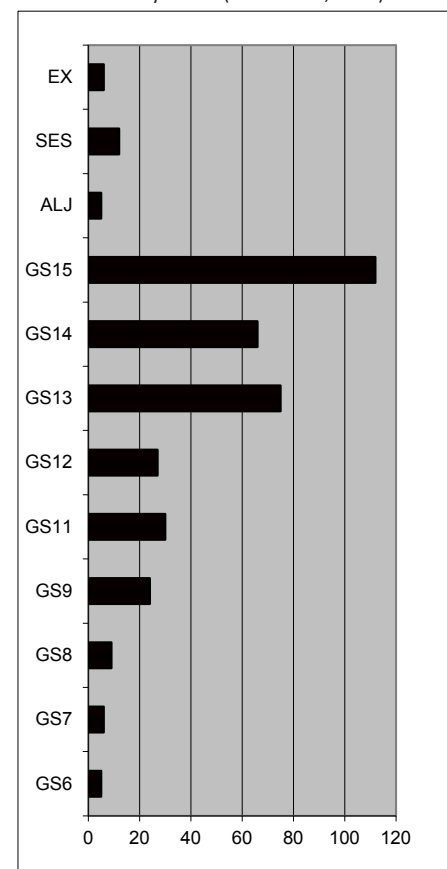


Revised October 2014

Current Permanent and Term Staffing Plan with Onboard and Gaps

Office	FY 2015		
	Permanent and Term Positions in Staffing Plan	Permanent and Term On Board (as of Jan. 9, 2015)	Gap
Commissioners' Offices	32	32	0
External Relations	5	5	0
Inspector General	4	4	0
General Counsel	44	42	2
Administrative Law Judges	24	20	4
Equal Employment Opportunity	2	2	0
Chief Information Officer	31	33	-2 *
Subtotal Independent Offices	142	138	4
Operations	7	5	2
Analysis and Research Services	20	18	2
Import Injury Investigations	27	24	3
Unfair Import Investigations	21	21	0
Economics	42	37	5
Tariff Affairs and Trade Agreements	14	14	0
Industries	84	62	22
Subtotal Operations	215	181	34
Chief Financial Officer	4	4	0
Budget	2	2	0
Finance	9	8	1
Procurement	6	6	0
Subtotal Chief Financial Officer	21	20	1
Administrative Services	5	5	0
Human Resources	8	9	-1 *
Security and Support Services	12	8	4
Secretary and Dockets	16	16	0
Subtotal Administrative Services	41	38	3
Commission Total	419	377	42

Onboard Staff by Grade (as of Jan. 9, 2015)



* We are constantly evaluating our workload and align resources to meet emergent needs. In the short term, the Commission may approve requests for staffing that may exceed office allocations to meet workload challenges. If those workload challenges persist, the Commission may make the adjustment permanent by shifting positions, subject to the total staffing constraint of 419 permanent and term positions.



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