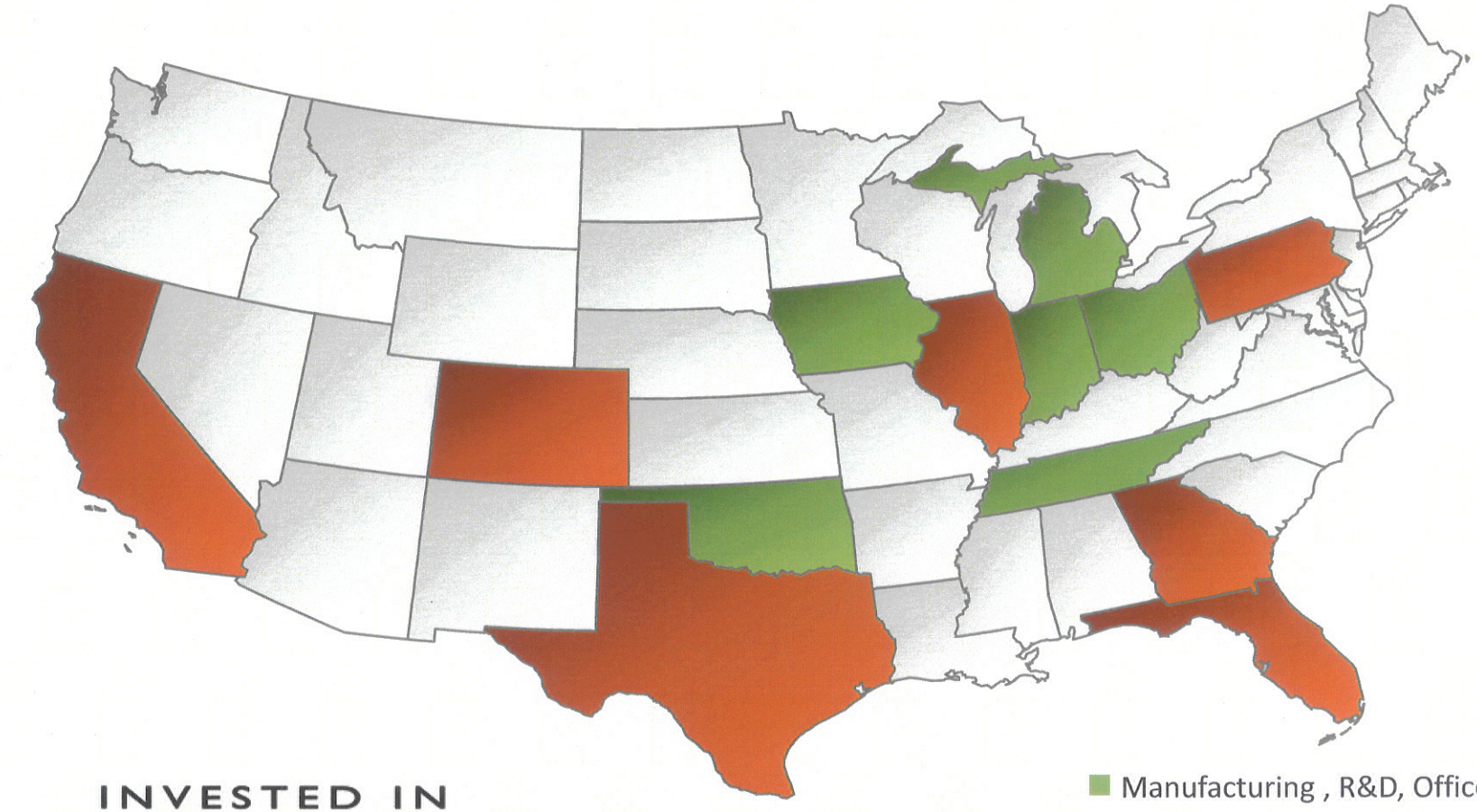
Whirlpool CORPORATION

PETITIONER'S EXHIBITS FOR ITC HEARING

INV. NOS. 701-TA-477 & 731-TA-1180-1181 (FINAL)

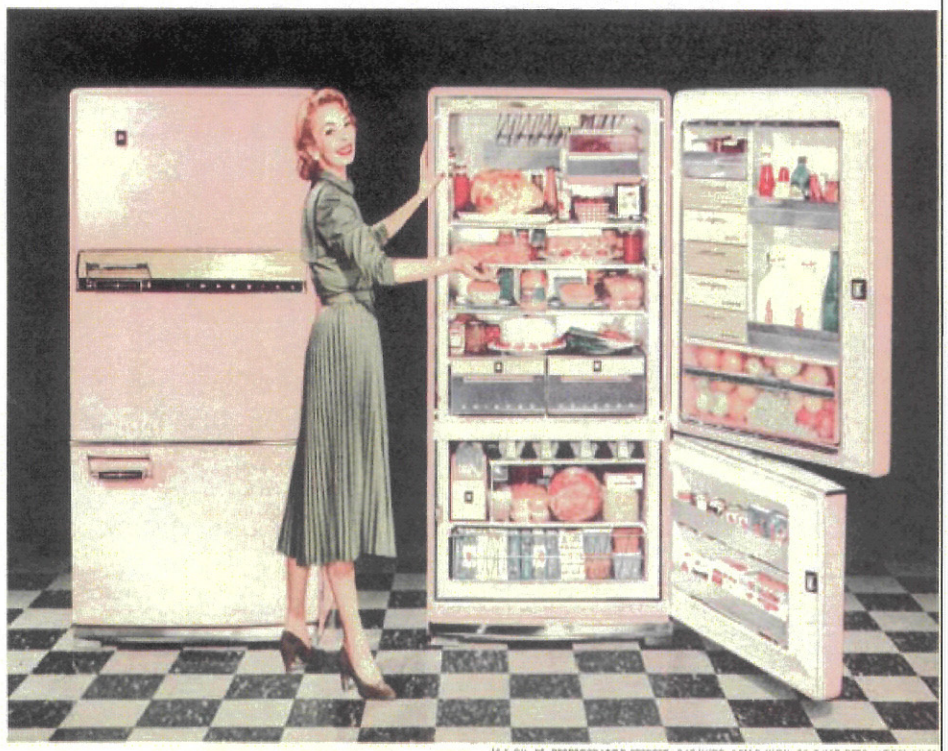
MARCH 13, 2012



INVESTED IN AMERICA

EXHIBIT 1

Whirlpool CORPORATION



13.5 CU. FT. REFRIGERATOR-FREEZER; 34" WIDE, 65½" HIGH, 32 3/16" DEEP, MODEL D1138

NEW! RCA WHIRLPOOL REFRIGERATOR-FREEZER

V THE MAYTAG® ICE$_2$O™

THE FIRST FRENCH DOOR REFRIGERATOR WITH FILTERED WATER AND ICE ON THE DOOR!

THE HOME DEPOT

You can do it. We can help.

MAYTAG

NEW! EXCLUSIVE!

MAYTAG® ICE$_2$O™ STAINLESS STEEL FRENCH DOOR REFRIGERATOR

24.9 Cu. Ft. Also available in high-gloss white, high-gloss black or high-gloss bisque. The largest fresh food capacity available.†

MFI2568AES (Depot Direct 257267)

$2449

12 MONTHS NO PAYMENTS, NO INTEREST

ON ANY MAYTAG ICE$_2$O PURCHASE MADE ON THE HOME DEPOT CONSUMER CREDIT CARD FROM FEBRUARY 2 THROUGH APRIL 30, 2006

Additional terms apply. See page 11 for easy credit terms.

PLUS FREE DELIVERY & HAUL AWAY**

ON ALL APPLIANCE PURCHASES OF $299 OR MORE.

A $50 VALUE BY MAIL-IN REBATE

Additional terms apply. See page 5 for details.

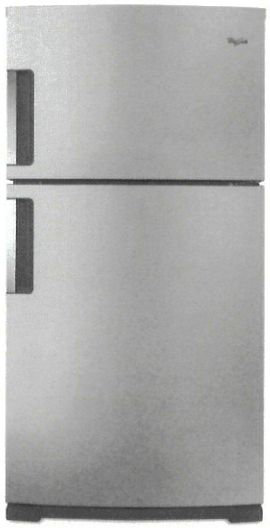
†Among leading brands of refrigerators

EXHIBIT 2

REFRIGERATION PRODUCT CATEGORIES

Whirlpool CORPORATION

TOP MOUNT REFRIGERATORS



Avg. Retail Price:
$520
Freezer on the top

SIDE-BY-SIDE REFRIGERATORS

Avg. Retail Price:
$1033
Freezer on the side

BOTTOM MOUNT REFRIGERATORS

Avg. Retail Price:
$1,620
Freezer on the bottom

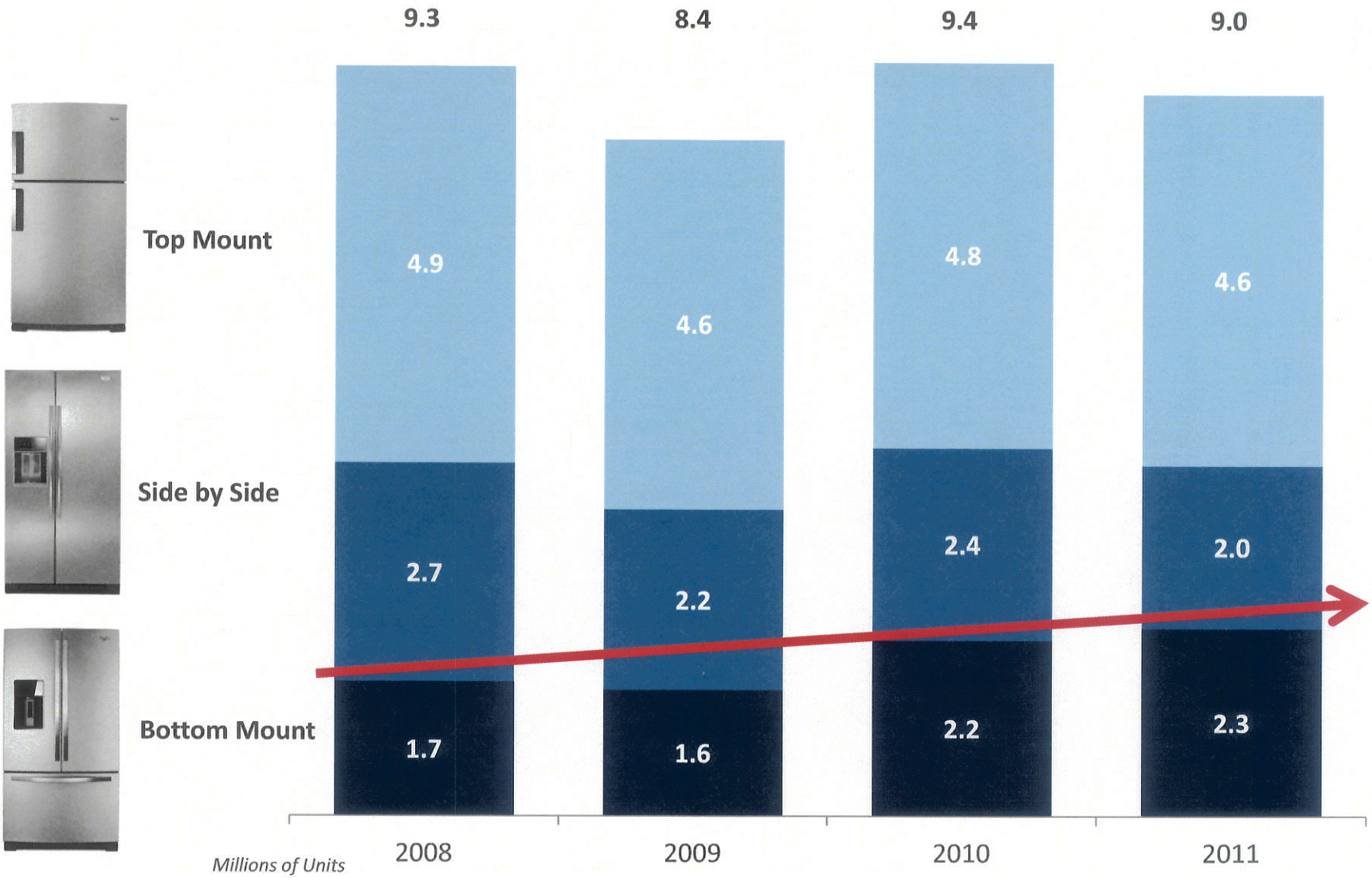
Each product category ...

- ***Has unique thermodynamic characteristics***
- ***Has unique structural design***
- ***Is built on a separate assembly line***

Source: NPD Price Data

EXHIBIT 3

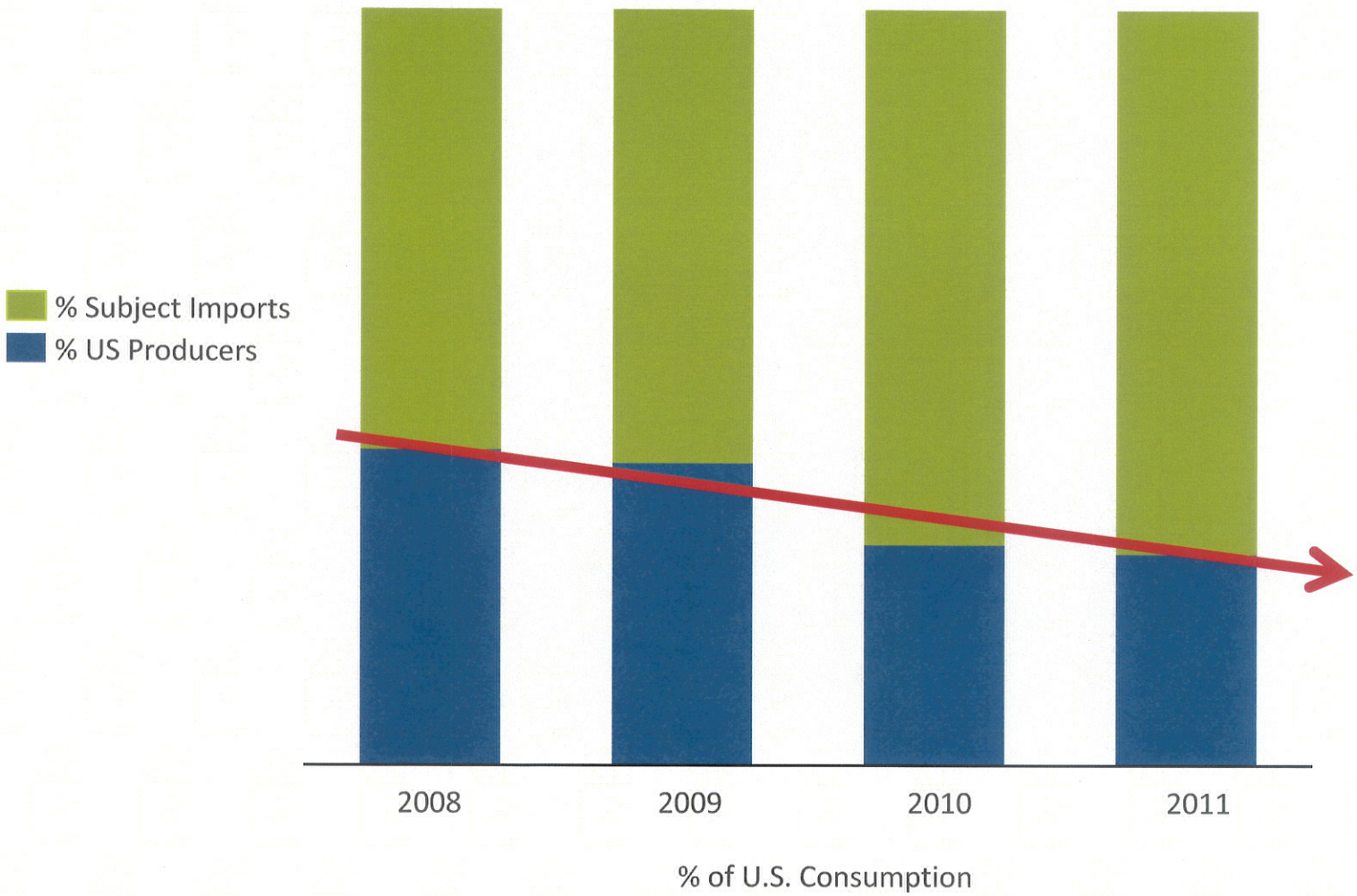
U.S. INDUSTRY REFRIGERATOR SALES VOLUMES



Source: Association of Home Appliance Manufacturers

EXHIBIT 4

BOTTOM MOUNT MARKET SHARE TRENDS: 2008-2011



Source: Association of Home Appliance Manufacturers; Whirlpool Internal Data

EXHIBIT 5

COMPETITORS PARTICIPATE IN FULL PRODUCT SPECTRUM

FEATURE OPTIONS			
MAP	$799 - $2299	$1099 - $3299	$2299 - $3499
CAPACITY	7 - 22 cu ft	20 - 32 cu ft	25 - 30 cu ft
ICE & WATER	Internal / None	External / Internal / None	External / None
E-STAR	Yes / No	Yes / No	Yes
LIGHTING	LED / Traditional	LED / Traditional	LED / Traditional

EXHIBIT 6

BOTTOM MOUNT MARKET COMPOSITION BASED ON CAPACITY

Whirlpool CORPORATION

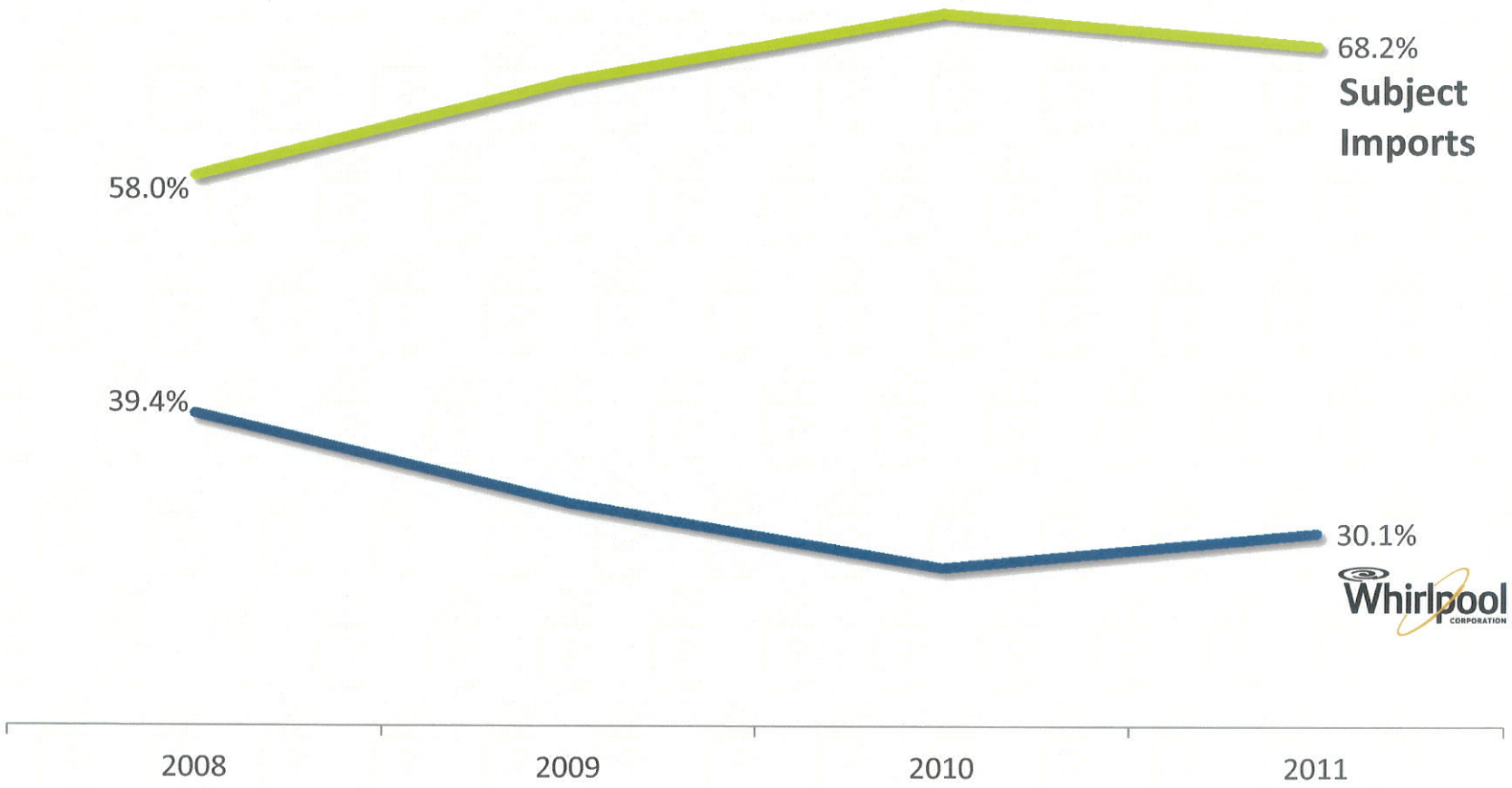
	CUBIC FEET CAPACITY	2008	2009	2010	2011
	6.5-13.4	0.9	0.9	1.3	1.1
	13.5-15.4	1.3	1.4	1.3	1.6
	15.5-17.4	3.2	2.6	2.2	3.2
	17.5-19.4	8.1	6.8	5.3	6.9
Heart of the Market	**19.5-21.4**	**15.3**	**12.6**	**14.3**	**12.7**
	21.5-23.4	**19.1**	**18.1**	**18.3**	**16.0**
	23.5-25.4	**21.5**	**20.5**	**18.6**	**16.4**
	25.5-27.4	**18.4**	**22.4**	**20.8**	**19.7**
	27.5-29.4	7.0	9.1	12.3	13.7
	29.5+	5.1	5.8	5.5	8.7
		100%	100%	100%	100%
	Share 6.5-19.4	13.5	11.7	10.1	12.8
	Share 19.5-27.4	**74.3**	**73.6**	**72.0**	**64.8**
	Share 27.5+	12.1	14.9	17.8	22.4

Source: Traqline as per Home Depot Brief

EXHIBIT 7

19.5-27.4 CU. FT. BOTTOM MOUNT MARKET SHARE

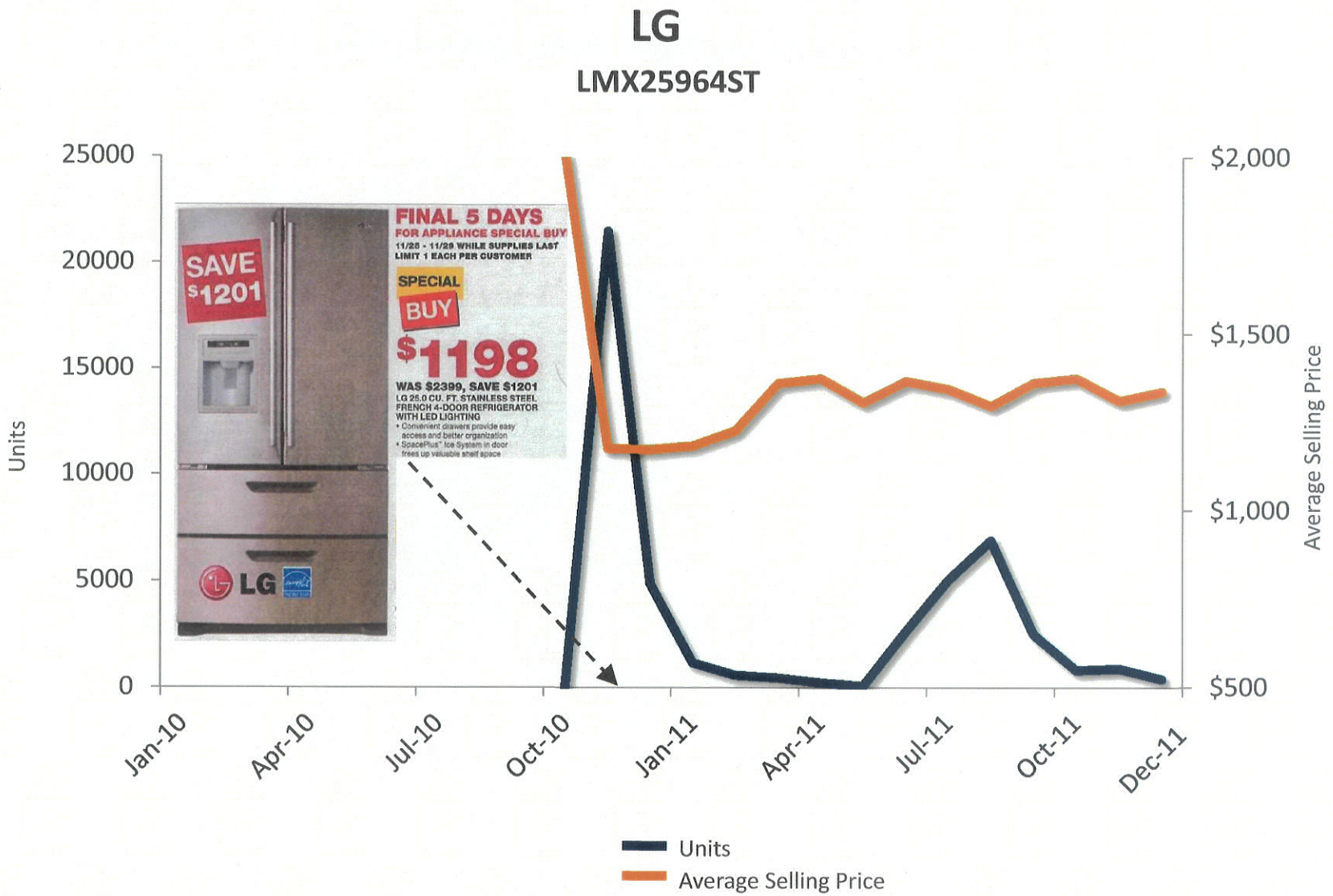
"Heart of the market"



Source: Traqline 2008-2011
**OEM Share of Kenmore Estimated per Whiirlpool Intelligence*

EXHIBIT 8

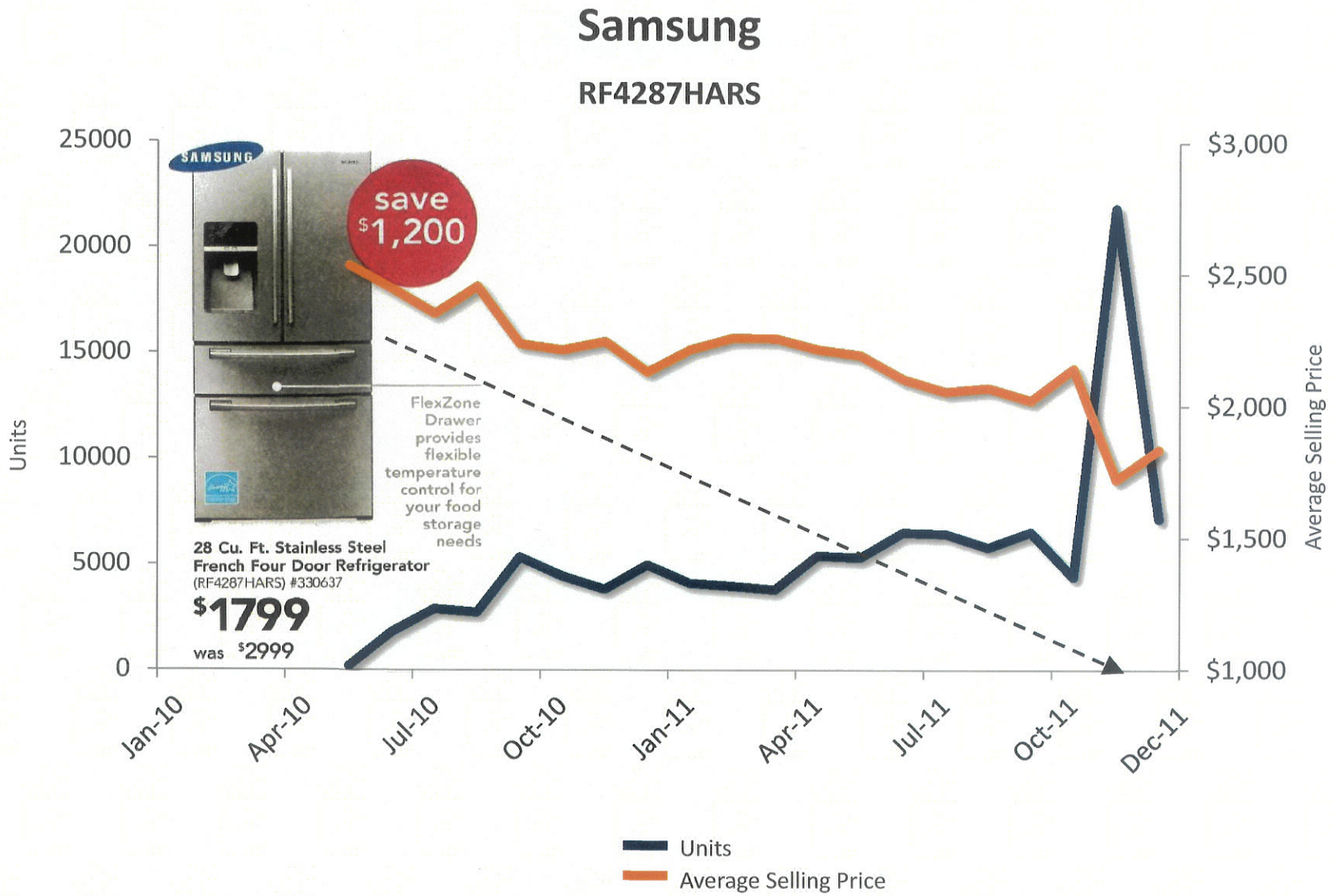
PRICING EXAMPLE #1



*Source: NPD Price Data; **Home Depot** Promotional Flyer, **November 2010***

EXHIBIT 9

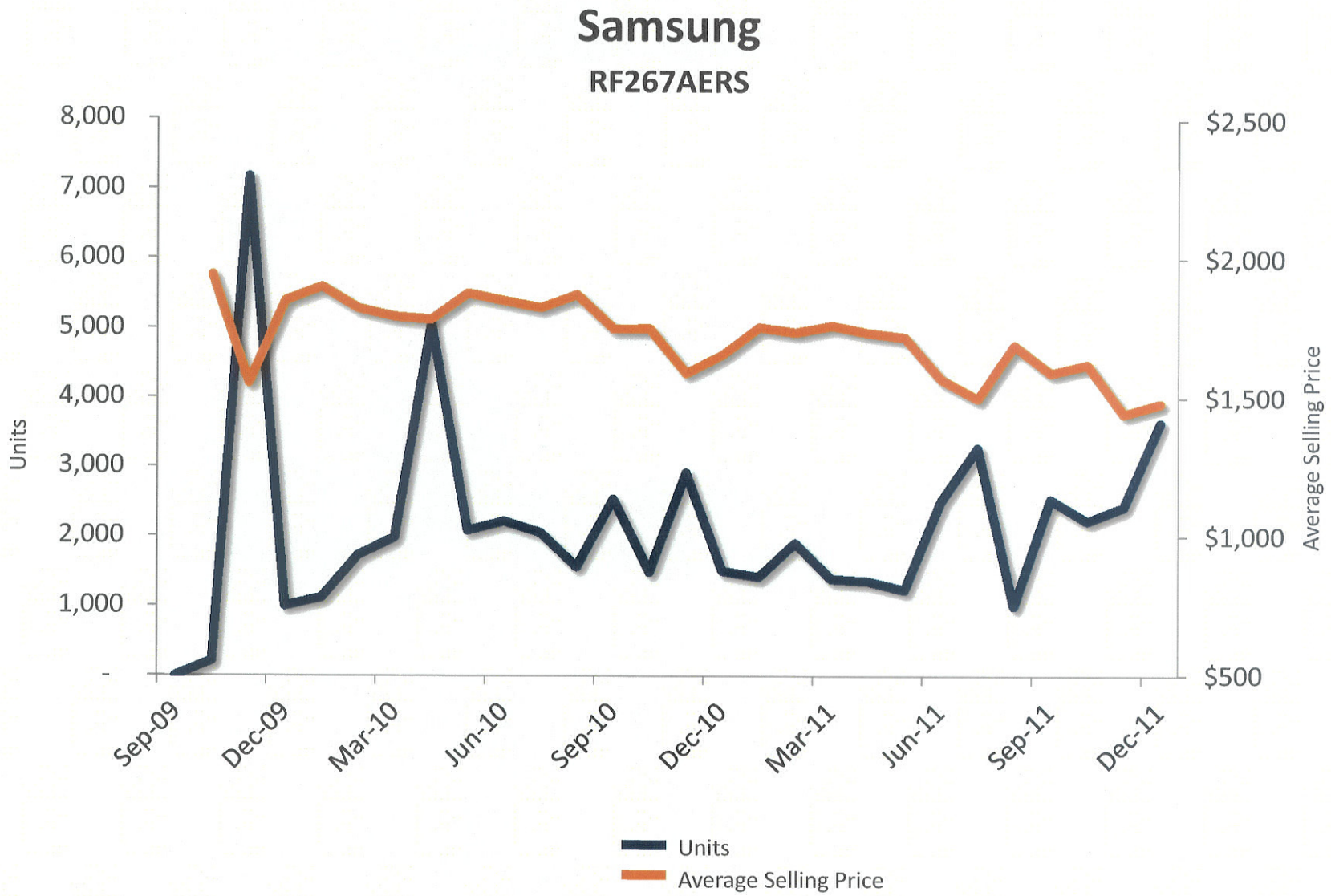
PRICING EXAMPLE #2



Source: NPD Price Data; Lowe's Promotional Flyer, November 2011

EXHIBIT 10

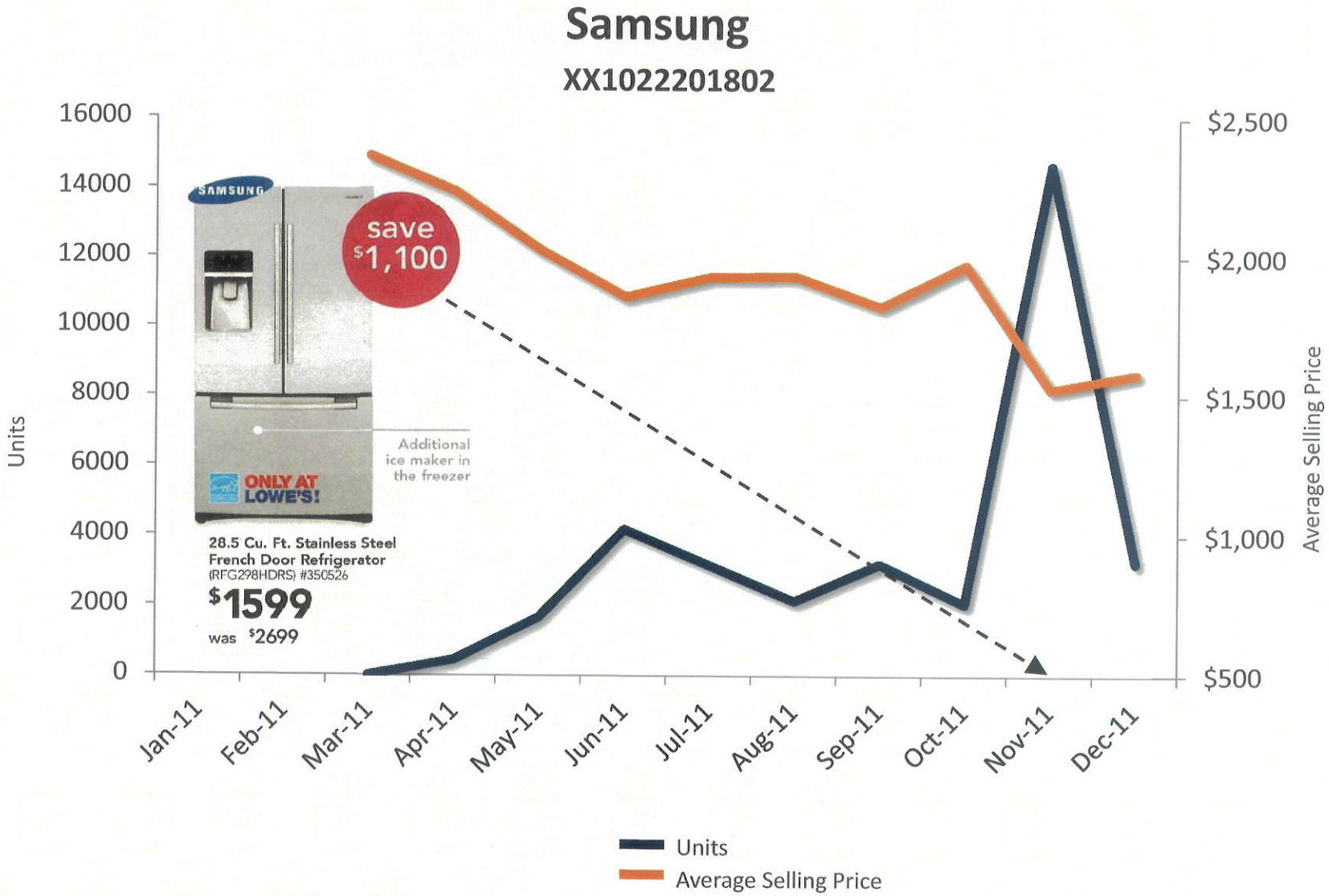
PRICING EXAMPLE #3



Source: NPD Price Data

EXHIBIT 11

PRICING EXAMPLE #4



Source: NPD Price Data; Lowe's Promotional Flyer, November 2011

EXHIBIT 12

PRICING EXAMPLE #5

25 cu. ft.
LED Lighting
External I&W
Single Evap.
E-Star

Maytag
MFX2571XEM

25 cu. ft.
LED Lighting
External I&W
Single Evap.
E-Star

Whirlpool
GZ25FSRXYY*

MONTH	VOLUME	PRICE	VOLUME	PRICE
Oct '11	149	$1,797		
Nov '11	193	$1,671	19,765	$1,253

*Price discounting by retailer
(Promo MAP $1799)

Source: NPD Price Data

EXHIBIT 13

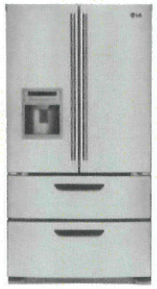
FEATURES MATTER

FEATURE	ESTIMATED MARKET VALUE	SOURCE
Energy Star	$50	Whirlpool Corp.
Capacity	$100/cu. ft.	Samsung (ITC Staff Conference)
Dual Evap.	$150	Whirlpool Corp.
External Ice & Water Dispenser	$700	Samsung (REF Product Lineup Oct. 2010)
LED Lighting	$100	Whirlpool Corp.

EXHIBIT 14

PRICE DEPRESSION IN 4-DOOR SEGMENT

Whirlpool CORPORATION



25 cu. ft.
LED lighting
External I&W
Single Evap.
E-Star
T/D-Freezer

25 cu. ft.
LED lighting
External I&W
Single Evap.
E-Star
T/D-Refrig. Pantry

28 cu. ft.
LED lighting
External I&W
Dual Evap.
E-Star
T/D-Convertible

	LG LMX25964ST		Maytag / Whirlpool MFX2571XEM / GZ25FSRXYY		Samsung RF4287HARS	
QTR.	VOLUME	PRICE	VOLUME	PRICE	VOLUME	PRICE
Q2 '10					2,028	$2,453
Q3 '10			26	$2,561	10,998	$2,320
Q4 '10	26,394	$1,175	2,058	$1,999	13,299	$2,191
Q1 '11	2,249	$1,232	1,847	$2,037	11,934	$2,244
Q2 '11	2,976	$1,366	1,954	$1,849	17,308	$2,167
Q3 '11	14,533	$1,325	498	$1,775	18,859	$2,049
Q4'11	2,144	$1,341	23,501	$1,263	33,507	$1,804

Source: NPD Price Data

EXHIBIT 15

PRICE DEPRESSION IN 3-DOOR SEGMENT

Whirlpool CORPORATION

26 cu. ft.
LED lighting
External I&W
Dual Evap.
E-Star

Samsung
RF267AERS

26 cu. ft.
LED lighting
External I&W
Single Evap.
E-Star

Whirlpool
GI6FDRXXY

29 cu. ft.
LED lighting
External I&W
Dual Evap.
E-Star

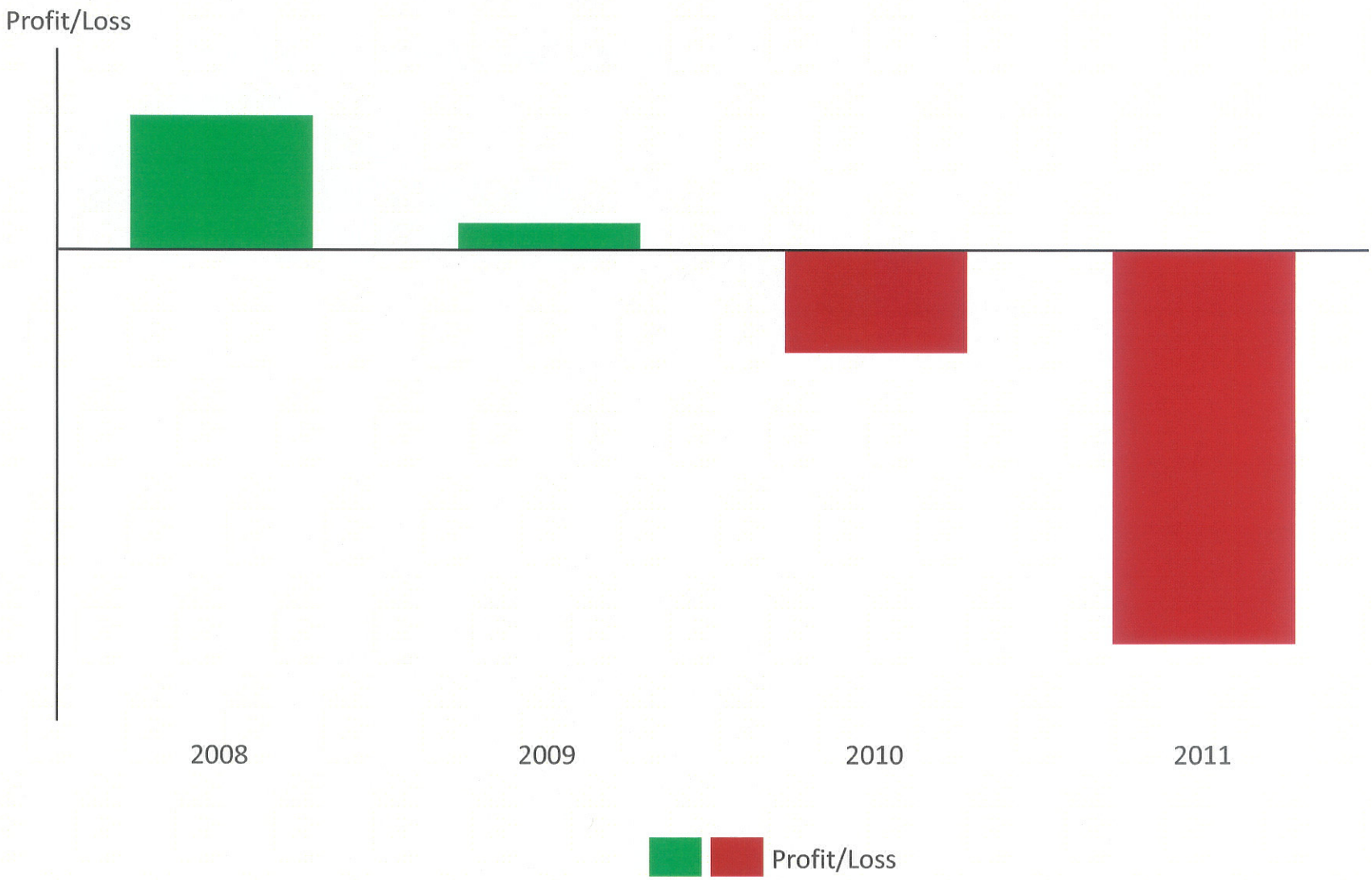
Samsung
XX1022201802*
(RFG298HDRS)

QTR.	VOLUME	PRICE	VOLUME	PRICE	VOLUME	PRICE
Q3 '10	6,171	$1,806				
Q4 '10	5,932	$1,648	819	$1,718		
Q1 '11	4,735	$1,751	1,459	$1,685	2	$2,365
Q2 '11	5,131	$1,651	1,901	$1,641	6,327	$1,930
Q3 '11	6,846	$1,563	1,792	$1,503	8,556	$1,882
Q4'11	8,324	$1,510	1,219	$1,583	20,004	$1,583

Source: NPD Price Data;
**Whirlpool Intelligence: Masked SKU XX1022201802 = RFG298HDRS*

EXHIBIT 16

WHIRLPOOL HAS BEEN INJURED



Source: Whirlpool Internal Data

EXHIBIT 17

SAMSUNG & LG ON A MISSION TO DOMINATE THE MARKET

Whirlpool CORPORATION

THE KOREA TIMES

Samsung aims to beat Whirlpool

September 16, 2010

THE WALL STREET JOURNAL.

"The investment in 2010 [in appliances] nearly totaled around a trillion won… **and we expect that will eventually pay off somewhat.**"

Samsung, January 12, 2011

"We will make continuous efforts to make the business globally competitive in the next one, two, three years, at which point, we expect [appliance] division is to be profitable."

Samsung Q2-2010 Earnings Call, January 12, 2011

LG Life's Good

"LG's primary goal this year is to strengthen its business foundations so that it can achieve **the top position in the home appliance category by 2014**."

Moon-bum Shin, January 16, 2012

THE KOREA TIMES

Samsung is very confident of becoming the world's top manufacturer of refrigerators in 2011…"

"Our goal is simple – the biggest producer of home appliances by 2013."

Hong Chang-wan, Samsung

EXHIBIT 18