

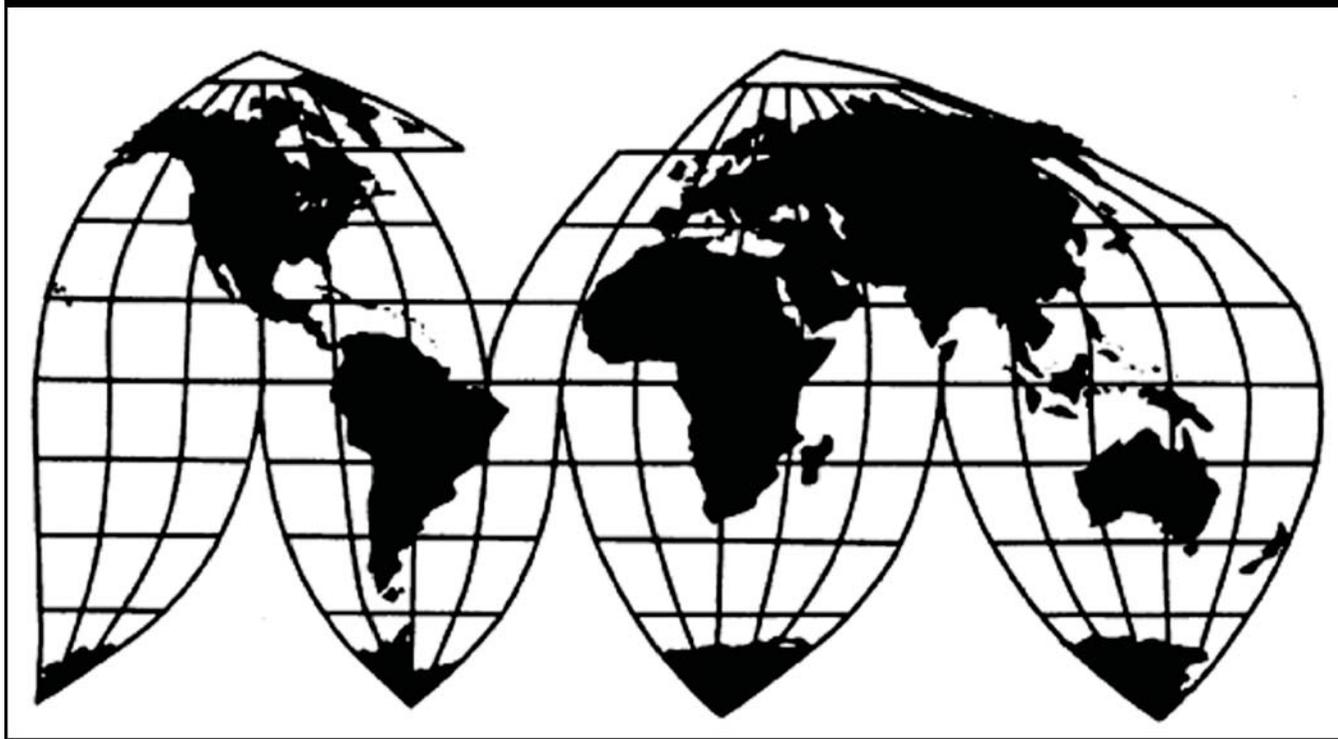
Ironing Tables and Certain Parts Thereof from China

Investigation No. 731-TA-1047 (Review)

Publication 4155

June 2010

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

	<i>Page</i>
Determination	1
Views of the Commission	3
Part I: Introduction and overview	I-1
Background	I-1
The original investigation	I-2
Summary data	I-2
Statutory criteria and organization of the report	I-3
Statutory criteria	I-3
Organization of the report	I-4
Commerce's reviews	I-5
Administrative reviews	I-5
Five-year reviews	I-6
Distribution of Continued Dumping and Subsidy Offset Act funds	I-6
The subject merchandise	I-7
Commerce's scope	I-7
Tariff treatment	I-8
The domestic like product	I-8
Description and applications	I-8
Manufacturing processes	I-9
Domestic like product issues	I-11
U.S. market participants	I-11
U.S. producer	I-11
U.S. importers	I-12
U.S. purchasers	I-14
Apparent U.S. consumption and market shares	I-14
Part II: Conditions of competition in the U.S. market	II-1
U.S. channels of distribution	II-1
Regional sales	II-2
U.S. market characteristics	II-3
Purchases of ironing tables before and after the order	II-4
Information on suppliers of ironing tables	II-4
Supply and demand considerations	II-5
U.S. supply	II-5
U.S. demand	II-9
Substitutability issues	II-16
Factors affecting purchasing decisions	II-18
Comparisons of domestic products, subject imports, and nonsubject imports	II-19
Elasticity estimates	II-23
U.S. supply elasticity	II-23
U.S. demand elasticity	II-23
Substitution elasticities	II-23

CONTENTS

	<i>Page</i>
Part III: Condition of the U.S. industry	III-1
Overview	III-1
U.S. producer's capacity, production, and capacity utilization	III-2
U.S. producer's shipments	III-2
U.S. producer's inventories	III-2
U.S. producer's imports and purchases	III-3
U.S. producer's employment, wages, and productivity	III-3
Financial experience of U.S. producer	III-4
Background	III-4
Operations on ironing tables	III-4
Variance analysis	III-5
Capital expenditures research and development expenses	III-5
Assets and return on investment	III-6
Part IV: U.S. imports and the foreign industry	IV-1
U.S. imports	IV-1
Overview	IV-1
Imports from subject and nonsubject sources	IV-1
U.S. importers' inventories	IV-3
U.S. importers' imports subsequent to 31, 2009	IV-3
The industry in China	IV-3
Overview	IV-3
Ironing tables operations	IV-3
Global market	IV-6
Demand	IV-6
Supply	IV-7
Prices	IV-9
Part V: Pricing and related information	V-1
Factors affecting	V-1
Raw materials	V-1
U.S. inland transportation costs	V-1
Pricing practices	V-2
Line reviews	V-3
Importance of product features	V-4
Price data	V-7
Price trends	V-12
Price comparisons	V-13

CONTENTS

	<i>Page</i>
Appendixes	
A. <i>Federal Register</i> notices	A-1
B. Hearing witnesses	B-1
C. Summary table	C-1
D. Responses of U.S. producer, U.S. importers, U.S. purchasers, and foreign producers concerning the significance of the antidumping duty finding and the likely effects of revocation	D-1
E. U.S. producer's selling prices of products 1 and 3 combined, and U.S. importers' selling prices of the Chinese products 3 and 4 combined	E-1

Note.—Information that would reveal confidential operations of individual concerns may not be published and therefore has been deleted from this report. Such deletions are indicated by asterisks.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1047 (Review)

IRONING TABLES AND CERTAIN PARTS THEREOF FROM CHINA

DETERMINATION

On the basis of the record¹ developed in the subject five-year review, the United States International Trade Commission (Commission) determines, pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)), that revocation of the antidumping duty on ironing tables and certain parts thereof from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted this review effective July 1, 2009 (74 F.R. 31755, July 2, 2009) and determined on October 5, 2009 that it would conduct a full review (74 F.R. 54066, October 21, 2009). Notice of the scheduling of the Commission's review and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on November 30, 2009 (74 F.R. 62593). The hearing was held in Washington, DC, on April 13, 2010, and all persons who requested the opportunity were permitted to appear in person or by counsel.

¹ The record is defined in sec. 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR § 207.2(f)).

VIEWS OF THE COMMISSION

Based on the record in this five-year review, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Act”), that revocation of the antidumping duty order on ironing tables and certain parts thereof from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. BACKGROUND

A. The Original Determination

On July 29, 2004, the Commission determined that an industry in the United States was being materially injured by reason of imports of ironing tables from China that were being sold at less than fair market value.¹ Subsequently, the U.S. Department of Commerce (“Commerce”) issued an antidumping duty order covering these imports.²

B. The Current Review

The Commission instituted this five-year review effective July 1, 2009.³ The Commission received five responses to the notice of institution: from domestic producer Home Products International, Inc. (“HPI”), from Chinese manufacturer and exporter Since Hardware (Guangzhou) Co., Ltd. (“Since Hardware”), and from three U.S. importers of the subject merchandise - Whitney Design, Polder Inc. (“Polder”), and Group SEB USA Inc. On October 5, 2009, the Commission determined that the individual responses, the domestic interested party group response, and the respondent interested party group response to the notice of institution were adequate. Accordingly, the Commission determined to proceed to a full review.⁴

One U.S. producer, HPI, accounting for 100 percent of U.S. production of ironing tables in 2009, provided a complete response to the Commission’s questionnaire.⁵ The Commission received usable

¹ Ironing Tables and Certain Parts Thereof from China, Inv. No.731-TA-1047 (Final), USITC Pub. 3711 (July 2004) (“Original Investigation”). Commissioner Pearson found that the domestic industry was not materially injured by reason of the subject imports, but, rather, was threatened with material injury by reason of subject imports sold at less than fair value. Original Investigation at 31-45.

² Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof from the People’s Republic of China, 69 Fed. Reg. 47868 (August 6, 2004).

³ 74 Fed. Reg. 31755 (July 2, 2009).

⁴ 74 Fed. Reg. 54066 (October 21, 2009); see also Explanation of Commission Determinations on Adequacy, reprinted in Confidential Staff Report (“CR”), INV-HH-047 (May 7, 2010), as amended by INV-HH-052 (May 13, 2010), Public Report (“PR”) at App. A.

⁵ CR at I-20, PR at I-11.

questionnaire responses from 10 importers and 13 U.S. purchasers of ironing tables,⁶ and six responses to foreign producer questionnaires from ironing tables producers in China.⁷

II. DOMESTIC LIKE PRODUCT

In making its determination under section 751(c) of the Act, the Commission defines “the domestic like product” and the “industry.”⁸ The Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”⁹ The Commission’s practice in five-year reviews is to look to the like product definition from the original determination and any completed reviews and consider whether the record indicates any reason to revisit the prior findings.¹⁰

In its expedited five-year review determination, Commerce defined the subject merchandise as ironing tables and certain parts thereof:

For the purposes of this order, the product covered consists of floor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with various features, including iron rests, linen racks, and others. The subject ironing tables may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this order.

Furthermore, the order specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof.

* * *

Ironing tables without legs (such as models that mount on walls or over doors) are not floor-standing and are specifically excluded. Additionally, tabletop or countertop models

⁶ CR at I-21 to I-23, PR at I-12 to I-14, and CR/PR at Table I-6. We rely upon import data submitted in response to the Commission’s importer questionnaires, rather than Customs data, as the latter appear to have discrepancies. Eleven of the 13 importers listed in the Customs data as having imported at least *** units from China or from other countries reported to the Commission that they did not import any ironing tables during the period examined. CR at IV-2 n.4, PR at IV-1 n.4.

⁷ CR at IV-5, PR at IV-3 to IV-4. The Commission sent foreign producer questionnaires to 31 known Chinese producers of ironing tables and received usable data from the following six Chinese producers: Forever Holdings Ltd. (“Forever Holdings”), Foshan Shunde Yongjian Housewares & Hardware Co., Ltd. (“Foshan Shunde”), Greenwood Houseware (Zhuhai) Ltd. (“Greenwood”), Harvest International Housewares (“Harvest”), Heshan Zhishan Hengfeng Metal Co., Ltd. (“Heshan”), and Since Hardware (Guangzhou) Co. Ltd. (“Since Hardware”). *Id.*

⁸ 19 U.S.C. § 1677(4)(A).

⁹ 19 U.S.C. § 1677(10); *see, e.g., Cleo, Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

¹⁰ *See, e.g., Internal Combustion Industrial Forklift Trucks From Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (December 2005); *Crawfish Tail Meat From China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar From Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (February 2003).

with short legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded.¹¹

Ironing tables are used in households, hotel rooms, and workplaces for the purpose of pressing apparel and other textile items. The standard size of an ironing table is 48 to 54 inches in length and 13 to 18 inches in width. The table may be equipped with special features such as an iron rest or linen racks. Ironing tables and their components are produced from flat-rolled steel and wire, as well as fasteners, plastic fittings, foam, and textile fabric. The principal components of an ironing table are its metal ironing surface, legs, feet, slide bar, handle, hangers, ribs, and foot cover. The ironing surface is either mesh-top or perforated-top and is attached to a T-leg stand in the most popular configuration as well as other leg configurations, such as the 4-leg stand. A T-leg ironing table is made of a single metal tube inserted into a metal leg base that is shaped as an inverted “T.” A 4-leg ironing table has two legs, each made of two metal tubes that run parallel to each other, which flare out to form a 4-footed base on the floor, and typically have a cross brace at or near the flare or at the end of the tubes. In each system, users press a lever that allows the legs to drop down and subsequently adjust the height of the table or fold the unit flat for storage.¹²

The scope definition set out above is unchanged from Commerce’s original scope determination. In the Commission’s original investigation, it defined a single domestic like product as ironing tables and certain parts thereof, commensurate with the scope of the investigation.¹³

No new facts have been presented to warrant a conclusion regarding the domestic like product that is different from the domestic like product identified in the Commission’s original investigation. Moreover, HPI and the other interested parties have indicated that they agree with the Commission’s definition of the domestic like product in the original investigation.¹⁴ Therefore, we find that the appropriate definition of the domestic like product in this full five-year review is ironing tables and certain parts thereof, the same as Commerce’s scope and unchanged from the Commission’s original determination.

III. DOMESTIC INDUSTRY

Section 771(4)(A) of the Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product

¹¹ Floor-Standing Metal-Top Ironing Tables and Certain Parts Thereof from the People’s Republic from China: Final Results of Expedited Five-Year (Sunset) Review of Antidumping Duty Order, 74 Fed. Reg. 56794, 56794-95 (November 3, 2009).

¹² CR at I-15 to I-16, PR at I-9.

¹³ Original Investigation at 11. In the preliminary phase of the original investigation, the Commission determined that there was one domestic like product consisting of floor-standing, metal-top ironing tables, coextensive with the scope. Ironing Tables and Components Thereof from China, Inv. No. 731-TA-1047 (Preliminary), USITC Pub. 3623 (August 2003), at 5. In the final phase of the original investigation, Commission staff gathered data pertaining to over-the-door, wall-mounted, and countertop boards. Original Investigation, USITC Pub. 3711, at 8. The Respondents in the original investigation had argued that the Commission should expand the domestic like product beyond the scope of the investigation to include over-the-door boards. In the final determination, however, the Commission again found one domestic like product, co-extensive with the scope. Id. at 4-11.

¹⁴ HPI’s Response to the Notice of Institution at 39 and Prehearing Brief at 9; Polder Response to the Notice of Institution at 8; Whitney Design Response to the Notice of Institution at 9; and Since Hardware Response to the Notice of Institution at 7.

constitutes a major proportion of the total domestic production of the product.”¹⁵ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market. Section 771(4)(B) of the Act, the related parties provision, allows the Commission to exclude certain domestic producers from the domestic industry that import subject merchandise or have a corporate affiliation with importers or exporters of subject merchandise, if the Commission finds that appropriate circumstances exist.¹⁶

In its original determination, the Commission defined the domestic industry as all domestic producers of ironing tables.¹⁷ During the period examined in the current review, there is no new evidence to warrant a change in the definition of the domestic industry, and no party has raised an objection to the domestic industry definition from the original investigation.¹⁸ Therefore, based on our definition of the domestic like product, we define the domestic industry to include all U.S. producers of the domestic like product.¹⁹

IV. LIKELIHOOD OF CONTINUATION OR RECURRENCE OF MATERIAL INJURY IF THE ANTIDUMPING DUTY ORDER IS REVOKED

A. Legal Standard

In a five-year review conducted under section 751(c) of the Act, Commerce will revoke an antidumping or countervailing duty order unless (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”²⁰ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a

¹⁵ 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. See 19 U.S.C. § 1677.

¹⁶ 19 U.S.C. § 1677 (4)(B).

¹⁷ Original Investigation at 12-13. In the original investigation, both domestic producers, HPI and Whitney Design, were related parties, as defined in the statute, because they imported subject merchandise during the period examined. The Commission found, however, that appropriate circumstances did not exist to exclude either producer from the domestic industry. Id.

¹⁸ 19 U.S.C. § 1677(4)(B). The Respondents alleged, solely in their discussion of conditions of competition, that HPI is either an importer of the subject merchandise or has facilitated the importation of subject merchandise as a purchaser for a third party in the United States through an agreement with a Chinese producer. See, e.g., Respondents’ Prehearing Brief at 1-4 and Posthearing Brief at 3-5. Although there is a ***, there is no evidence on the record that HPI imported subject merchandise or that HPI was the importer of record for subject merchandise during the period examined other than the ***. Rather, HPI is sourcing nonsubject merchandise, such as ***, from ***. CR/PR at Table III-5; see also HPI Posthearing Brief at Exhibit 2 and Answers to Questions from the Commission (Chairman Aranoff and Commissioners Lane, Okun, and Williamson) at A-13 to A-14.

¹⁹ HPI imported a *** quantity of subject merchandise *** and, therefore, is a related party under the statute. We find, however, that appropriate circumstances do not exist to exclude HPI from the domestic industry as a related party. HPI imported *** quantities of the subject merchandise ***, representing only *** percent of its production in that year, and has not imported any subject merchandise since that time. Thus, its interest appears to be in domestic production rather than importation of the subject merchandise. In addition, HPI is the sole remaining domestic producer and supports the continuation of the order. CR/PR at Table I-5.

²⁰ 19 U.S.C. § 1675a(a).

proceeding and the elimination of its restraining effects on volumes and prices of imports.”²¹ Thus, the likelihood standard is prospective in nature.²² The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.^{23 24 25}

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”²⁶ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”²⁷

Although the standard in a five-year review is not the same as the standard applied in an original antidumping duty investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”²⁸ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if the orders are revoked or the suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. §

²¹ SAA at 883-84. The SAA states that “[t]he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

²² Although the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

²³ See NMB Singapore Ltd. v. United States, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), aff’d mem., 140 Fed. Appx. 268 (Fed. Cir. 2005); Nippon Steel Corp. v. United States, 26 CIT 1416, 1419 (2002) (same); Usinor Industeel, S.A. v. United States, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion”; “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); Indorama Chemicals (Thailand) Ltd. v. United States, Slip Op. 02-105 at 20 (Ct. Int’l Trade Sept. 4, 2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); Usinor v. United States, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

²⁴ For a complete statement of Commissioner Okun’s interpretation of the likely standard, see Additional Views of Vice Chairman Deanna Tanner Okun Concerning the “Likely” Standard in Certain Seamless Carbon and Alloy Steel Standard, Line and Pressure Pipe From Argentina, Brazil, Germany, and Italy, Invs. Nos. 701-TA-362 (Review) and 731-TA-707 to 710 (Review)(Remand), USITC Pub. 3754 (Feb. 2005).

²⁵ Commissioner Lane notes that, consistent with her views in Pressure Sensitive Plastic Tape From Italy, Inv. No. AA1921-167 (Second Review), USITC Pub. 3698 (June 2004), she does not concur with the U.S. Court of International Trade’s interpretation of “likely,” but she will apply the Court’s standard in these reviews and all subsequent reviews until either Congress clarifies the meaning or the U.S. Court of Appeals for the Federal Circuit addresses this issue.

²⁶ 19 U.S.C. § 1675a(a)(5).

²⁷ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

²⁸ 19 U.S.C. § 1675a(a)(1).

1675(a)(4).²⁹ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.³⁰

In evaluating the likely volume of imports of subject merchandise if the orders under review are revoked and the suspended investigations are terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.³¹ In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.³²

In evaluating the likely price effects of subject imports if the orders and finding under review were revoked, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.³³

In evaluating the likely impact of imports of subject merchandise if the orders and finding under review are revoked, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.³⁴ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the order at issue and whether the industry is vulnerable to material injury if the order were revoked.³⁵

When appropriate in this review, we have relied on the facts otherwise available, which consist of information from the original investigation and information submitted in this review, including

²⁹ 19 U.S.C. § 1675a(a)(1). We note that no duty absorption findings have been made by Commerce.

³⁰ 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

³¹ 19 U.S.C. § 1675a(a)(2).

³² 19 U.S.C. § 1675a(a)(2)(A-D).

³³ See 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

³⁴ 19 U.S.C. § 1675a(a)(4).

³⁵ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission "considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports." SAA at 885.

information provided by the domestic industry, the respondent interested parties, questionnaire responses, and information available from published sources.^{36 37}

B. Conditions of Competition and Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”³⁸

1. The Commission’s Original Determination

In the original investigation, the Commission found several conditions of competition pertinent to its analysis. With respect to demand, the Commission found that the market for ironing tables was relatively stable over the period examined, that the market was described as mature with only modest growth, and that the overall demand for ironing tables was likely to exhibit little change in response to changes in price.³⁹ The Commission found that far more lower-priced than higher-priced models entered the U.S. market, with more than three-quarters of U.S. consumption over the period examined reportedly in the opening price point category.⁴⁰ In addition, the Commission found increased concentration among buyers as the number of retail purchasers fell over the period examined, with only a few mass merchandisers dominating direct sales to consumers.⁴¹

With respect to supply, the Commission found that the domestic industry’s share of the market declined steadily and significantly between 2001 and 2003.⁴² The Commission found that one U.S. producer, HPI, closed a plant and consolidated production, while the other U.S. producer, Whitney Design, closed its U.S. production facility during the period examined. Nonetheless, the Commission found that the domestic industry still had *** capacity to supply the U.S. market. Subject imports,

³⁶ 19 U.S.C. § 1677e(a) authorizes the Commission to “use the facts otherwise available” in reaching a determination when (1) necessary information is not available on the record or (2) an interested party or any other person withholds information requested by the agency, fails to provide such information in the time or in the form or manner requested, significantly impedes a proceeding, or provides information that cannot be verified pursuant to 19 U.S.C. § 1677m(i). The verification requirements in 19 U.S.C. § 1677m(i) are applicable only to Commerce. See Titanium Metals Corp. v. United States, 155 F. Supp. 2d 750, 765 (Ct. Int’l Trade 2002) (“the ITC correctly responds that Congress has not required the Commission to conduct verification procedures for the evidence before it, or provided a minimum standard by which to measure the thoroughness of Commission investigations.”).

³⁷ Commissioner Okun notes that the statute authorizes the Commission to take adverse inferences in five-year reviews, but such authorization does not relieve the Commission of its obligation to consider the record evidence as a whole in making its determination. See 19 U.S.C. § 1677e. She generally gives credence to the facts supplied by the participating parties and certified by them as true, but bases her decision on the evidence as a whole, and does not automatically accept participating parties’ suggested interpretations of the record evidence. Regardless of the level of participation, the Commission is obligated to consider all evidence relating to each of the statutory factors and may not draw adverse inferences that render such analysis superfluous. “In general, the Commission makes determinations by weighing all of the available evidence regarding a multiplicity of factors relating to the domestic industry as a whole and by drawing reasonable inferences from the evidence it finds most persuasive.” SAA at 869.

³⁸ 19 U.S.C. § 1675a(a)(4).

³⁹ Original Investigation at 13-14.

⁴⁰ Original Investigation at 14.

⁴¹ Original Investigation at 14-15.

⁴² Original Investigation at 15-16.

however, captured nearly *** of the U.S. market in 2003 compared to *** percent in 2001.⁴³ The Commission found that sales of nonsubject ironing tables were almost nonexistent and consisted mostly of higher-value products.⁴⁴

The Commission found that there was a relatively high degree of substitutability between domestic ironing tables and the subject imports, with the vast majority of all market participants reporting that they were always interchangeable.⁴⁵

2. The Current Review

We find the following conditions of competition relevant to our determination.

a. Demand

Overall U.S. demand for ironing tables moves in tandem with general economic activity in the U.S. economy, and with household formation and home purchases in particular.⁴⁶ U.S. demand for ironing tables also exhibits some seasonal variation and is subject to cyclical fluctuations.⁴⁷ As a consumer durable good, ironing table purchases are often deferrable and, as such, tend to fall during economic downturns.⁴⁸

Market participants provided mixed responses when asked whether demand had increased, decreased, fluctuated, or remained the same since January 2004, but most frequently indicated there had been no change.⁴⁹ The demand for ironing tables as measured by apparent U.S. consumption fluctuated over the period examined, but decreased overall from *** units in 2004 to *** units in 2009. This downturn in demand was particularly strong in 2009, when apparent U.S. consumption fell by *** percent from the previous year.⁵⁰ With respect to future demand, the majority of market participants expected no change.⁵¹

⁴³ Original Investigation, Confidential Staff Report, INV-BB-087 (July 2, 2004), at Table C-1.

⁴⁴ Original Investigation at 15.

⁴⁵ Original Investigation at 16.

⁴⁶ Original Investigation at II-3, fn. 9.

⁴⁷ Retailer demand is reportedly high during the summer months, reflecting new household formation and back-to-college purchases, and household consumer demand is high during the summer and into the fall, with some increase in consumer demand also during March-April, when care for clothes reportedly increases. Retailer and consumer demand tend to be low after the back-to-college purchases, particularly during October-December, including the Christmas holiday season. CR at II-16, PR at II-10.

⁴⁸ Demand for consumer durable goods, especially at the higher price points, has a tendency to be income elastic. An exception may be that some consumers may purchase ironing tables in an economic downturn as a substitute for more expensive dry cleaning services. See Hearing Transcript at 142-143 (Cooper and Scott). Such countercyclical demand is likely a small part of total demand for ironing tables. CR at II-15 and n.28, PR at II-9 and n.28. Replacement demand is also likely a small part of total demand for ironing tables, as consumers replace them infrequently. CR at II-15 and n.27, PR at II-9 and n.27.

⁴⁹ CR at II-19, PR at II-12 to 11-13.

⁵⁰ CR/PR at Table C-1.

⁵¹ CR at II-19, PR at II-12 to II-13.

Ironing tables reportedly are sold in as many as five different retail price point categories.⁵² More than three quarters of ironing tables consumed in the United States reportedly are in the “opening price point” category.⁵³ During the period examined, U.S. imports of ironing tables from China were exclusively mesh-top, while the majority of domestic ironing tables were perforated-top.⁵⁴ Although HPI has the capability to produce both mesh-top and perforated-top tables, the ***.⁵⁵ Chinese manufacturers, by contrast, reportedly produce only mesh-top ironing tables using a labor-intensive production process.⁵⁶

Direct shipments of ironing tables during the period were principally to retailers, followed by commercial users and distributors.⁵⁷ The largest purchasers of ironing tables during the period examined were ***, with each retailer purchasing more than *** ironing tables during the period.⁵⁸ Retailers sold their ironing tables almost exclusively to household consumers. Commercial users consist primarily of the hospitality industry, where ironing tables are used in hotels and motels by travelers, and healthcare facilities.⁵⁹ Purchasers most frequently identified Walmart and Target as retail price leaders in the U.S. market.⁶⁰

b. Supply

HPI is currently the only domestic producer of ironing tables.⁶¹ The domestic industry’s annual capacity was unchanged from 2004 to 2009 at *** units.⁶² The industry’s share of the U.S. market fluctuated between a low of *** percent and a high of *** percent.⁶³ Subject imports’ share fluctuated between a low of *** percent and a high of *** percent.⁶⁴ Nonsubject import’s market share fell in each

⁵² CR at I-15, PR at I-9. HPI describes the “value” or “opening price point” T-leg table as a perforated-top or a mesh-top table costing \$18 or less; a “good” table as generally a mesh-top 4-leg table with an optional iron rest costing \$18 to \$28; a “better” table as a heavy duty mesh-top 4-leg table with an added feature, such as an iron rest, costing \$28 to \$40; a “best” table as a wide-top mesh-top, heavy duty/professional 4-leg ironing table with added features, such as an iron rest and linen rack, costing \$40 to \$70; and a “specialty” table as one with a wide top and such features as an extension cord, wheels, or other special finishes. CR at I-15, PR at I-9.

⁵³ CR at I-15, PR at I-9.

⁵⁴ CR at I-15, PR at I-9 and CR/PR at Tables V-1 through V-6, presenting the relative sales volumes of mesh-top and perforated-top ironing tables. ***. CR at I-16, PR at I-9 to I-10.

⁵⁵ CR at I-15, PR at I-9.

⁵⁶ CR at I-15, PR at I-9.

⁵⁷ CR/PR at II-1 and Table II-1. Twelve of 13 purchasers responding to the Commission’s questionnaires were retailers and one was a distributor. CR/PR at II-2 n.4

⁵⁸ CR/PR at Table II-2. These retailers account for approximately *** percent of the reported purchases of ironing tables at the wholesale level in the United States during the period examined. Calculated from CR/PR at Table II-2. *** combined account for ***. Id.; see also HPI Final Comments (May 27, 2010) at 9.

⁵⁹ U.S. Producer and Importer Questionnaire Responses at sections IV-21a and III-22a, respectively.

⁶⁰ CR/PR at II-1.

⁶¹ CR/PR at Table I-5.

⁶² CR/PR at Table C-1.

⁶³ CR/PR at Table C-1. The domestic industry’s market share was *** percent in 2004, *** percent in 2005, *** percent in 2006, *** in 2007, *** percent in 2008, and *** percent in 2009. Id.

⁶⁴ CR/PR at Table C-1. Subject imports’ market share was *** percent in 2004, *** percent in 2005, *** percent in 2006, *** percent in 2007, *** in 2008, and *** percent in 2009. Id.

year of the period examined after 2005.⁶⁵ By 2009, nonsubject imports accounted for only *** percent of apparent U.S. consumption.⁶⁶

c. Other Conditions

There is a high degree of substitutability between domestically produced ironing tables and the subject imports.⁶⁷ Responding wholesale purchasers listed price and quality as the most important factors affecting their ironing table purchasing decisions.⁶⁸

Raw material costs account for a substantial share of the cost of goods sold (“COGS”) for ironing tables.⁶⁹ The principal raw material input is cold-rolled steel sheet. Reported quarterly prices for cold-rolled sheet fluctuated over the period examined, increasing from January-March 2004 to July-September 2008, before decreasing through July-September 2009, and then increasing again in October-December 2009.⁷⁰

Based on the evidence in the record of this five-year review, we find that conditions of competition in the ironing table market are not likely to change significantly in the reasonably foreseeable future. Accordingly, we find that current conditions in the market provide us with a reasonable basis on which to assess the likely effects of revocation of the orders in the reasonably foreseeable future.

C. Likely Volume of Subject Imports

1. The Commission’s Original Determination

In the original investigation, the Commission found that the volume and market share of subject imports increased substantially throughout the period of investigation. The Commission found that the quantity of subject imports nearly quadrupled in terms of quantity and nearly tripled in terms of value between 2001 and 2003. Although subject imports declined in interim 2004, the Commission attributed the decline to the filing of the petition and the imposition of provisional duties in February 2004. The Commission also found that subject imports’ market share increased dramatically between 2001 and 2003, rising nearly *** percentage points in terms of quantity and value.⁷¹ The domestic industry’s share of apparent U.S. consumption fell from *** percent to *** percent in 2003 and the Commission found that this loss was entirely due to subject imports. Finally, moderate price declines did not significantly

⁶⁵ Nonsubject imports’ market share was *** percent in 2004, *** percent in 2005, *** percent in 2006, *** percent in 2007, *** percent in 2008, and *** percent in 2009. CR/PR at Table C-1.

⁶⁶ CR at IV-2, PR at IV-1 to IV-2. Responding U.S. importers identified the following nonsubject countries as sources of ironing tables imported into the U.S. market: Germany, India, Italy, Latvia, Spain, Taiwan, and The Netherlands. CR at II-14, PR at II-9. Some importers noted the presence of ironing tables from Taiwan in the U.S. market. Participating interested parties, however, were not able to identify any producers of metal-top ironing tables in Taiwan. *Id.* and HPI’s Answers to Questions from the Commission (Commissioner Pinkert) at A-39 to A-40.; Hearing Transcript at 141 (Scott).

⁶⁷ CR at II-29, PR at II-19. Responding market participants generally reported that domestic ironing tables and those imported from China and third countries were “always” or “frequently” interchangeable. CR/PR at Table II-4.

⁶⁸ CR at II-27 to II-28 and n.58, PR at II-18 and n.58; and CR/PR at Table II-3.

⁶⁹ Total raw material costs averaged almost *** percent of COGS during the period examined. CR/PR at V-1.

⁷⁰ CR at III-10, PR at III-5; and CR/PR at V-1 and Figure V-1. HPI’s quarterly purchase prices of cold-rolled steel sheet increased from \$*** per pound during January-March 2004 to *** per pound by July-September 2008, an increase of *** percent, before decreasing to *** per pound by July-September 2009 and ending at \$*** per pound during October-December 2009. U.S. Producer Questionnaire Response at section IV-24.

⁷¹ Original Investigation at 17-18.

increase purchases over the period examined due to the long-lasting nature of ironing tables as a durable good. Consequently, the Commission determined that the increased volumes of subject imports at less-than-fair value had taken market share from the remaining domestic producer, rather than resulting in increased domestic consumption.⁷²

The Commission found that both perforated-top and mesh-top ironing tables were purchased by large customers, and that HPI produced both types and had capacity to produce substantially higher volumes.⁷³ In addition, the Commission found that Whitney Design had sought and gained additional customers for its subject imports.⁷⁴ Nevertheless, the Commission found that a large portion of the increase in subject import volume during the period was not attributable to Whitney Design's shift from domestic producer to subject importer because Whitney Design accounted for *** of total imports and its total share of subject imports was much lower in 2003 than in 2001. Moreover, the Commission found that a large purchaser increased its imports of mesh-top ironing tables during the period.

Consequently, the Commission found both the volume and increase in volume of subject imports to be significant, both in absolute terms and relative to consumption and production in the United States.

2. The Current Review

Several factors support the conclusion that the subject import volume is likely to be significant in the event of revocation of the order.

Substantial volumes of subject imports have been present in the U.S. market over the period examined even with the order in place. Subject imports were *** units in 2004, *** units in 2005, *** units in 2006, *** units in 2007, *** units in 2008, and *** units in 2009.⁷⁵ Subject imports' market share was *** percent in 2004, *** percent in 2005, *** percent in 2006, *** percent in 2007, *** percent in 2008, and *** percent in 2009.⁷⁶

The record contains data only for part of the Chinese industry.⁷⁷ Thus, the record data on Chinese production, production capacity, and shipments are likely substantially understated. However, the Chinese producers responding to the Commission's questionnaires have considerable production capacity and unused capacity. Chinese producers' reported capacity was *** units in 2004, *** units in 2005, *** units in 2006, *** units in 2007, *** units in 2008, and *** units in 2009.⁷⁸ The reported production capacity in 2009 is *** apparent U.S. consumption for that year.⁷⁹ Chinese producers'

⁷² Original Investigation at 18.

⁷³ Original Investigation at 18-19.

⁷⁴ Original Investigation at 20.

⁷⁵ CR/PR at Table IV-1. U.S. shipments of subject imports were *** units in 2004, *** units in 2005, *** units in 2006, *** units in 2007, *** units in 2008, and *** units in 2009. CR/PR at Table C-1.

⁷⁶ CR/PR at Table C-1.

⁷⁷ As noted above, six of the 31 known Chinese producers of ironing tables responded to the Commission's foreign producer questionnaires. During the period, *** were the largest producers of ironing tables in China to provide data. Proprietary Customs data indicate that ***. CR at IV-5, PR at IV-3.

This is consistent with the companies' respective antidumping duty margins resulting from administrative reviews by Commerce during the review period. Since Hardware's original duty rate was 9.47 percent, and it received a de minimis rate in 2007. In an administrative review completed in 2007, Foshan Shunde received a rate of 2.37 percent (it had previously been 157.68 percent). Both companies exported significant volumes to the United States under these relatively low rates. However, in 2009 and 2010, Commerce determined that Since Hardware and Foshan Shunde, respectively, had submitted inaccurate and unreliable data, and imposed the China-wide rate of 157.68 percent on both companies. CR/PR at Table I-2, nn. 2 and 3.

⁷⁸ CR/PR at Table IV-3.

⁷⁹ CR/PR at Tables IV-3 and C-1.

reported capacity utilization fluctuated between 81.0 and 88.9 percent between 2004 to 2008, then fell to 70.7 percent in 2009.⁸⁰ The Chinese industry's reported capacity utilization rate, especially in 2009, indicates that available capacity exists in China to increase production of ironing tables if the antidumping duty order were revoked.⁸¹

The Chinese industry is highly export-oriented, with exports as a share of total shipments ranging between *** and *** percent between 2004 and 2009.⁸² The United States remained a significant market for Chinese exports over the period of review, accounting for between *** and *** percent of shipments. The European Union was the largest market, accounting for between *** and *** percent of shipments. The home market accounted for *** percent of shipments.⁸³

The United States is a very important market for Chinese producers. The Chinese industry continues to maintain a substantial presence in the U.S. market during the period of review despite the order, and Chinese producers have established business relationships with U.S. purchasers of ironing tables that would enable them to increase shipments to the United States substantially in the event of revocation of the order.⁸⁴ The Chinese industry now faces a significant barrier in its other main market, the EU.⁸⁵ In April 2007, the EU imposed definitive antidumping duties on imports of Chinese ironing tables at margins ranging from 18.1 percent to 38.1 percent.⁸⁶

Finally, end-of-period inventories of ironing tables held by producers in China increased steadily over the period examined and were markedly higher in 2009 than in 2004.⁸⁷

Based on the rapid increase of subject imports and their market share during the original investigation, the substantial volumes of subject imports present during the period examined despite the order, the substantial production capacity, excess capacity, and export-orientation of the Chinese industry, the importance of the U.S. market to Chinese producers, the EU antidumping order, and Chinese producers' inventories, we find that Chinese producers would have the ability and incentive to ship significant volumes of additional exports to the United States if the order were revoked. Therefore, we find that the likely volume of subject imports, both in absolute terms and relative to production and consumption in the United States, would be significant if the order were revoked.

⁸⁰ CR/PR at Table IV-3.

⁸¹ We note that Chinese producer *** reported purchasing new machinery related to the production of ironing tables during the period examined. CR at IV-6 n.12, PR at IV-4 n.12 and ***. In addition, two Chinese producers, ***, reported production of nonsubject merchandise on the same equipment used to produce subject ironing tables. CR at IV-6, PR at IV-4. Thus, there is a potential for these producers to shift production from nonsubject merchandise to ironing tables.

⁸² CR/PR at Table IV-3.

⁸³ CR/PR at Table IV-3.

⁸⁴ HPI Prehearing Brief at 34. See also CR at D-8 to D-9 and D-13, PR at D-3 and D-4 (***).

⁸⁵ The European Union is believed to be the largest non-U.S. market for ironing tables, with consumption of 8.6 million units in 2005. CR at IV-10 and n.20, PR at IV-6 and n.20.

⁸⁶ CR at IV-8 to IV-9, PR at IV-6. Although Since Hardware was originally given a zero percent duty, the EU initiated another antidumping proceeding on this producer in October 2009; this proceeding is ongoing. The EU announced in December 2009 that Foshan Shunde was no longer subject to antidumping duties due to a judgment by the Court of Justice of the European Communities. However, the EU has reopened the investigation with respect to Foshan Shunde. Id.

⁸⁷ Inventories held by Chinese producers were 136,000 units in 2004, 158,000 units in 2005, 173,000 units in 2006, 224,000 units in 2007, 215,000 units in 2008, and 359,000 units in 2009. CR/PR at Table IV-3. End-of-period inventories of subject imports held by U.S. importers increased from *** units in 2004 to *** units in 2007, then decreased to *** units in 2008 and *** units in 2009. CR/PR at Table IV-2.

D. Likely Price Effects of Subject Imports

1. The Commission's Original Determination

In the original investigation, the Commission found that the domestic like product and subject imports were interchangeable and that price was the most important factor in purchasing decisions. The Commission found there was a concentration of purchasers at the wholesale level, with approximately *** percent of the ironing tables sold to only three customers; these few large buyers could negotiate lower prices, and lower retail pricing by one may have resulted in widespread downward retail pricing that, in turn, may have resulted in downward pressure on wholesale prices.⁸⁸

The Commission found a wide range of prices between the opening price point and the various higher priced models, with mesh-top ironing tables historically more expensive than perforated-top ironing tables. The Commission collected pricing data on two products – perforated-top T-leg ironing tables and mesh-top T-leg ironing tables (the former was the predominant product of the domestic industry and was not produced by the Chinese industry, the latter was produced by both). The Commission found price comparisons between domestic and imported mesh-top tables to be more probative than comparisons between perforated-top domestic tables and subject imported mesh-top ironing tables.⁸⁹

Pricing data showed that prices for Chinese mesh-top T-leg ironing tables were generally higher than those for comparable domestic product through the first quarter of 2002. Thereafter, the Chinese tables were priced lower than domestic product as subject import volumes rose and subject import prices fell. The Commission found significant underselling for this product, particularly in light of the large increase in import volumes in 2003.⁹⁰

The Commission found that the evidence regarding internet reverse sales and lost sales and revenues indicated that subject imports of mesh-top tables were overtaking the market previously dominated by domestic perforated-top tables, and were doing so by underselling and driving prices lower.⁹¹ Given that more than 75 percent of domestic consumption reportedly was in the opening price point category and the majority of HPI's sales into this category were perforated-top ironing tables, the Commission found significant price depression based on the product specific data as well as other information in the record, including information in the internet reverse auctions and lost sales and revenues.⁹²

As a result, the Commission concluded that there had been significant price underselling by the subject imports and that the effect of such imports had been to depress prices for the domestic like product to a significant degree.⁹³

⁸⁸ Original Investigation at 21.

⁸⁹ Original Investigation at 21-22.

⁹⁰ Original Investigation at 23.

⁹¹ Original Investigation at 23.

⁹² Original Investigation at 25.

⁹³ Original Investigation at 26.

2. The Current Review

As stated above, more than *** percent of reported purchases of ironing tables at the wholesale level during the period of review were made by only five customers – *** – who purchase ironing tables with an intent to sell them at retail.⁹⁴

Chinese and domestic ironing tables are interchangeable and price is an important factor in purchasing decisions. There is a wide range of prices at the retail level between the opening price point (generally \$18 or less) and the various higher priced models (up to \$70 or more).⁹⁵ The Commission collected pricing data on six products with pad and cover, but without additional equipment⁹⁶— two perforated-top T-leg models with different leg thicknesses and weight (products 1 and 2), two mesh-top T-leg models with different leg thicknesses and weight (products 3 and 4), and two mesh-top four leg models with different leg thicknesses and weight (products 5 and 6).⁹⁷ Domestic product prices were reported for products 1, 3, and 5, and subject import prices were reported for products 3 through 6.

Quarterly prices of two of the three domestic products and of the four subject imported products fluctuated, but generally increased during the period. A total of 48 quarterly price comparisons, involving unbundled sales,⁹⁸ were possible for products 3 and 5. Subject imports undersold the domestic product in four of these comparisons with margins ranging from *** percent to *** percent. In forty-three other comparisons, subject imports oversold the domestic product.⁹⁹

We have taken several factors into consideration in evaluating these pricing data. First, these prices are for a period when the order was in effect, which would be expected to increase subject import prices. Second, U.S. importer *** included in its pricing data for product 3 (a lighter-weight mesh-top T-leg ironing table) sales data for a reportedly competitive *** model that, in certain configurations, included features characteristic of ironing tables sold in higher retail price point categories.¹⁰⁰ This product accounted for a significant share of reported importer sales of product 3. We believe that the higher prices of the imported *** product 3 may have caused the overall product 3 price data to be unrepresentative of actual price competition for this product during the period examined.¹⁰¹

Third, *** purchaser of ironing tables,¹⁰² is a direct importer of the subject merchandise. *** for product 3 and product 5 were lower than domestic selling prices for these products in *** of *** quarterly comparisons. *** are not directly comparable to domestic prices.¹⁰³ Nonetheless, in ***

⁹⁴ Calculated from CR/PR at Table II-2. *** collectively represent approximately *** percent of reported purchases of ironing tables at the wholesale level. *Id.*

⁹⁵ *** where price competition is most intense. Approximately *** percent of its sales are of ***, and approximately *** percent of its sales are of ***. U.S. Producer Questionnaire Response at section IV-5.

⁹⁶ The six ironing table products may include an iron rest or linen rack, but no equipment extraneous to the ironing table, such as an iron. CR at V-12 n.15, PR at V-7 n.15

⁹⁷ CR at V-12, PR at V-7 to V-8.

⁹⁸ Bundled sales of ironing tables occur when ironing tables and other products, such as irons and other laundry items, are sold as a group under a bundled (combined) price; prices of the different items may be specified, but are not independently determined. CR at V-5 n.10, PR at V-3 n.10.

⁹⁹ CR at V-30, PR at V-14 and CR/PR at Table V-8. There was one price comparison with equal prices.

¹⁰⁰ CR at V-30 n.31, PR at V-14 n.31; CR at I-15, PR at I-9.

¹⁰¹ *See, e.g.*, HPI Final Comments at 8.

¹⁰² CR/PR at Table II-2.

¹⁰³ *** initially indicated that its reported price data for the firm's direct imports of ironing tables from China were the requested import prices based on landed (c.i.f), duty-paid, U.S. ports-of-entry values. However, after further review, *** reported that the data were the foreign invoice values, f.o.b. the Chinese factory. CR at V-13 to V-14 and V-32, PR at V-8 to V-9 and V-15. These invoice prices in China are not directly comparable to domestic

instances, these foreign f.o.b. values were *** percent or more below domestic prices for comparable products.¹⁰⁴

Finally, sales by *** of imported price product 4 (a heavier-weight, mesh-top T-leg ironing table) were *** lower-priced than domestic sales of product 3, a lighter-weight, mesh-top T-leg ironing table.¹⁰⁵ Normally, a heavier-weight ironing table would be expected to be priced higher than a comparable lighter-weight ironing table, particularly where the primary raw material in the production of ironing tables, cold-rolled steel sheet, comprises a significant portion of the unit manufacturing cost. Given these considerations, we place only limited weight on the price comparison data for the period examined.

Based on the finding of significant underselling during the original investigation, the significant likely volumes of subject imports if the order were revoked, the nature of the product and the market, in particular the importance of price to the purchasing decisions, the high degree of price competition between the domestic like product and the subject imports, and the substantial influence over U.S. prices as well as the buying market power exercised by the few large wholesale customers, we find that the subject imports from China likely would significantly undersell the domestic like product to gain market share and likely would have significant depressing or suppressing effects on the prices of the domestic like product if the order were revoked.

E. Likely Impact of Subject Imports¹⁰⁶

1. The Commission's Original Determination

In the original investigation, the Commission found that the exit of Whitney Design from the industry in April 2002 significantly reduced domestic production capacity. Even accounting for this development, the Commission found that the data for HPI, the sole domestic producer after April 2002, indicated that production and capacity utilization decreased significantly between 2001 and 2003. Although the domestic industry's end-of-period inventories fluctuated over the period and remained steady when comparing 2003 with 2001, the Commission found that the ratio of inventories to production and U.S. shipments *** between 2001 and 2003.

prices because they do not include the costs to ship and land ironing tables in the U.S. market, including costs of freight, insurance, loading and off-loading, import duties, and customs clearance.

¹⁰⁴ CR at V-32 and n.36, PR at V-15 and n.36. Based on official statistics, charges, insurance, and freight costs for all U.S. imports of ironing tables from China averaged 18.8 percent of the Customs value from 2004 to 2009. *** reported that the difference between its costs f.o.b. China and its U.S. landed cost averaged *** percent over the same period. CR at V-14 and n.24, PR at V-9 and n.24.

¹⁰⁵ CR at V-32 n.34, PR at V-14 n.34.

¹⁰⁶ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission "considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports." SAA at 885, 19 U.S.C. § 1675a(a)(4). Section 752(a)(6) of the Tariff Act states that "the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy" in making its determination in a five-year review. 19 U.S.C. § 1675a(a)(6). The statute defines the "magnitude of the margin of dumping" to be used by the Commission in five-year reviews as "the dumping margin or margins determined by the administering authority under section 1675a(c)(3) of this title." 19 U.S.C. § 1677(35)(C)(iv). See also SAA at 887.

In the final results of its expedited sunset review of the antidumping duty order on ironing tables from China, Commerce found likely antidumping duty margins of 9.47 percent for Since Hardware; 72.29 percent for Forever Holdings, Ltd., Gaoming Lihe Daily Necessities Co., Ltd., and Harvest International Housewares, Ltd.; and 157.68 percent for Shunde Yongjian Housewares Co., Ltd., Foshan Shunde, and for the PRC-wide rate. 74 Fed. Reg. at 56795.

Overall, the Commission found that employment-related and financial indicators declined over the period as well.¹⁰⁷ Although the Commission found the domestic industry profitable in 2003 and the industry's operating income ratio remained *** during the period, it also noted that operating income ratio is only one of many factors the Commission examines in making its finding with respect to the impact of subject imports on the domestic industry. The Commission found that most of the industry's cost of goods sold was ***, and that the cost of HPI's plant and equipment was ***. Thus, because the ***. The Commission concluded that the *** of operating leverage reflected in the manufacturing cost structure of ironing tables helped to explain how the industry was able to maintain operating margins despite experiencing declines in sales and production volume.¹⁰⁸ As a result, the Commission found that the injury to the domestic industry manifested itself primarily in the large declines in many of the industry indicators other than operating margins.¹⁰⁹

2. The Current Review

The domestic industry's performance was inconsistent from 2004 to 2008 before improving substantially in 2009. Production increased steadily from *** units in 2004 to *** units in 2007, then fell to *** units in 2008 and *** units in 2009.¹¹⁰ Production capacity remained constant from 2004 to 2009 at *** units. Capacity utilization increased steadily from *** percent in 2004 to *** percent in 2007, then fell to *** percent in 2008 and *** percent in 2009.¹¹¹ U.S. shipments increased from *** units in 2004 to *** units in 2007, then fell to *** units in 2008 and 2009. Net sales increased from *** units in 2004 to *** units in 2007, then fell to *** units in 2008 and 2009.¹¹² End-of-period inventories peaked in 2006, then fell to 2004 levels by the end of the period; the ratio of inventories to production followed a similar pattern.¹¹³ The number of production and related workers (PRWs) fluctuated from *** in 2004 to *** in 2007, then fell to *** in 2008 and *** in 2009. The number of hours worked fluctuated from *** in 2004 to *** in 2007, then fell to *** in 2008 and increased to *** in 2009.¹¹⁴

The domestic industry's financial performance fluctuated greatly from 2004 to 2007, with a marked decrease in 2008 that reflects significant increases in raw material costs, particularly cold-rolled steel sheet.¹¹⁵ The industry's financial performance improved in 2009, despite no significant increase in net sales, due to a decrease in its steel costs.¹¹⁶ The industry's operating income was \$*** in 2004, \$***

¹⁰⁷ Original Investigation at 28-29.

¹⁰⁸ Original Investigation at 29.

¹⁰⁹ Original Investigation at 30.

¹¹⁰ CR/PR at Table C-1.

¹¹¹ CR/PR at Table C-1.

¹¹² CR/PR at Table C-1.

¹¹³ CR/PR at Table III-4.

¹¹⁴ CR/PR at Table C-1. Productivity (units/hour) was *** in 2004, *** in 2005, *** in 2006, *** in 2007, *** in 2008, and *** in 2009. Id.

¹¹⁵ From 2007 to 2008, the domestic industry's unit cost of goods sold ***. CR/PR at Table C-1.

¹¹⁶ Most of the domestic industry's cost of goods sold is ***. Thus, the average unit manufacturing costs of ironing tables increased dramatically as the price of the principal raw material for ironing tables, cold-rolled steel sheet, increased significantly in 2008. CR/PR at Figure V-1. The easing of steel prices in 2009 led to a reduction in the average unit manufacturing costs and a return to profitability for the domestic industry despite a slight decrease in net sales from the prior year. CR/PR at Table C-1.

The ratio of COGS to net sales was *** percent in 2004, *** percent in 2005, *** percent in 2006, *** percent in 2007, *** percent in 2008, and *** percent in 2009. CR/PR at Table C-1.

in 2005, \$*** in 2006, \$*** in 2007, *** in 2008, and \$*** in 2009.¹¹⁷ The industry's operating income margin was *** percent in 2004, *** percent in 2005, *** percent in 2006, *** percent in 2007, *** percent in 2008, and *** percent in 2009. Based on these mixed data, we do not find that the domestic industry is in a vulnerable state.

Based on the record in this review, we conclude that revocation of the order would likely lead to a significant increase in subject imports that likely would undersell the domestic like product and significantly suppress or depress U.S. prices. The vast majority of ironing tables sold in the U.S. market by the domestic industry are to a limited number of large retailers at the wholesale level.¹¹⁸ The loss of one of these large purchasers to subject imports would have a substantial impact on the domestic industry's condition.¹¹⁹

We have also considered the role of other factors, including nonsubject imports and demand, that might have an effect on the domestic industry in the reasonably foreseeable future. Nonsubject imports have had only a minimal share of the market, ranging from a high of *** percent in 2005 to a low of *** percent in 2009. The share fell every year since 2005.¹²⁰ Thus, nonsubject imports, given the small volumes, are not likely to prevent a substantial increase in the volume of subject imports after revocation.¹²¹ With the current recession and the durable nature of product, future demand for ironing tables is expected to decrease or remain flat at best. However, we find that this makes the industry more susceptible to injury by the likely volume and price of subject imports. Although the domestic industry's financial performance improved greatly in 2009, this was largely due to the decrease in raw material costs, particularly cold-rolled steel sheet, and the imposition of substantial antidumping duty deposits for Since Hardware in March 2009.¹²² Such favorable cost conditions are not likely to recur in the reasonably foreseeable future.¹²³ Finally, Respondents allege that plastic-top ironing tables produced in both China and the United States are now replacing metal-top ironing tables in the U.S. market.¹²⁴ Plastic-top ironing tables, however, are high priced and represent an extremely small share of the U.S. market, reportedly less than one percent.¹²⁵ In addition, market interest in the plastic-top ironing table reportedly was driven,

¹¹⁷ The industry's capital expenditures were \$*** in 2004, \$*** in 2005, \$*** in 2006, \$*** in 2007, \$*** in 2008, and \$*** in 2009. CR/PR at Table C-1.

¹¹⁸ Sales to *** accounted for *** percent of HPI's U.S. shipments of ironing tables over the period examined, while *** accounted for *** percent and *** for *** percent. Calculated from CR/PR at Tables I-7 and II-2.

¹¹⁹ See CR at D-4 to D-5, PR at D-3 (HPI's Answer to Question II-4 - Impact of Revocation).

¹²⁰ CR/PR at Table C-1.

¹²¹ The Respondents allege that India is an emerging source of ironing tables and that there will be little impact on the U.S. industry if the antidumping order is lifted because those nonsubject imports are replacing the Chinese subject imports. Respondent Prehearing Brief at 15-16 and Posthearing Brief, Answers to Questions from the Commission (Chairman Aranoff) at 11-12 and Appendix PH-4. However, the record does not indicate that India was a substantial source of ironing tables over the period examined, nor does it show any increase in imports of ironing tables from India in the most recent years of the period examined. CR/PR at Table C-2.

¹²² As discussed earlier, Commerce determined in 2009 that Since Hardware was no longer eligible for separate rate status and subsequently included Since Hardware in the PRC-wide Entity with an antidumping duty cash deposit rate of 157.68 percent. 74 Fed. Reg. 11085 (March 16, 2009).

¹²³ Prices for cold-rolled steel sheet reportedly have increased 40 percent in March 2010 compared to March 2009. HPI's Answers to Questions from the Commission (Chairman Aranoff and Commissioners Okun, Pinkert, and Williamson) at A-15.

¹²⁴ Respondent Prehearing Brief at 16 and Posthearing Brief, Answers to Questions from the Commission (Chairman Aranoff) at 10, 13-14 and Appendix PH-4.

¹²⁵ HPI Posthearing Brief at 2-3 and Answer to Questions from the Commission (Chairman Aranoff) at A-43 to A-44; Hearing Transcript at 130 (Cooper).

at least in part, by the antidumping duty order on metal-top ironing tables from China.¹²⁶ Therefore, considerations of factors other than the subject imports do not detract from our finding that the subject imports will have a likely material adverse impact on the domestic industry.

Consequently, based on the record of this review, we find that the likely volume and price effects of the subject imports would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry. Declines in these indicators of industry performance would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and to make and maintain capital investments. Therefore, we conclude that, if the antidumping duty order were revoked, subject imports from China would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

CONCLUSION

For the above reasons, we determine that revocation of the antidumping duty order on ironing tables and parts thereof from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

¹²⁶ HPI Posthearing Brief at 2-3 and Answer to Questions from the Commission (Chairman Aranoff) at A-43 to A-44; Hearing Transcript at 130 (Cooper).

PART I: INTRODUCTION AND OVERVIEW

BACKGROUND

Effective July 1, 2009, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted a review to determine whether revocation of the antidumping duty order on ironing tables and certain parts thereof (“ironing tables”) from China would likely lead to the continuation or recurrence of material injury to a domestic industry.^{2 3} Effective October 5, 2009, the Commission determined that it would conduct a full review pursuant to section 751(c)(5) of the Act.⁴ Information relating to the background and schedule of this proceeding appears in the following tabulation:⁵

Effective date	Action
August 6, 2004	Commerce's antidumping duty order on ironing tables from China (69 FR 47868)
July 1, 2009	Commission's institution of five-year review (74 FR 31755, July 2, 2009)
July 1, 2009	Commerce's initiation of five-year review (74 FR 31412)
October 5, 2009	Commission's determination to conduct a full five-year review (74 FR 54066, October 21, 2009)
November 3, 2009	Commerce's final results of expedited five-year review of the antidumping duty order on ironing tables from China (74 FR 56794)
November 16, 2009	Commission's scheduling of the review (74 FR 62593, November 30, 2009)
April 13, 2010	Commission's hearing
May 21, 2010	Commission's vote
June 8, 2010	Commission's determinations transmitted to Commerce

¹ 19 U.S.C. 1675(c).

² *Ironing Tables from China*, 74 FR 31755, July 2, 2009. All interested parties were requested to respond to this notice by submitting the information requested by the Commission. The Commission received comments from Groupe SEB USA, Inc., Home Products International, Inc., Polder Inc., Since Hardware Co., and Whitney Design.

³ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year review of the subject antidumping duty order. *Initiation of Five-year (“Sunset”) Review*, 74 FR 31412, July 1, 2009.

⁴ *Ironing Tables from China*, 74 FR 54066, October 21, 2009. The Commission found that both the domestic and respondent interested party group responses to its notice of institution were adequate.

⁵ The Commission's notice of institution, notice to conduct full review, scheduling notice, and statement on adequacy appear in appendix A and may also be found at the Commission's web site (internet address www.usitc.gov). Commissioners' votes on whether to conduct an expedited or full review may also be found at the web site. Appendix B presents the witnesses appearing at the Commission's hearing.

THE ORIGINAL INVESTIGATION

The original investigation resulted from a petition filed by Home Products International, Inc. (“HPI”), Chicago, IL, on June 30, 2003. Following notification of a final determination by Commerce that imports of ironing tables from China were being sold at LTFV, the Commission determined on July 29, 2004, that a domestic industry was materially injured by reason of LTFV imports of ironing tables from China.⁶ Commerce published the antidumping duty order on ironing tables from China on August 6, 2004.⁷

The Commission had conducted no previous investigations concerning ironing tables prior to HPI’s petition. The agency has conducted no related investigations concerning ironing tables since the completion of its original investigation.

SUMMARY DATA

Table I-1 presents a summary of data from the original investigation and the current full five-year review.⁸ The domestic industry producing ironing tables consists of one company, Home Products International, Inc. (“HPI”). The largest known manufacturers of ironing tables in China are ***. The largest U.S. importers are ***. Floor-standing, metal-top ironing tables are sold by the domestic producers and importers to mass retail stores such as ***, as well as to the hospitality/hotel market.⁹

Table I-1
Ironing tables: Comparative data from the original investigation and current review, 2001-03 and 2004-09

* * * * *

Note.— Data regarding U.S. shipments of imports from all sources during 2001-03 are public, and can be found in *Ironing Tables and Certain Parts Thereof from China*, Inv. No. 731-TA-1047 (Final), USITC Publication 3711, July 2004, tables IV-1 and C-1. Data regarding U.S. shipments of imports from all sources during 2004-09 are similarly public, and can be found in this report in table C-1.

⁶ *Ironing Tables and Certain Parts Thereof from China*, Inv. No. 731-TA-1047 (Final), USITC Publication 3711, July 2004.

⁷ *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof From the People’s Republic of China*, 69 FR 47868, August 6, 2004.

⁸ Domestic industry data include Whitney Design until 2002, when the company ceased domestic production. U.S. import data in the original investigation were drawn from questionnaire responses because until July 1, 2003, there was no statistical reporting number dedicated to ironing tables. Since July 1, 2003, a statistical reporting number dedicated to floor-standing, metal-top ironing tables has been in effect. However, misclassification has resulted in the overstatement of imports of ironing tables, even under the dedicated statistical reporting number. Accordingly, the import data presented in table I-1 and throughout the report are compiled from questionnaire responses. A summary for U.S. imports based on official Commerce statistics is located at C-2 in appendix C. Staff notes that the Commission has received questionnaires from all major known importers of ironing tables, which are largely the same importers that responded in the final phase of the investigation.

⁹ There is no known domestic production or imports of major parts or components of ironing tables, as defined by Commerce’s scope, separate from the production and sale of finished ironing tables.

STATUTORY CRITERIA AND ORGANIZATION OF THE REPORT

Statutory Criteria

Section 751(c) of the Act requires Commerce and the Commission to conduct a review no later than five years after the issuance of an antidumping or countervailing duty order or the suspension of an investigation to determine whether revocation of the order or termination of the suspended investigation “would be likely to lead to continuation or recurrence of dumping or a countervailable subsidy (as the case may be) and of material injury.”

Section 752(a) of the Act provides that in making its determination of likelihood of continuation or recurrence of material injury--

(1) IN GENERAL.-- . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted,

(B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . . , (Commerce’s findings) regarding duty absorption . . .

(2) VOLUME.--In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including--

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.

(3) PRICE.--In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

*(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and
(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.*

(4) IMPACT ON THE INDUSTRY.--In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to--

*(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,
(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and
(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.*

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(6) of the Act states further that in making its determination, “the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement.”

Organization of the Report

Information obtained during the course of the review that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for ironing tables as collected in the review is presented in appendix C. U.S. industry data are based on the questionnaire response of one U.S. producer of ironing tables that is believed to have accounted for all domestic production of ironing tables in 2009. U.S. import data and related information are based on the questionnaire responses of 10 U.S. importers of ironing tables. These data are based on responses from the largest known U.S. importers and foreign producers exporting to the U.S. and are believed to cover the large majority of imports from China as well as from nonsubject sources. Foreign industry data and related information are based on questionnaire responses from six Chinese manufacturers/exporters of ironing tables, including those most active in the U.S. market, as well as limited published information. Responses by the U.S. producer, importers, purchasers, and foreign producers of ironing tables to a series of questions concerning the significance of the existing antidumping duty order and the likely effects of revocation of the order are presented in appendix D. Appendix E presents an additional compilation of price data collected in this review.

COMMERCE'S REVIEWS

Administrative Reviews¹⁰

Commerce has completed four administrative reviews of the outstanding antidumping duty order on ironing tables from China.¹¹ The results of the administrative reviews are shown in table I-2.

Table I-2
Ironing tables: Administrative reviews of the antidumping duty order for China

Date results published	Period of review	Producer or exporter	Margin (percent)
March 21, 2007 (72FR 13239) as corrected on April 19, 2007 (72 FR 19689)	2/3/04 - 7/31/05	Since Hardware (Guangzhou) Co., Ltd.	0.45 (<i>de minimis</i>)
		Foshan Shunde Yongjian Houseware & Hardware Co., Ltd. ¹	2.37
		Forever Holdings Ltd.	10.18
March 18, 2008 (73 FR 14437)	8/1/05 - 7/31/06	Since Hardware (Guangzhou) Co., Ltd.	0.34 (<i>de minimis</i>)
March 16, 2009 (74 FR 11085)	8/1/06 - 7/31/07	Forever Holdings Ltd.	0.00
		PRC-wide Entity (which includes Since Hardware ²)	157.68
January 20, 2010 (75 FR 3201)	8/1/07 - 7/31/08	PRC-wide Entity (which includes Foshan Shunde ³)	157.68

¹ There has been confusion surrounding Foshan Shunde Yongjian Houseware & Hardware Co., Ltd. and Shunde Yongjian Housewares Co., Ltd. in the original antidumping duty order for ironing tables and subsequent administrative reviews. On August 31, 2005, Shunde Yongjian sent a letter to Commerce stating that it wanted to clarify that its request for an administrative review should also include a variation of the name that may have been used to export subject merchandise during the period of review. Shunde Yongjian stated that the name variation is as follows: Foshan Shunde Yongjian Housewares and Hardware Co., Ltd. However, in Commerce's final results of the administrative review of the time period February 3, 2004 - July 31, 2005, published March 21, 2007, Commerce states that, "based on our analysis of information and comments received from interested parties on this issue, as discussed in depth in the accompanying Issues and Decision Memorandum at Comment 8, the Department has determined that Foshan Shunde and Shunde Yongjian should not be collapsed and that Foshan Shunde is not the successor-in-interest to Shunde Yongjian. Therefore, the Department is rescinding this administrative review with respect to Shunde Yongjian, but will continue to calculate a separate rate for Foshan Shunde."

² Commerce determined that because Since Hardware had provided inaccurate and unreliable data, it was no longer eligible for separate rate status, and thus was properly considered to be part of the PRC-wide entity.

³ Commerce found that Foshan Shunde provided inaccurate and unreliable data, and as such, Commerce was unable to determine Foshan Shunde's eligibility for separate rate status. Thus, Commerce determined Foshan Shunde was properly considered to be part of the PRC-wide entity.

Note.— ***.

Source: Cited *Federal Register* notices and HPI's posthearing brief, exhibit 2.

¹⁰ No duty absorption findings were made.

¹¹ For previously reviewed or investigated companies not included in an administrative review, the cash deposit rate continues to be the company-specific rate published for the most recent period.

Five-Year Review

Commerce has issued the final results of its expedited review. Table I-3 presents the dumping margins calculated by Commerce in its original investigations and first review.

Table I-3
Ironing tables: Commerce's original and first five-year review dumping margins for producers/exporters¹

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Since Hardware (Guangzhou) Co., Ltd.	9.47	9.47
Shunde Yongjian Housewares Co., Ltd.	157.68	157.68
Forever Holdings Ltd.	72.29	72.29
Gaoming Lihe Daily Necessities Co., Ltd.	72.29	72.29
Harvest International Housewares Ltd.	72.29	72.29
Foshan Shunde	(²)	157.68
All others	157.68	157.68
¹ Antidumping duty order, 69 FR 47868, August 6, 2004; final results of Commerce's review, 74 FR 56794, November 3, 2009. ² Foshan Shunde was not listed separately in the original antidumping duty order. Source: Cited <i>Federal Register</i> notices.		

DISTRIBUTION OF CONTINUED DUMPING AND SUBSIDY OFFSET ACT FUNDS

The Continued Dumping and Subsidy Offset Act of 2000 ("CDSOA") (also known as the Byrd Amendment) provides that assessed duties received pursuant to antidumping or countervailing duty orders must be distributed to affected domestic producers for certain qualifying expenditures that these producers incur after the issuance of such orders.¹² During the review period, qualified U.S. producers of ironing tables were eligible to receive disbursements from the U.S. Customs and Border Protection ("Customs") under CDSOA relating to the order covering the subject merchandise beginning in Federal fiscal year 2006.¹³ Table I-4 presents CDSOA disbursements and claims for Federal fiscal years 2005 - 2009.¹⁴

¹² Section 754 of the Tariff Act of 1930, as amended (19 U.S.C. § 1675(c)). The Deficit Reduction Act of 2005 repealed the CDSOA with respect to duties on entries of goods made and filed on or after October 1, 2007. *See* Pub. L. No. 109-171, 120 Stat. 4, 154 (2006).

¹³ 19 CFR 159.64 (g).

¹⁴ The Federal fiscal year begins on October 1 and ends on September 30 of the next calendar year.

Table I-4

Ironing tables: CDSOA disbursements to HPI and total claims, Federal fiscal years 2005-09

Item	Federal fiscal year				
	2005	2006	2007	2008	2009
Disbursements (dollars)					
HPI	---	4,894.85	28,705.70	53,483.05	725,802.80
Claims (dollars)					
HPI	---	38,190,000	56,857,120	75,608,400	75,554,920
Source: U.S. Customs and Border Protection's CDSOA <i>Annual Reports</i> . Retrieved from www.cbp.gov/xp/cgov/import/add_cvd .					

THE SUBJECT MERCHANDISE

Commerce's Scope

The imported product subject to the antidumping duty order under review, as defined by Commerce in its original order, is as follows.¹⁵

(F)loor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with various features, including iron rests, linen racks, and others. The subject ironing tables may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this order.

Furthermore, the order specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. For purposes of this order, the term "unassembled" ironing table means a product requiring the attachment of the leg assembly to the top or the attachment of an included feature such as an iron rest or linen rack. The term "complete" ironing table means a product sold as a ready-to-use ensemble consisting of the metal-top table and a pad and cover, with or without additional features, e.g., iron rest or linen rack. The term "incomplete" ironing table means product shipped or sold as a "bare board" i.e., a metal-top table only, without the pad and cover, with or without additional features, e.g. iron rest or linen rack. The major parts or components of ironing tables that are intended to be covered by the order under the term "certain parts thereof" consist of the metal top component (with or without assembled supports and slides) and/or the leg components, whether or not attached together as a leg assembly.

¹⁵ *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Floor-Standing, Metal Top Ironing Tables and Certain Parts Thereof From the People's Republic of China*, 69 FR 47868, August 6, 2004.

This order covers separately shipped metal top components and leg components, without regard to whether the respective quantities would yield an exact quantity of assembled ironing tables. Ironing tables without legs (such as models that mount on walls or over doors) are not floor-standing and are specifically excluded. Additionally, tabletop or countertop models with short legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded.

Tariff Treatment

The subject ironing tables were previously covered by Harmonized Tariff Schedule of the United States (HTS) statistical reporting number 9403.20.0010. Effective July 1, 2003, the subject ironing tables have been properly entered as imports under HTS statistical reporting number 9403.20.0011. The subject metal top and leg components are imported under HTS statistical reporting number 9403.90.8040. Products of China entering the United States under HTS subheadings 9403.20.00 and 9403.90.80 are free of duty.

THE DOMESTIC LIKE PRODUCT

Description and Applications¹⁶

In this report, the term “ironing tables” is used to distinguish the subject floor-standing metal-top product from “ironing boards,” a term used to describe products excluded from the scope: countertop, tabletop, over-the-door, and wall-mounted ironing boards. Ironing tables are used in households, hotel rooms, and workplaces for the purpose of pressing apparel and other textile items. The standard size of an ironing table is 48 to 54 inches in length and 13 to 18 inches in width. The table may be equipped with special features such as an iron rest or linen racks.

Ironing tables and their components are produced from flat-rolled steel and wire, as well as fasteners, plastic fittings, foam, and textile fabric. The principal components of an ironing table are its metal ironing surface, legs, feet, slide bar, handle, hangers, ribs, and foot cover.

The ironing surface of ironing tables is either mesh-top or perforated-top and is attached to either a T-leg or a 4-leg stand. The 4-leg stand is considered superior to the T-leg because some perceive it to offer more stability. Typically, T-leg ironing tables are offered at opening price points of \$18 or less, while only the 4-leg is offered on higher-end models. A T-leg is made of a single metal tube inserted into a metal leg base that is shaped as an inverted “T.” A 4-leg ironing table has two legs, each made of two metal tubes that run parallel to each other, flare out to form a 4-footed base on the floor, and typically have a cross brace at or near the flare or at the end of the tubes. In each system, users press a lever that allows the legs to drop down and subsequently raise the height of the table or fold flat for storage.

¹⁶ Unless noted, the information in this section is based on the staff report in *Ironing Tables and Certain Parts Thereof from China, Inv. No. 731-TA-1047 (Final)*. Confidential data is drawn from INV-BB-087 (July 2, 2004) while public information is drawn from USITC Publication 3711, July 2004.

Ironing tables reportedly are sold in as many as five different retail price point categories. The following tabulation describes ironing tables at various price points:¹⁷

1) Value / open price point (OPP) (T-leg) Perforated or mesh-top with T-leg	\$18 or less
2) Good (4-Leg) Mostly mesh-top 4-leg and optionally an iron rest	\$18-\$28
3) Better (Heavy Duty) Mesh-top with heavy duty 4-leg and an added feature such as an iron rest	\$28-\$40
4) Best (Wide Top) Mesh wide top with heavy duty/Professional 4-leg and multiple added features such as an iron rest and linen rack.	\$40-\$70
5) Specialty Typically wide tops with extension cord, wheels and/or other combinations of accessories and special finishes	\$70 +

More than three-quarters of ironing tables consumed in the United States reportedly are in the open price point category.

U.S. imports of ironing tables from China are exclusively mesh-top, while the majority of domestic ironing tables are perforated.¹⁸ HPI has the capability of producing a mesh-top or perforated-top table, but produces more perforated-top tables as ***.¹⁹ Chinese manufacturers, in contrast, reportedly produce only mesh-top tables through a labor-intensive production process. None of the companies responding to the Commission's questionnaires reported producing, exporting, or importing perforated-top tables from China. ***.²⁰

Manufacturing Processes²¹

Ironing tables are produced in several countries, most notably in China, Italy, Poland, the United Kingdom, Turkey, India, and the United States, primarily from flat-rolled steel and wire. The production of ironing tables involves common capital equipment such as a metal roll-former, punch press, welding equipment, and painting facilities. The metal top may be formed by various processes, including pressing, stamping, and punching. Alternatively, much of the production may be accomplished by hand, with tools such as hand benders and welders, wire cutters, metal shears, and a sewing machine for covers. The production process in the United States purportedly is more capital-intensive than the production process in China.²²

¹⁷ E-mail from ***, December 22, 2009.

¹⁸ ***. See also Part V, tables V-1 through V-6, presenting the relative sales volumes of mesh-top and perforated-top ironing tables.

¹⁹ ***.

²⁰ ***. Several U.S. importers, purchasers, and Chinese producers rate performance differences as an important purchase consideration. See Part V for a discussion of perforated- vs. mesh-top ironing tables.

²¹ Unless noted, the information in this section is based on the staff report in *Ironing Tables and Certain Parts Thereof from China, Inv. No. 731-TA-1047 (Final)*. Confidential information is drawn from INV-BB-087 (July 2, 2004) while public information is drawn from USITC Publication 3711, July 2004.

²² ***.

HPI manufactures ironing tables in two plants in Seymour, IN. ***.²³

Perforated-top, T-leg models are the opening price point ironing tables for HPI and account for about *** percent of HPI's shipments, in terms of units shipped. ***.²⁴

According to HPI, flat-rolled steel is first formed into various parts. In a perforated-top, flat rolled steel is pressed in a series of sequential dies to form the top. However, for a mesh-top, steel is processed through a metal expanding machine and then is cut into the top shape by a die. The shaped steel mesh is inserted into a groove in the inner surface of the rim. The rim is then crimped tightly over the mesh in an automated process.^{25 26}

Following fabrication of the metal top, a set of tracks (hangers) is welded to the underside of the metal ironing surface. These hangers run the full length of the table. The hangers are stamped on a punch press. Vertical supports (ribs), produced on a roll former, are attached to the hangers. Legs and feet are made from steel tubes which are manufactured on site in an automated tube mill. The steel tubing is bent in an automated leg bending machine. The tops and legs are painted in either a wet or powder process. Various metal components are joined by a combination of welding²⁷ and riveting. The legs are connected to the hangers by a stamped piece of metal known as a hinge bar and are connected to the ribs with a slide bar. A height-adjusting handle, made on a wire machine, is also added to the ironing table. The foam pad and fabric cover are attached to the ironing table before the table is shrink-wrapped and packed in a carton.²⁸

Elastic is sewn into the outer edge of the textile fabric on site for ironing tables destined for the household market. The elastic holds the cover over the foam pad and metal table top. Fabric covers for ironing tables destined for the hospitality market are permanently affixed to the foam pads and table tops.²⁹

All of the components for the metal tops and legs are manufactured by HPI in Seymour, with the exception of plastic tips for the legs, which are purchased from domestic producers.³⁰ Accessories consist of foam pads and fabric covers for the tops and additional features, such as iron rests and linen racks. ***.³¹

Plastic-top ironing tables, which are not within the scope of this review, have emerged as a potential alternative to metal-top ironing tables in the U.S. market. See the section "Substitute Products" for a brief discussion regarding the substitutability of plastic-top ironing tables for metal-top ironing tables. Plastic-top ironing tables are not produced in the United States. HPI's plastic-top ironing tables for its "Revolution 360" line of upper-end ironing tables are produced in China and Korea.³²

²³ ***.

²⁴ ***.

²⁵ ***.

²⁶ None of the ironing table producers in China offer a perforated top. All ironing tables imported from China have mesh tops, which are more labor-intensive to manufacture. In China, the shaped mesh is welded on top of the ironing table rim instead of being attached through a crimping process. Ibid.

²⁷ The U.S. manufacturer uses resistance welding, in contrast to MIG and spot welding used to produce ironing tables in China. ***.

²⁸ ***.

²⁹ ***.

³⁰ ***.

³¹ ***.

³² Hearing transcript, p. 102 (Volles).

DOMESTIC LIKE PRODUCT ISSUES

In its original determination, the Commission defined the domestic like product as a single product consisting of floor-standing, metal-top ironing tables, coextensive within the scope of the investigation.³³ In its notice of institution in the current five-year review, the Commission solicited comments from interested parties regarding the appropriate domestic like product and domestic industry.³⁴ Domestic producer HPI indicated in its response to the Commission's notice of institution in this first review that it agrees with the Commission's definitions of domestic like product and domestic industry. Respondent interested parties Polder, Since, and Whitney indicated in their responses that they do not contest the domestic like product finding of the Commission. Groupe SEB did not indicate its position on the definitions of the domestic like product and domestic industry in its response to the Commission's notice of institution. No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires.³⁵ The domestic interested party's prehearing brief observed that, "in the first five-year review of the original determination, no facts have arisen that would suggest the Commission should revisit its original like product finding, nor has any party suggested that the Commission should do so,"³⁶ while its posthearing brief did not address the issue of like product further. The respondent interested parties did not address the issue of domestic like product in their briefs.

U.S. MARKET PARTICIPANTS

U.S. Producer

During the original investigation, two firms supplied the Commission with information on their U.S. operations with respect to ironing tables. These firms accounted for all U.S. production of ironing tables during the period January 2001 - March 2004.³⁷ In these current proceedings, the Commission issued producers' questionnaires to these two firms, one of which, HPI, provided the Commission with information on its ironing tables operations. The other, Whitney, is no longer a producer of ironing tables. Whitney ceased ironing table operations in April 2002 during the original investigation and has not produced ironing tables during the period for which data were collected. HPI is believed to account for all U.S. production of ironing tables in 2009. Presented in table I-5 is the current domestic producer of ironing tables, HPI, and its position on continuation of the order, production location, related and/or affiliated firms, and share of reported production of ironing tables in 2009.

³³ *Ironing Tables and Certain Parts Thereof from China, Inv. No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, pp. 4-8.

³⁴ *Ironing Tables from China*, 74 FR 31755, July 2, 2009.

³⁵ *Response to Commission's Notice of Institution of Domestic Interested Parties, Ironing Tables and Certain Parts Thereof* (Inv. No. 731-TA-1047 (Review)), July 31, 2009, p. 39; *Response to Commission's Notice of Institution of Since Hardware Co., Ironing Tables and Certain Parts Thereof* (Inv. No. 731-TA-1047 (Review)), July 31, 2009, p. 9; *Response to Commission's Notice of Institution of Whitney Design, Ironing Tables and Certain Parts Thereof* (Inv. No. 731-TA-1047 (Review)), July 31, 2009, p. 9; *Response to Commission's Notice of Institution of Polder Inc., Ironing Tables and Certain Parts Thereof* (Inv. No. 731-TA-1047 (Review)), July 31, 2009, p. 8; and *Response to Commission's Notice of Institution of Groupe SEB USA Inc., Ironing Tables and Certain Parts Thereof* (Inv. No. 731-TA-1047 (Review)), July 31, 2009.

³⁶ HPI's prehearing brief, p. 9.

³⁷ The two U.S. producers that supplied the Commission with usable questionnaire information during the original investigation were HPI and Whitney Design Inc. ("Whitney").

Table I-5
Ironing tables: HPI's position on the order, plant location, related and/or affiliated firms, and shares of 2009 reported U.S. production

Firm	Position on continuation of the order	U.S. production location	Related and/or affiliated firms	Share of production (percent)
HPI	Support	Seymour, IN	None	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

As indicated in the table above, the only U.S. producer, HPI, is not related to any foreign producers of the subject merchandise and is not related to any U.S. importers of the subject merchandise. As discussed in greater detail in Part III, HPI ***. HPI has not purchased the subject merchandise from U.S. importers during the period for which data were collected. HPI has *** with ***. Although ***, HPI has ***.³⁸

U.S. Importers

In the original investigation, 11 U.S. importing firms supplied the Commission with usable information on their operations involving the importation of ironing tables, accounting for an estimated 90.0 percent of U.S. imports of ironing tables during 2003. Both U.S. producers of ironing tables during the original investigation reported importing the product.

In the current proceeding, the Commission issued importers' questionnaires to 33 firms believed to be importers of subject ironing tables, as well as to all U.S. producers of ironing tables. Usable questionnaire responses were received from 10 companies. Seven of the 11 importers from the original investigation provided the Commission with usable questionnaire responses in the review and one company responded that it has not imported ironing tables during the period for which data were collected.³⁹ The seven responding importers were companies that accounted for *** of reported imports in 2003. Table I-6 lists all responding U.S. importers of ironing tables from China and other sources, their locations, and their shares of U.S. imports in 2009.

³⁸ HPI's posthearing brief, exh. 2, p. 4.

³⁹ Questionnaire responses were not received from IHW, Inc., Galactic Inc., and Ironees from the original investigation. These companies accounted for *** percent of the imports in 2003. IHW ***. Numerous attempts were made to contact Galactic and Ironees to no avail. The numbers listed in the original investigation had been disconnected, and there were no websites associated with these companies.

Table I-6
Ironing tables: U.S. importers, source(s) of imports, U.S. headquarters, and shares of imports in 2009

Firm	Headquarters	Source of imports	Share of imports (<i>percent</i>)		
			China	Other	Total
American Hotel Register Co.	Vernon Hills, IL	***	***	***	***
Bajer Design and Marketing, Inc.	Waukesha, WI	***	***	***	***
Brabantia USA Inc.	Woodcliff Lake, NJ	***	***	***	***
Groupe SEB USA Inc.	West Orange, NJ	***	***	***	***
Home Products International, Inc.	Chicago, IL	***	***	***	***
Ikea Inc.	Westampton, NJ	***	***	***	***
Polder Inc.	Oxford, CT	***	***	***	***
Target Inc.	Minneapolis, MN	***	***	***	***
Whitmor Manufacturing Company	Southaven, MS	***	***	***	***
Whitney Design, Inc. ¹	Hazelwood, MO	***	***	***	***
Total			100.0	100.0	100.0

¹ Whitney Design filed for chapter 11 bankruptcy in November 2009. Whitney's assets except subject ironing tables were sold to Household Essentials LLC in January 2010.

Note.—Because of rounding, figures may not add to the totals shown.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. Purchasers

The Commission received 13 usable U.S. purchaser questionnaire responses from firms that bought ironing tables during 2004-09.⁴⁰ Twelve of the responding purchasers are retailers and the 1 remaining purchaser is a distributor.⁴¹ Reported purchases from these 13 purchasers totaled *** ironing tables during 2004-09, which is *** percent of the quantity of total U.S. consumption of these products during this period.⁴²

The top three responding purchasers of ironing tables during 2009, in descending order, were ***. These three purchasers accounted for *** percent of apparent U.S. consumption of ironing tables during 2009.^{43 44} This is less than the approximately *** percent of apparent U.S. consumption of ironing tables accounted for by virtually the same top three purchasers in 2003.⁴⁵

Of the thirteen responding purchasers, six purchased predominantly the domestic products,⁴⁶ and the seven other firms purchased⁴⁷ exclusively or predominantly the imported Chinese products.⁴⁸

APPARENT U.S. CONSUMPTION

As shown in table I-7 and figure I-1, apparent U.S. consumption of ironing tables has been declining for most of the period for which data were collected. Apparent U.S. consumption in 2009 was *** percent lower than in 2004, and was *** percent lower than in the peak year of 2005.⁴⁹

⁴⁰ Of the 13 responding purchasers, 5 purchased the domestic ironing tables and the imported ironing tables from China, 4 purchased only the imported ironing tables from China, 2 purchased imported ironing tables from China and from third countries, 1 firm purchased domestic ironing tables and ironing tables imported from China and the Netherlands, and the 1 remaining firm purchased only the domestic ironing tables (this firm also imported ironing tables from China and other countries). Of the total purchase quantities reported during 2004-09, the domestic ironing tables accounted for *** percent, the imported ironing tables from China accounted for *** percent, and ironing tables imported from third countries (Germany, Italy, and The Netherlands) accounted for the remaining *** percent.

⁴¹ The lone responding distributor, ***, reported selling its ironing tables to retail housewares and variety stores.

⁴² *** was the only responding purchaser that also imported ironing tables. *** imported approximately *** ironing tables from China and *** ironing tables from all other countries during 2004-09. Adding these imports to the total reported purchases results in *** ironing tables accounted for by the responding purchasers during 2004-09, or *** percent of total apparent U.S. consumption of ironing tables during this period.

⁴³ This includes the *** ironing tables imported by *** during 2009.

⁴⁴ *** was the largest purchaser, accounting for *** percent of apparent U.S. consumption of ironing tables in 2009.

⁴⁵ *** were listed as the top three U.S. purchasers of ironing tables in 2003. Original staff report, confidential version, p. II-1.

⁴⁶ These six firms accounted for *** percent of the total reported purchases (and imports by ***) of ironing tables during 2004-09.

⁴⁷ One of these seven firms, ***, also imported ironing tables directly, primarily those produced in China.

⁴⁸ These seven firms accounted for *** percent of the total reported purchases (and imports by ***) of ironing tables during 2004-09.

⁴⁹ HPI has indicated that this is a “mature” industry. A trend toward wrinkle-free garments, as well as a more casual-dress in professional environments has caused apparent U.S. consumption to decline. This trend is amplified by a weaker economy beginning in 2008. ***.

Table I-7

Ironing tables: U.S. shipments of domestic product, U.S. shipments of imports, and apparent U.S. consumption, 2004-09

* * * * *

Note.— Data regarding U.S. shipments of imports from all sources during 2004-09 are public, and can be found in this report in table C-1.

Figure I-1

Ironing tables: Apparent U.S. consumption, by sources, 2004-09

* * * * *

U.S. MARKET SHARES

U.S. market share data are presented in table I-8. U.S. producer shipments as a share of apparent U.S. consumption increased by *** percentage points from 2004 to 2009. U.S. shipments of imports from China accounted for slightly less than *** of apparent U.S. consumption in four of the six years for which data were collected, but for only *** percent in 2007 and *** percent in 2009.

Table I-8

Ironing tables: U.S. consumption and market shares, 2004-09

* * * * *

PART II: CONDITIONS OF COMPETITION IN THE U.S. MARKET

U.S. CHANNELS OF DISTRIBUTION

HPI (the lone U.S. producer), U.S. importers of ironing tables from China, and U.S. importers of ironing tables from nonsubject countries reported in their questionnaire responses their annual U.S. shipment quantities of the subject products to three specified categories of customers during 2004-09. The shares of the reported shipment quantities relative to total reported shipments are shown by country and customer category in table II-1.

Table II-1

Ironing tables: Channels of distribution for domestic product and U.S. imports sold in the U.S. market (as a share of U.S. commercial shipments), annually, 2004-09

* * * * *

Total U.S. shipments to--						
Distributors	3.1	2.7	2.6	2.6	3.4	2.6
Retailers	86.6	87.6	87.6	87.5	87.3	88.4
Commercial users	10.3	9.6	9.8	9.9	9.3	8.9
Total	100.0	100.0	100.0	100.0	100.0	100.0
<p>Note.—Due to rounding, numbers may not add to totals. Individual allocations have been redacted for reasons of confidentiality.</p> <p>Source: Compiled from data submitted in response to Commission questionnaires.</p>						

As seen in table II-1, the largest customer category by far was retailers for all direct shipments of ironing tables during 2004-09, followed by direct shipments to commercial users, and lastly, by direct shipments to distributors.¹ Retailers sell their ironing tables almost exclusively to household consumers. Commercial users consist primarily of the hospitality market, where ironing tables are used in hotels and motels by travelers and in healthcare facilities.² *** responding importers and purchasers reported that there were no changes in types of customers or end users, no emergence of new markets for ironing tables during 2004-09, and no anticipated changes in these factors in the future.³ *** reported in its purchaser questionnaire responses that the U.S. ironing table market is stable for both products and vendors.

*** reported in its questionnaire response that the market power of the larger retailers of ironing tables has made it difficult for *** to pass along steel price increases. Purchasers commenting in their questionnaire responses on price leaders of ironing tables in the U.S. market identified Wal-Mart most frequently followed by Target as retail price leaders. On the supply side, they mentioned HPI, Polder (importer), and Whitney Design (importer) as wholesale price leaders.

In addition, two purchasers, *** (retailer) and *** (distributor) reported in their questionnaire responses that they compete with their suppliers for sales of ironing tables. *** indicated that its two

¹ This distribution is similar to that reported during the original investigation. Original staff report, confidential version, p. II-1.

² U.S. producer and importer questionnaire response, sections IV-21a and III-22a, respectively.

³ U.S. producer, importer, and purchaser questionnaire responses, sections IV-21-23, III-22-24, and III-5-7 and III-29, respectively.

suppliers also sell ironing tables on their company websites, and *** indicated that its suppliers have representatives that also sell in its sales area.

Although the predominant share of wholesale sales of ironing tables are to retailers the responding purchasers differ in terms of relative sizes and mix of U.S.-produced and imported ironing tables. Reported purchases of the 13 responding purchasers⁴ and their reported purchase quantities of ironing tables⁵ are shown in table II-2.

Table II-2
Ironing tables: Total purchases of ironing tables, by country sources, 2004-09

* * * * *

Regional Sales

HPI, four U.S. importers of ironing tables from China, and two U.S. importers of ironing tables from all other countries reported in their questionnaire responses the U.S. geographic market area(s) during 2009 where they shipped their domestic and imported ironing tables. The weighted-average U.S. shipment shares by each of the specified geographic areas for the subject products produced domestically, imported from China, and imported from all other countries are shown in the following tabulation.

U.S. geographic area	Share of U.S. shipments of ironing tables in 2009 (percent)		
	U.S.-produced	Imported from China	Imported from all other countries
Northeast ¹	***	22.9	***
Midwest ²	***	26.2	***
Southeast ³	***	20.6	***
Central Southwest ⁴	***	7.2	***
Mountains ⁵	***	8.3	***
Pacific Coast ⁶	***	12.8	***
Other ⁷	***	2.1	***
Total	100.0	100.0	100.0

¹ Includes CT, ME, MA, NH, NJ, NY, PA, RI, and VT.
² Includes IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.
³ Includes AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.
⁴ Includes AR, LA, OK, and TX.
⁵ Includes AZ, CO, ID, MT, NV, NM, UT, and WY.
⁶ Includes CA, OR, and WA.
⁷ Includes all other markets in the United States not previously listed, including AK, HI, PR, VI, among others.

Note.—Totals may not add to 100 due to rounding.

HPI and six U.S. importers of ironing tables from China reported in their questionnaire responses their lead times for delivery of their products and shipment shares that were from inventory and from

⁴ Twelve of the 13 responding purchasers are retailers and one, ***, is a distributor.

⁵ Total purchases also include direct imports by ***, the only responding purchaser that also imported ironing tables directly.

production during 2009. The weighted-average shipment shares and lead times are shown in the following tabulation.

Shipment source	U.S. ironing tables		Imported ironing tables from China	
	Share of U.S. shipments (percent)	Lead time (days) ¹	Share of U.S. shipments (percent)	Lead time (days) ¹
U.S. inventory	***	***	96.6	6
U.S. production	***	***	-	-
China inventory/production	***	***	3.4	59
Total	100.0		100.0	
¹ Average lead times were rounded to the nearest full day.				

U.S. MARKET CHARACTERISTICS

U.S. demand for ironing tables, principally a household consumer product, is driven largely by consumer preferences, where price, design, and quality features are important. Demand for metal-top ironing tables may also be affected by consumer demand for substitute products such as plastic-top ironing tables, tabletop ironing boards, ironing pads, hand steamers, over-the-door ironing boards and, to a lesser extent, wall-mounted ironing boards, and by demand for alternatives such as wrinkle-free clothing and dry cleaning services.

The T-leg ironing tables, including domestic and imported ironing tables, are the predominant type purchased in the United States. Perforated tops versus mesh tops may be differentiating features in ironing tables, but reportedly more so at the high-end of the market; a full discussion of the two different styles of tops appears in Part V. The mesh-top ironing tables may provide a more desirable ironing surface³ than perforated-top ironing tables. The U.S. producer offers primarily T-leg ironing tables with a perforated top but also some mesh-top tables, whereas the importers of the Chinese ironing tables offer only the mesh-top ironing tables and reportedly offer more diversity in the styles of ironing tables.

Supplier brand-name ironing tables may offer more features and higher price points than retailer private-label ironing tables, especially where brand-names have consumer recognition. HPI sells the vast majority of its ironing tables as private label products.⁴ An importer, Polder, sells mostly brand-name ironing tables that it imports from China;⁵ *** two other major importers of the Chinese ironing tables, ***, sell mostly *** products.⁶

³ Mesh-top ironing tables reportedly allow for increased passage of steam compared to perforated-top ironing tables.

⁴ HPI's posthearing brief, p. A-41.

⁵ Hearing transcript, p. 139-140 (Scott).

⁶ *** reported their imports of metal-top ironing tables by private label versus brand name during 2004-09. *** reported that all of its imported ironing tables from China during this period were *** tables (e-mail from ***, April 20, 2010). *** reported that *** tables (e-mail from ***, April 20, 2010).

Purchases of Ironing Tables Before and After the Order

Seven of the 13 responding U.S. purchasers of ironing tables reported that they purchased the imported ironing tables from China prior to the 2004 application of the antidumping duty order on the subject product from China.⁷ Three of these seven firms indicated that they have not changed their purchase patterns since 2004, another firm, ***, indicated that it discontinued its purchases due to the antidumping duty order, two other firms, ***, indicated that they changed their purchase pattern for other reasons, and the remaining firm did not comment. *** indicated that it increased its purchases of the imported ironing tables from China due to the styles available and sales performance. *** indicated that it increased its purchases due to sales volume.⁸

Four of six purchasers who had not purchased the imported ironing tables from China prior to 2004 reported in their questionnaire responses that they began purchasing the Chinese ironing tables after the antidumping duties were imposed. Only one of the four firms, ***, offered an explanation. The firm indicated that it began buying the Chinese ironing tables because the Rowenta brand ironing tables were not available from the U.S. producer, but the retailer has since reduced its purchases because it now has fewer retail outlets.

Information on Suppliers of Ironing Tables

U.S. purchasers were requested to provide information in their questionnaire responses on their suppliers of ironing tables during 2004-09. Their responses are summarized in the following discussion.⁹

Purchasers were requested to identify the number of suppliers that they contact in making a purchase of ironing tables. Of the 11 purchasers (all retailers) responding, nine reported contacting from 2 to 3 suppliers, one firm reported contacting 4 suppliers, and the remaining firm, ***, reported contacting 10 suppliers.

Purchasers were requested to indicate if their purchases of ironing tables involved negotiations with their suppliers. Of the 12 purchasers responding, 2 indicated no and the remaining 10 indicated that they negotiate with their suppliers. Negotiations include factors such as price, quantity, delivery schedules, timeliness, and product specifications/features; none of the responding purchasers reported quoting competing prices while several of the firms specifically indicated that they do not share competing prices. Five of the firms specifically noted that larger quantities purchased resulted in volume discounts.

Purchasers were requested to indicate if they vary purchases of ironing tables from a given supplier within a specific time period based on the price offered during that period. Of the 11 purchasers responding, 9 indicated no and 2 indicated yes. One of these latter two firms, ***, provided an explanation. The firm indicated that if it received a better price quote from that of its current supplier, it would request that the current supplier lower its price.

Purchasers were asked if they changed suppliers of ironing tables since 2004. Of the 12 firms responding, 4 indicated no and 8 indicated yes. The latter 8 purchasers each reported generally dropping and adding one supplier. *** reported that suppliers change infrequently and the change is usually based

⁷ U.S. purchaser questionnaire responses, section II-3.

⁸ One of the U.S. purchasers, ***, which indicated that its purchase pattern of ironing tables from China had not changed during 2004-09, actually *** ironing tables from China. This firm indicated that its Chinese supplier ***.

⁹ The 13 firms returning useable questionnaire responses reported having marketing knowledge of ironing tables sold in the United States that were produced domestically and imported from China, Germany, India, Italy, and the Netherlands. On the other hand, *** later reported that it had imported *** ironing tables from Taiwan during ***, but it did not know the producer(s) in Taiwan as it purchased these products *** (staff telephone interview with ***).

on new products offered, or, as with ***, its reported Chinese supplier, ***, was dropped because the company ***. *** reported that it changed its supplier to obtain a comprehensive ironing table and laundry accessory program from a single supplier at a good price.

Purchasers were asked if they were aware of any new suppliers of ironing tables, either domestic or foreign, since 2004, and whether they expected new suppliers to enter the market in the future. On the question of any new suppliers since 2004, 8 of the 12 responding purchasers reported no and 4 reported yes. The new suppliers cited by the latter 4 purchasers were typically new to the responding firm, not necessarily new in the market. New suppliers that were identified included Speedomax in India, as well as Honey Can Do and Whitney Designs in China. On the question of expected new suppliers in the future, all nine of the responding purchasers reported none.

Purchasers were requested to indicate whether they required their suppliers of ironing tables to be certified or prequalified. Four of the 10 responding purchasers required their suppliers to be qualified,¹⁰ and the six remaining firms did not require qualification. One of the four firms requiring qualification, ***, provided additional comments and reported qualifying its suppliers based on the vendors' financial history and a site inspection by *** to assure the vendors have proper quality assurance measures in place and capability to manage and produce the required volume. The remaining three purchasers requiring qualifications and the six not requiring qualifications all relied on product quality testing of their suppliers. All of the responding purchasers reported that their suppliers, domestic and foreign, had never failed when qualifying their ironing tables.

SUPPLY AND DEMAND CONSIDERATIONS¹¹

U.S. Supply¹²

U.S. Production

Based on available information, HPI may have had the ability to respond to changes in U.S. demand with substantial changes in the quantity of shipments of its U.S.-produced ironing tables to the U.S. market during 2004-09. *** was the major factor contributing to this degree of responsiveness of supply; the relevant factors are discussed below.¹³

Industry capacity

Based on HPI's reported fixed domestic capacity during 2004-09 and increasing production during 2004-07, its capacity utilization for ironing tables increased from *** percent in 2004 to *** percent in 2007, but decreasing production thereafter led to decreasing capacity utilization, which was *** percent in 2009. This level of capacity utilization indicates that the U.S. producer of ironing tables

¹⁰ The quantity of reported purchases of ironing tables in 2009 requiring qualification accounted for 9.5 percent of total reported purchases of ironing tables in that year.

¹¹ Short-run effects discussed in the supply and demand sections refer to changes that could occur within 12 months, unless otherwise indicated.

¹² Data on U.S. ironing table production, production capacity, capacity utilization, inventories, and exports are shown in detail in Part III.

¹³ HPI reported in its questionnaire response that ***.

may have had a *** amount of *** with which it could increase production of ironing tables in the short run in the event of an increase in demand during 2004-09.¹⁴

Inventory levels

HPI reported its end-of-period inventory quantities of its U.S.-produced ironing tables, which decreased *** during 2004-09 as a share of total shipments. End-of-period inventories ranged from a *** of *** percent of total shipments in 2009 to a *** of *** percent during 2006. The flexibility to use inventories to respond to price changes in the short run may be restrained to the extent that the U.S. producer's inventories consist of products that are not required by the increased demand, or consist of products already committed to customers in the U.S. market. HPI reported in its questionnaire response that ***. As a result, HPI may be constrained in its ability to use reported inventories to increase supply flexibility in the short run.

Alternate markets

HPI reported *** exports (***) of its U.S.-produced ironing tables during 2004-09, which averaged *** percent of its total shipments during this period.¹⁵ As a result, such exports may *** the supply flexibility of the U.S. producer in the short run, but only to the extent that its exported ironing table products consist of products useable/acceptable in the U.S. market, or consist of products not already committed to customers in its export markets.

Production alternatives

HPI reported in its questionnaire responses that it produced *** on some of the same equipment and with the same labor that were used to produce the subject ironing tables in the United States; this *** accounted for *** percent of its sales in 2009. Because of *** alternative production, its impact on HPI's ability to change production of ironing tables and the impact on measures of capacity and capacity utilization for U.S.-produced ironing tables may ***.

Supply of Imported Ironing Tables from China to the U.S. Market

Based on responses of six Chinese producers of ironing tables, staff believes that Chinese producers of ironing tables may have had some ability to respond to changes in U.S. demand with changes in shipments of ironing tables to the U.S. market during 2004-09. The main contributing factor to this supply flexibility is large third-country shipments; the relevant factors are discussed below.

Nine U.S. importers commented in their questionnaire responses on the availability of Chinese ironing tables in the U.S. market during 2004-09 and on the anticipated availability of these U.S. imports in the future. During the historical period, all nine firms indicated that availability of the ironing tables from China decreased after the initial antidumping duty orders went into affect in 2004 and decreased again in 2009 when the antidumping duties on ironing tables from two principal Chinese exporters of ironing tables to the United States (according to the importers), Since Hardware and Foshan Shunde, increased markedly. The decrease in availability during 2004-09 reportedly involved lower supply, higher prices, and limited design options of the imported ironing tables from China. Two of the

¹⁴ This supply flexibility may be constrained to the extent that there is any limited capability of the U.S. producer to produce the required types/styles and sizes of ironing tables demanded.

¹⁵ *** reported that ironing tables are difficult to export because of their weight and the space they occupy. *** asserted that *** (HPI's posthearing brief, exhibit 4).

responding importers, ***, indicated that the only viable Chinese factory for ironing tables with a zero duty rate is Forever Holdings, but it reportedly has an exclusive distribution agreement with a U.S. supplier, believed by these two importers to be HPI.¹⁶

Five of the nine responding importers commenting on anticipated changes in the future availability of the imported Chinese ironing tables in the U.S. market indicated no change, while three importers anticipated decreased availability, and the remaining importer indicated that it did not know what the future availability would be since it would be determined by the outcome of the Commission's review and future Commerce administrative reviews.¹⁷ The anticipated decrease in future availability of the Chinese ironing tables was based largely on the increased duty rates for the two main Chinese suppliers in late 2009.¹⁸

Industry capacity

Six Chinese producers reported the requested trade data and their combined capacity utilization for ironing tables fluctuated but averaged 85.9 percent during 2004-08, before decreasing to 70.7 percent in 2009.¹⁹ This level of capacity utilization, especially in 2009, indicates that Chinese producers of ironing tables had available capacity with which they could increase production of ironing tables in the short run in the event of a change in demand.

Three of the five responding Chinese producers reported producing several other products on the same equipment and machinery that they used to produce ironing tables, such that measures of capacity and capacity utilization for each type of product, including ironing tables, may be subject to allocations and may change as relative prices and demand for the various types of products change.

Inventory levels

The six responding Chinese producers of ironing tables reported combined end-of-period inventories in China that increased during 2004-09, ranging from 1.8 percent of total shipments in 2005 to 6.1 percent in 2009. These data indicate that Chinese producers may have an ability to use inventories as a means to increase shipments to the U.S. market in the short run. This flexibility may be restrained in the short run to the extent that Chinese producers' inventories consist of products not useable/acceptable in the U.S. market, or consist of products already committed to customers in home and/or third-country markets.

U.S. importers' end-of-period inventories of the Chinese ironing tables in the U.S. market during 2004-09 ranged from *** percent of total shipments of such imports in *** to *** percent in ***. Seven of eight responding U.S. importers reported in their questionnaire responses that they had no supply commitments or other restrictions to using their inventories to increase shipments to the U.S. market. The remaining importer, ***, reported that it had a number of quantity-specific short-term sales programs that

¹⁶ U.S. importer questionnaire responses, section III-27; and hearing transcript, p. 11 (Perry).

¹⁷ This latter importer, ***, further commented that it was confident that either this review will determine no injury by the Chinese ironing tables to the U.S. industry or that multiple Chinese producers will be deemed to be importing at an acceptable duty rate.

¹⁸ Four of five responding Chinese producers reported in their questionnaire responses that they anticipate no change in future availability of Chinese ironing tables in the U.S. market, whereas the remaining producer indicated that, if the antidumping duty is removed, it will increase business volume.

¹⁹ Chinese capacity to produce ironing tables increased by 53.8 percent during 2004-08, but decreased by almost 16.0 percent in 2009 from the level in 2008.

locked up item-specific inventory of ironing tables.²⁰ These data indicate that U.S. importers have an ability to use inventories as a means to increase shipments of the Chinese ironing tables in the U.S. market in the short run.

Alternate markets

Combining responses of the six reporting Chinese producers of ironing tables showed that their products were shipped principally to third-country markets,²¹ secondarily to the U.S. market, and thirdly to the home country market (the latter includes internal consumption/transfers) during 2004-09.²² These data indicate that Chinese ironing table producers have large third-country markets and, to a lesser extent, the home market, from which they may be able to shift shipments of ironing tables to the United States in the short run in the event of a change in demand in the U.S. market. This flexibility may be restrained in the short run to the extent that Chinese producers' sales of ironing tables exported to third-country markets and/or to their home market were not used/acceptable in the U.S. market, or to the extent that Chinese producers have binding supply agreements longer than 12 months with customers in third-country and/or home markets.

Production alternatives

Three of the five responding Chinese producers reported producing several other products on the same equipment and machinery that were used to produce ironing tables; the two remaining Chinese producers (***) reported producing only ironing tables. These other products represented *** percent of sales of these three firms in the most recent year. The three firms also indicated that they were able to shift production between ironing tables and the other products.²³ The ability of Chinese producers to shift production between ironing tables and other products enhances their supply responsiveness in the short run in response to relative price changes between ironing tables and alternative production products.

²⁰ *** U.S. inventories averaged about *** percent of total U.S. importers' end-of-period inventories of the Chinese products during 2004-09. This left a substantial amount of the other importers' inventories available to increase shipments to the U.S. market.

²¹ The European Union (EU) was the principal third-country market for Chinese ironing tables during 2005-09. The EU had imposed antidumping duties on many Chinese producers of ironing tables ranging from 18.1 to 38.1 percent in 2006. However, recent actions by the EU may change the impact of these duties. In 2009 the EU lifted the order on Foshan Shunde (though an investigation of this company was subsequently re-opened). In early 2010 the EU completed a new shipper review and assessed a 22.7 percent duty on imports of Chinese ironing tables produced by Greenwood Houseware (Zhuhai); this rate is lower than the EU-wide rate. (Various issues of the Official Journal of the European Union, April 26, 2007, L109/12; October 2, 2009, C 237/5; December 18, 2009, C 308/44; and January 28, 2010, L24/1).

²² During 2004-09, exports to third-country markets averaged *** percent of Chinese producers' total ironing table shipment quantities; shipments to the U.S. market averaged *** percent; and shipments to the home market accounted for the remaining *** percent. For third-country shipments, the European Union accounted for *** percent of total Chinese ironing table shipments to third-countries during this period, other non-Asian markets accounted for *** percent, and non-China Asian countries accounted for *** percent of the total.

²³ One of these Chinese producers, ***, indicated that its production process was engineered as a flexible production system, enabling the firm to change product mix in a flexible way.

Imports from Nonsubject Countries

Based on questionnaire responses, U.S. imports of ironing tables from countries other than China decreased markedly from *** units in 2004 to *** units by 2009, or by *** percent. Responding U.S. importers identified the following nonsubject countries as sources of ironing tables imported into the U.S. market: Germany, India, Italy, Latvia, Spain, Taiwan, and The Netherlands.

HPI and five U.S. importers of ironing tables reported in their questionnaire responses how the availability of ironing tables from nonsubject countries changed in the U.S. market during 2004-09. *** indicated that such availability had not changed, while *** reported some change and noted the presence of ironing tables in the U.S. market from Taiwan and/or India. On the other hand, *** indicated that it has not been able to identify any ironing table producers in Taiwan. In addition, at the hearing HPI and Polder reported that they were not aware of any U.S. imports of the subject ironing tables from Mexico and Polder also indicated that it was not aware of any imports from Taiwan.²⁴

HPI and six U.S. importers also reported on the anticipated availability of ironing tables in the U.S. market from nonsubject countries. *** expected no change in the future availability of ironing tables from nonsubject countries, and *** expected an increase, primarily from India and Vietnam. One of the importers expecting an increase, ***, asserted that it expected a major shift of U.S. imports of ironing tables from China to India in 2010, which it expected to continue over the next decade as new factories arise in India.²⁵ Another responding importer, the ***, reported that in 2010 it added *** from India as a source of its ironing tables.²⁶ Two of the importers expecting no change, ***, gave the following two reasons: (1) HPI reportedly would lower its prices in the face of any increase in imports of ironing tables from nonsubject countries; and (2) the dollar exchange rate reportedly will limit such exports to the U.S. market.

U.S. Demand

Demand for ironing tables, as measured by annual apparent U.S. consumption, fluctuated but decreased during 2004-09, by approximately *** percent on a quantity basis during this period. This downturn in demand was particularly strong in 2009, when apparent U.S. consumption fell by *** percent from the previous year.

Overall U.S. demand for ironing tables, primarily a consumer durable product,²⁷ reportedly moves with general economic activity in the U.S. economy and,²⁸ in particular, with household formation and home purchases.²⁹ U.S. demand for ironing tables also exhibits seasonal variation as reported by HPI,

²⁴ Hearing transcript, p. 56 (Volles) and p. 141 (Scott).

²⁵ *** reported that metal-top, floor-standing ironing table capacity in India for export to the U.S. market is ***.

²⁶ *** U.S. importer and purchaser questionnaire responses, sections III-28 and II-3/III-15, respectively.

²⁷ Due to the durability of ironing tables, consumers would be expected to replace these products infrequently; the major exception would be due to frequent changes in styling/features, which does not appear to occur with ironing tables (*** purchaser questionnaire responses, section III-5c). As a result, replacement demand is likely a small part of total demand for ironing tables.

²⁸ Demand for consumer durable goods, especially at the higher price points, generally has a tendency to be income elastic. An exception may be that, with a downturn in the economy, some consumers may purchase ironing tables as a substitute for more expensive dry cleaning services (hearing transcript, pp. 142-143 (Cooper and Scott)). Such countercyclical demand is likely a small part of total demand for ironing tables.

²⁹ *Ironing Tables and Certain Parts Thereof from China, Inv. No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, p. II-3, fn. 9.

seven of the eight responding U.S. importers, and 4 of the 11 responding purchasers.³⁰ Retailer demand is reportedly high during the summer months reflecting new household formation and back-to-college purchases, and household consumer demand is high during the summer and into the fall, with some uptick in consumer demand during March-April, when care for clothes reportedly increases.³¹ Retailer and consumer demand tends to be low after the back-to-college purchases, particularly during October-December, including the Christmas holiday season.^{32 33}

Business Cycles

HPI reported in its questionnaire response that ironing tables are a consumer durable good, which makes demand for this product subject to cyclical fluctuations. The firm further stated that durable goods purchases are often deferrable and tend to fall during economic downturns, which is true for ironing tables. HPI asserted that its ironing table sales ***, reflecting the cyclical downturn in consumer durables caused by the recession.

U.S. real gross domestic product (GDP), real personal consumption expenditures for durable goods, and housing starts during 2004-09 are shown in figure II-1 for quarterly real GDP and durable goods expenditures,³⁴ and figure II-2 for annual housing starts.³⁵ U.S. quarterly real GDP and durable goods expenditures generally increased during 2004-07, reaching period highs during the fourth quarter of 2007, but decreased throughout 2008. During 2009, quarterly real GDP decreased during the first two quarters and increased in the last two quarters, whereas durable goods expenditures increased in the first, third, and fourth quarters but decreased in the second quarter. Despite some recovery during 2009, real GDP and durable goods expenditures remained below their period highs. Although not shown in table II-1, quarterly real GDP and durable goods expenditure are forecast to increase throughout 2010; real GDP is forecast to recover to its period high by the third quarter of 2010.³⁶ Annual U.S. housing starts increased in 2005 from the level in 2004, but declined steadily thereafter through 2009. Not shown in figure II-2, housing starts are forecast to increase in 2010, but remain below their period high in 2005.³⁷

³⁰ U.S. producer, importer, and purchaser questionnaire responses, sections IV-31, III-29, and III-29, respectively.

³¹ In recent years, some retailers reportedly attempted a January spring cleaning event to try to increase sales. However, that did not drive incremental sales, it simply shifted first quarter sales a little bit earlier in the year (hearing transcript, p. 27 (Volles)).

³² Hotel industry demand for ironing tables reportedly peaks during May-August and is the lowest during November-February.

³³ A single importer and two purchasers provided some additional information regarding peak season demand periods in their questionnaire responses. The importer, ***, reported that promotional activities of retailers at the opening price points during seasonal upswings result in less demand for moderate and upscale ironing tables. A retailer/purchaser, ***, reported that it increases advertising during the peak consumer demand periods, and another retailer/purchaser, ***, reported that it purchases higher volumes of ironing tables for its back-to-college program, for which it receives a volume discount (from ***).

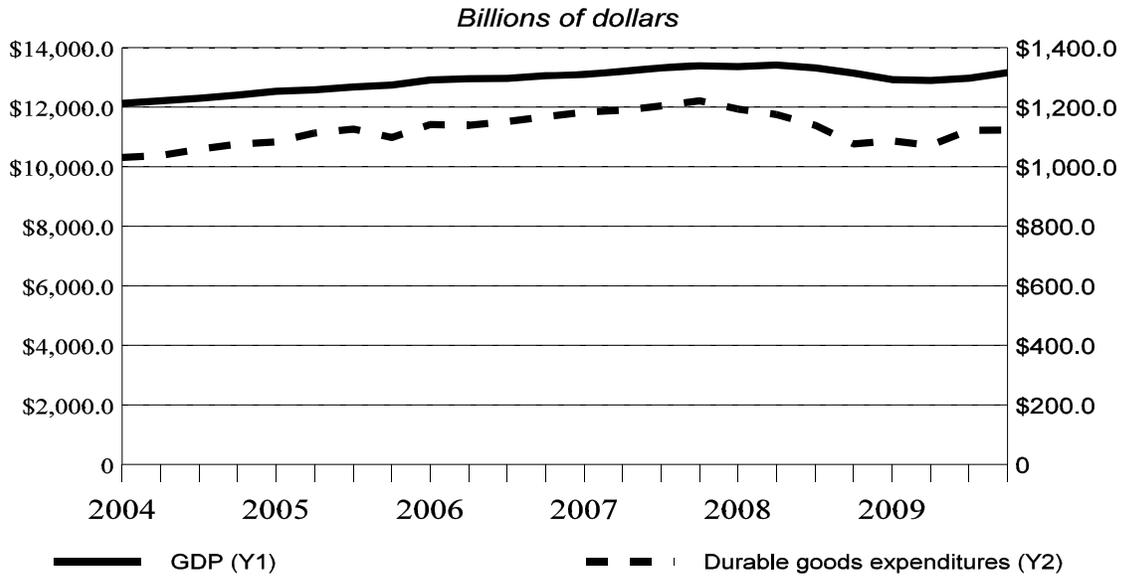
³⁴ U.S. quarterly real GDP and durable goods expenditures are seasonally adjusted annual rates based on chained 2005 dollars; *National Income and Product Accounts—Table 1.1.6, Real Gross Domestic Product, Chained Dollars*, Bureau of Economic Analysis, DOC, <http://www.bea.gov/national/nipaweb/>, retrieved March 23, 2010.

³⁵ U.S. annual housing starts are based on data from *Annual Housing Starts*, National Association of Home Builders, <http://www.nahb.org>, retrieved March 23, 2010; *New Privately-Owned Housing Units Started*, U.S. Census Bureau, <http://www.census.gov/const/startsa/pdf>, retrieved March 23, 2010.

³⁶ *Blue Chip Economic Indicators*, Aspen Publishers, Inc., Vol. 35, No. 4, April 10, 2010, p. 5.

³⁷ *Blue Chip Economic Indicators*, Aspen Publishers, Inc., Vol. 35, No. 4, April 10, 2010, p. 2.

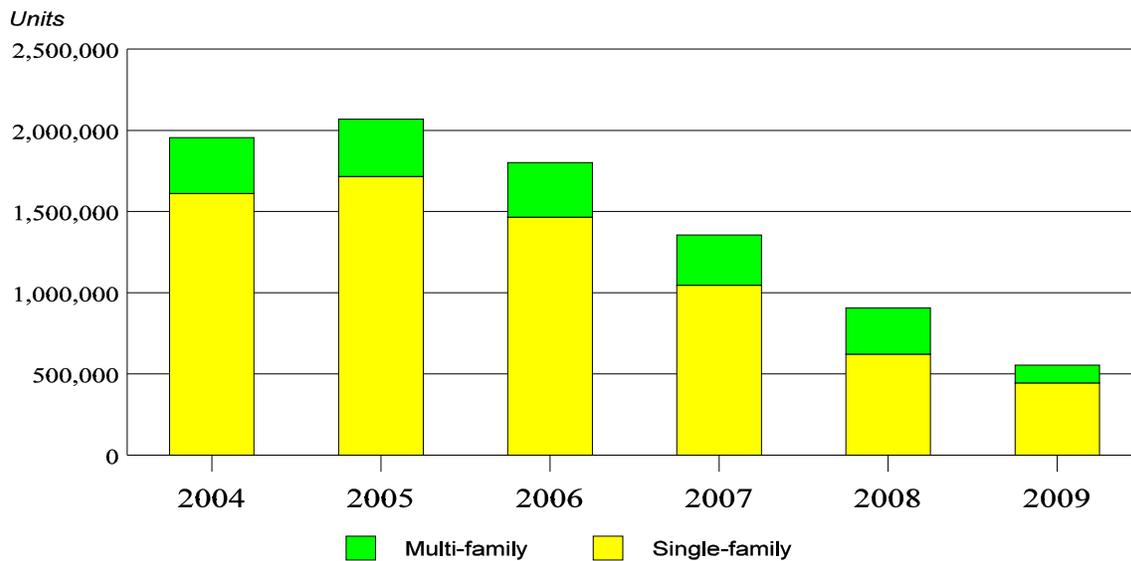
Figure II-1
U.S. real gross domestic product (GDP) and durable goods' expenditures: Real GDP and personal consumption expenditures for durable goods, quarterly, 2004-09



Note.--Real values are seasonally adjusted at annual rates and based on chained 2005 dollars.

Source: *National Income and Product Accounts--Table 1.1.6, Real Gross Domestic product, Chained Dollars*, Bureau of Economic Analysis, DOC, <http://www.bea.gov/national/nipaweb/>, retrieved March 23, 2010.

Figure II-2
U.S. housing starts: Number of new housing starts, annually, 2004-09



Source: For 2004-08--*Annual housing starts*, National Association of Home Builders, <http://www.nahb.org>, retrieved March 23, 2010; and for 2009--*New Privately-Owned Housing Units Started*, U.S. Census Bureau, <http://www.census.gov/const/startsua/pdf>, retrieved March 23, 2010.

Questionnaire Responses Concerning Changes in U.S. Demand

HPI, U.S. importers, and purchasers were requested to indicate in their questionnaire responses whether U.S. demand for ironing tables increased, decreased, fluctuated, or did not change since January 2004 and how they anticipate this demand will change in the future. Responses were mixed regarding U.S. demand. Useable responses are summarized in the following tabulation.

U.S. demand changes for ironing tables				
Types of firms	Number of firms responding			
	Increase	Decrease	Fluctuate	No change
	U.S. demand changes since January 2004			
U.S. producers	***	***	***	***
U.S. importers	***	***	***	***
U.S. purchasers	***	***	***	***
Total	1	6	4	7
Types of firms	U.S. demand changes anticipated in the future			
U.S. producers	***	***	***	***
U.S. importers	***	***	***	***
U.S. purchasers	***	***	***	***
Total	1	5	0	13

The questionnaire responses most frequently indicate that U.S. demand for ironing tables has not changed since 2004, followed closely by responses that demand has decreased. The majority of responses for anticipated future U.S. demand for ironing tables, led by purchasers, indicate no change in future demand, followed by responses that demand will decrease in the future.

With regard to historical U.S. demand for ironing tables, the responding firm that indicated increased demand referred only to hotel/motel demand and cited increased occupancy rates and available rooms. The responding firms that indicated decreased demand cited the slowdown in household formation, continuing development of wrinkle-free textiles, the downturn in the U.S. economy in 2008 and 2009, the longevity/durability of medium and upper-price ironing tables requiring fewer replacements, and the higher prices of ironing tables decreased demand, especially in the recent economy. The responding firms that indicated fluctuating demand cited reasons such as the downturn in the economy and, a single purchaser, ***, asserted that new technology in non-wrinkle fabrics has created a soft sales category in ironing tables. The responding firms that indicated no change in demand typically did not cite reasons.

Concerning future U.S. demand for ironing tables, the responding firm that indicated increased demand referred only to hotel/motel demand and cited increased demand as the economy recovers in 2010. The responding firms that anticipate decreased future demand cited a continually declining demand for ironing tables as availability of wrinkle-free clothing increases, continuing low economic growth, and a trend toward smaller homes leading to increased demand for other types of ironing surfaces and less demand for ironing tables. The responding firms that anticipate no change in demand typically did not cite reasons except for ***, which asserted that ironing table demand is flattening at about *** per year as housing starts are not expected to rise at a fast rate in the near term.

Substitute Products

The existence of substitutes and the durable nature of ironing tables suggest that U.S. household consumers and commercial users of ironing tables are likely to respond to changes in the prices of ironing tables with low to moderate changes in their total purchases of ironing tables, such that the price elasticity of demand for ironing tables may range from inelastic to somewhat elastic.³⁸ On the other hand, the low cost share of ironing tables in consumer and commercial user budgets may tend to reduce the price elasticity of demand.

HPI, U.S. importers, and purchasers identified and discussed in their questionnaire responses substitutes for ironing tables in the U.S. market during 2004-09, any changes in substitutes during this period, and any anticipated changes in substitutes in the future. HPI, six of the seven responding U.S. importers, and 8 of the 10 responding U.S. purchasers identified substitutes/alternatives, whereas the remaining single importer and the two remaining purchasers indicated that there were no substitutes for ironing tables. The substitute products/alternatives and the number of responses identifying the products are shown in the following tabulation.

³⁸ The price elasticity of demand for a particular product is higher the greater the number of substitutes. In addition, the price elasticity of demand for consumer durables is generally higher than that for consumer nondurables.

Substitutes/alternatives for ironing tables (Number of responses)				
Type of substitute/alternative	U.S. producer	U.S. importers	U.S. purchasers	Total
Table/counter top ironing boards	***	***	***	9
Over-the-door ironing boards	***	***	***	6
Built-in/wall-mounted ironing boards	***	***	***	4
Pads/mats for ironing on tables	***	***	***	3
Hand-held garment steamers	***	***	***	2
Non-steel top ironing tables ¹	***	***	***	1
All other ironing boards	***	***	***	1
Dry cleaning	***	***	***	1
Wrinkle-free/iron-free clothing/fabrics	***	***	***	1
Total	***	***	***	28

¹ Respondent interested parties (Polder, Whitney Design, and Since Hardware) asserted that plastic-top ironing tables are replacing metal-top ironing tables, particularly in the lower price points, because the plastic-top tables are lighter and will not rust vis-a-vis the metal-top tables (respondent interested parties' prehearing brief, pp. 15-17 and appendix PH-8). In addition, HPI imports a plastic-top ironing table from China called the Revolution 360, which is produced by *** (HPI's posthearing brief, exhibit 2, attachment 3). In addition, websites, such as those of HSN and Bed Bath & Beyond, feature the Revolution 360 ironing table and HSN's website indicates that it is produced in China (http://home-solutions.hsn/homez-revolution-360-ironing-board-with-insert-and-clip_p-5364550_xp..., and http://www.bedbathandbeyond.com/product.asp?order_num=-1&SKU=16424501).

Note.—Some responding firms reported more than one alternative product.

Substitutes/alternatives to ironing tables that more than one firm cited are, in descending order, the following: table/counter-top ironing boards, over-the-door ironing boards, built-in/wall-mounted ironing boards, table ironing pads/mats, and hand-held garment steamers. All of the responding firms identifying substitutes/alternatives indicated that these products were used by households and/or students, but that changes in the prices of the substitutes/alternatives did not affect the price for ironing tables. *** provided follow-up comments on the substitutes/alternatives. *** asserted that ***.³⁹ *** asserted that the substitute/alternative products are not perfect substitutes and, as a result, do not work in the same way as an ironing table and many have operational constraints that prevent the end user from using the products in the same manner as an ironing table.

³⁹ *** cited in its questionnaire response the following ConsumerSearch article: “Most experts agree that a garment steamer cannot completely replace an iron for all of your clothing. The Good Housekeeping review notes that while garment steamers can be an alternative for a traditional steam iron, garment steamers struggle with sharp creases and stiff fabrics, like dress shirts. An advantage to garment steamers is that a quick steam can refresh garments between dry cleanings, perk up creased coats taken out of storage, and smooth wrinkles from a rarely worn cocktail dress (Garment Steamers at <http://www.consumersearch.com/garment-steamers/review>, October 2009).

Six of the seven responding U.S. importers and eight of the nine responding purchasers reported that no changes occurred in substitutes/alternatives for ironing tables during 2004-09, whereas HPI, one U.S. importer, and one purchaser reported changes during this period and provided follow-up comments. HPI indicated that ***. An importer, ***, noted the following three changes in substitutes/alternatives: (1) increased availability of wrinkle-free clothing at all price points; (2) hardware supercenters carry built-in DIY ironing boards (Home Depot, Lowes, and Menards); and (3) mini boards and pressing cloths are available on the internet. A purchaser, ***, remarked that hand-held garment steamers have increased in popularity.

HPI, six of the eight responding U.S. importers, and 9 of the 10 responding U.S. purchasers reported that they anticipated no changes in substitutes/alternatives for ironing tables in the future, whereas two U.S. importers and a single U.S. purchaser anticipated changes in the future. One importer, ***, which anticipated future changes, provided additional information. The importer asserted that very few consumers take pleasure in ironing such that technological advances in clothing will further reduce the need for ironing.

At the hearing, both HPI and an importer, Polder, provided additional discussion of plastic-top ironing tables as a possible substitute for metal-top ironing tables currently and in the future.⁴⁰ Plastic-top ironing tables appear to be a relatively new and currently a limited product in the U.S. market.⁴¹ HPI indicated that its imported plastic-top ironing table, the Revolution 360,⁴² is priced higher than its professional metal-top ironing table and, because the plastic top can be rotated, does not compete with any of its metal-top ironing tables.⁴³ HPI also indicated that its Revolution 360 ironing table positions the firm in the marketplace as an innovative leader.⁴⁴ HPI further states that it has seen few plastic-top ironing tables in the U.S. market, that it does not know if the consumer will accept such an ironing table, and that it does not expect much growth in the market place for this product in the foreseeable future.⁴⁵ On the other hand, Polder indicated that plastic-top ironing tables have been imported into the U.S. market by several firms and are sold across the product range (from T-leg to more expensive boards) in direct competition with metal-top ironing tables at price points similar to the metal-top tables.⁴⁶ HPI and

⁴⁰ Both companies indicated that plastic-top ironing tables are being imported into the U.S. market to avoid the antidumping duty order on metal-top ironing tables from China (hearing transcript, p. 64 (Ikenson) and p. 130 (Cooper)). Polder indicated advantages of the plastic-top table in that it is lighter and can be shaped more easily than the metal-top table (hearing transcript, p. 128, (Cooper)).

⁴¹ Polder indicated that, although new in the U.S. market, plastic-top ironing tables have been widely accepted for quite some time in Asia, Japan, and parts of the Middle East (hearing transcript, pp. 128-129 (Scott)).

⁴² HPI indicated that it has one version of this product produced in China and another version produced in Korea (hearing transcript, p. 102 (Volles)).

⁴³ Hearing transcript, p. 63 (Volles).

⁴⁴ Ibid.

⁴⁵ Hearing transcript, pp. 63 and 65 (Volles). HPI reported that it *** (HPI's posthearing brief, exhibit 2, attachment 3).

⁴⁶ Hearing transcript, pp. 117 and 127-128 (Scott). *** reported importing *** floor-standing plastic-top ironing tables from China in 2009. In addition, *** reported importing *** floor-standing plastic-top ironing tables from China during January-March 2010 and selling *** of these tables during this period. (E-mail from ***, April 20, 2010.)

Polder indicated that the cost of plastic is higher than the cost of steel on a per pound basis,⁴⁷ and Polder noted that the cost of plastic and steel both fluctuate.⁴⁸

Cost Share

The cost share of ironing tables relative to the total budget of household consumers and commercial users is likely low. HPI, U.S. importers, and purchasers commented in their questionnaire responses on the cost share of ironing tables in household consumer budgets and in commercial user budgets. The responding U.S. importers and purchasers indicated that either these cost shares were low or they did not know the cost shares. *** provided the most complete response. For households, *** indicated that ironing tables are a relatively small share of household budgets because of their low price and durability (lasting 10 years or more). *** asserted that a large proportion of ironing tables are purchased when setting up a new household and the cost of an ironing table is small relative to other costs in a new home. For hotels and motels, *** cited a recent hotel survey that showed the cost of furniture, fixtures, and equipment in a hotel room ranges from \$8,500 to \$23,200,⁴⁹ such that a \$15 to \$30 ironing table would represent a minuscule portion of that budget.

SUBSTITUTABILITY ISSUES

The degree of substitution in demand between ironing tables produced in the United States and ironing tables imported from China depends upon such factors as relative prices, conditions of sale (e.g., delivery lead times, reliability/availability of supply, technical service, etc.), purchaser supply requirements, qualified status of supplier, and product differentiation. Product differentiation among different ironing tables depends on factors such as physical characteristics (e.g., sizes, types (perforated-versus mesh-top), T-leg versus 4-leg or other leg designs, accessories, etc.), brand name recognition, consumer preferences, and the market perception of these factors. Based on the reported information in this review, there appears to be at least moderate substitution in demand between domestic ironing tables and those imported from China.

HPI and U.S. importers of the subject ironing tables were requested to describe in their questionnaire responses any significant changes in the product range, product mix, or marketing of ironing tables in the United States since January 2004 and any anticipated future changes. With respect to any historical changes, *** reported no changes, but *** reported some changes since January 2004. The changes identified included the following: (1) ironing table brands are now made with recycled steel; (2) more decorative ironing tables available with powder coated legs; (3) since the 2004 antidumping duty order prices for ironing tables have increased, which recently channeled new sales to less expensive models; (4) when the economy was growing, high-priced ironing tables were popular as retailers tried to increase their margins with these products; and (5) less innovation has been brought to the ironing table market place.

⁴⁷ Household Essentials reported that there is more plastic material than steel in a mesh-top ironing table. The firm also indicated that plastic-top tables cannot be produced as quickly as perforated-top tables, but plastic top tables are more ergonomically designed than the perforated metal-top tables. Respondent interested parties' posthearing brief, p. 26.

⁴⁸ Hearing transcript, pp. 9 and 64 (Ikenson and Volles), and pp. 130 and 150 (Cooper and Scott).

⁴⁹ The survey referred to is the following: "Elaine Sahlins, Hotel Development Cost Survey, 2009," reported on November 17, 2009 at www.hvs.com (***).

With respect to any anticipated future changes, *** reported that they expected no changes.⁵⁰ *** cited some expected future changes, including the following: (1) an increase in the price of ironing tables, particularly at the mid and low price points, if the antidumping duty order is continued; (2) sales of high-end ironing tables mostly through the internet; (3) a temporary decrease in product range due to the viable producers in China receiving increased duty-rates, with a reversal, likely as early as March 2010 as ironing table production in India gears up;⁵¹ (4) a decrease in ironing table demand as clothing technology improvements continue to eliminate the need for ironing; and (5) a switch to smaller ironing boards (tabletop, etc.) as an asserted trend toward smaller homes continues.

At the hearing, both HPI and an importer, Polder, discussed competition between private (retailer) label ironing tables and supplier brand-name ironing tables in the U.S. market. HPI and Polder indicated that large retailers (Walmart, Target, K-Mart, etc.) sell principally their own private label ironing tables, whereas smaller retailers sell mostly the brand name ironing tables.⁵² Although HPI and Polder sell both their brand name ironing tables (the Homz brand⁵³ and Polder brand, respectively) and private label ironing tables, HPI reported selling a majority of its ironing tables as private label ironing tables,⁵⁴ while Polder reported selling mostly its brand name ironing tables.⁵⁵ According to HPI, the brand name does not necessarily influence the price point of ironing tables.⁵⁶ On the other hand, Polder reported that its supplier brand name enables the firm to sell a higher-priced ironing board that is heavier with a wider board and more features; whereas most of the private label brands retail for \$30 and below.⁵⁷

⁵⁰ Although *** indicated that the product range and mix will remain unchanged in the future, it reported that the firm would continue to develop innovative ironing tables and improve the value of its ironing tables.

⁵¹ A U.S. importer, ***, indicated in its questionnaire responses that it has been shifting its U.S. imports of ironing tables from China to India, which will be completed by ***.

⁵² Hearing transcript, pp. 57 and 91 (Volles) and p. 140 (Scott).

⁵³ HPI reported that ***; submitted separately on February 4, 2010 in response to question I-8 of the U.S. producer questionnaire).

⁵⁴ In addition, HPI reported that, based on its annual sales values of the domestic ironing tables, it sells about *** percent under private labels and *** percent under the Homz brand name (HPI's posthearing brief, pp. A-41-42).

⁵⁵ Hearing transcript, p. 57 (Volles) and pp. 139-140 (Scott). Polder also indicated that other importers of ironing tables from China tend to sell private label ironing tables (hearing transcript, p. 160 (Scott)). Two other large importers of ironing tables from China, ***, reported their imports of these ironing tables by private label versus brand name during 2004-09. *** reported that *** tables (e-mail from *, April 20, 2010). *** reported that *** tables (e-mail from ***, April 20, 2010).

⁵⁶ Hearing transcript, p. 75 (Volles).

⁵⁷ Hearing transcript, p. 140 (Scott) and p. 152 (Cooper).

Factors Affecting Purchasing Decisions

U.S. purchasers were requested in their questionnaire responses to list the top three factors that they consider when deciding from whom to purchase ironing tables. Responses of the 12 reporting purchasers are shown in the following tabulation.

Factors	Number of purchasers responding		
	First important factor	Second important factor	Third important factor
Price	4	5	4
Quality	5	4	1
Availability	1	2	4
Reliable supplier	1	1	1
Complete laundry accessory program	1	-	-
Product features	-	-	1
Product line	-	-	1
Service	-	-	1
Note.—In addition to listing their top three factors, *** also reported reliability and *** reported availability as additional factors considered by their firms.			

As shown in the tabulation, price and quality were reported most frequently as the most important and second most important factors, and price and availability were reported most frequently as the third most important factor. Purchasers also reported that quality considerations of ironing tables included construction of the top, thickness of steel in legs, ease of operation/locking mechanism, stability, silicone iron rust coating, cover fabric/print, accessories/extra features, and appearance of the table and pad.

Thirteen U.S. purchasers responded to a request in the purchaser questionnaire to rank 15 specified purchase factors as ‘very important’, ‘somewhat important’, or ‘not important’. The total number of responses is shown in table II-3 for each purchase factor. Three purchase factors--availability, product consistency, and product quality meets standards--were considered most frequently to be ‘very important’ purchase factors for ironing tables;⁵⁸ these factors were followed closely by price and reliable supply as ‘very important’. Product quality exceeds standards and technical support was considered most frequently to be ‘somewhat important’, followed by minimum quantity requirements and product range. U.S. transportation costs was considered most frequently to be ‘not important’, followed by extension of credit.

⁵⁸ Price, quality, and availability, in descending order, were reported as the top purchase factors in another part of the purchaser questionnaire and were discussed earlier.

Table II-3
Ironing tables: Ranking of purchase factors, as reported by U.S. purchasers of ironing tables

Purchase factors	Very important	Somewhat important	Not important
Availability *	13	-	-
Delivery terms	9	4	-
Delivery time	9	4	-
Discounts offered	3	6	3
Extension of credit	3	6	4
Price *	12	1	-
Minimum quantity requirements	3	7	2
Packaging	6	6	1
Product consistency	13	-	-
Product quality meets standards *	13	-	-
Product quality exceeds standards	4	9	-
Product range	5	7	1
Reliable supply	12	1	-
Technical support	2	9	2
U.S. transportation costs	3	3	7

Note.—The top 3 purchase factors as discussed earlier are identified with asterisks.

Source: Compiled from data submitted in response to Commission questionnaires.

Comparisons of the Domestic Products and Subject Products from China from Third Countries

HPI, U.S. importers, and purchasers of ironing tables were requested in their questionnaire responses to report on the extent of interchangeability among the various country sources of ironing tables in the U.S. market. In addition, U.S. producers and importers were requested to report on the extent of any differences other than price that would affect sales in the U.S. market among the various country sources of ironing tables.

Responses of HPI, the eight reporting importers, and the 10 reporting purchasers regarding the degree of interchangeability between domestic and imported ironing tables are summarized in table II-4. Responses of HPI and the five reporting importers regarding differences other than price affecting competition are summarized in table II-5 for comparisons involving the U.S.-produced and imported ironing tables.

HPI and the responding U.S. importers and purchasers generally reported that U.S.-produced ironing tables and those imported from China and third countries are generally ‘always’ or ‘frequently’ interchangeable. HPI reported that factors other than price were *** a factor in competition among the domestic and imported ironing tables. On the other hand, responding U.S. importers reported more frequently that such factors were always a factor, especially between the domestic and imported Chinese ironing tables. Two importers, ***, indicated that quality, innovation, and a variety of options were other important factors.

Table II-4

Ironing tables: Perceived degree of interchangeability among U.S.-produced ironing tables and those imported from China and third countries, based on sales in the U.S. market during 2004-09

Country pair	Number of U.S. producers' responses				Number of U.S. importers' responses				Number of U.S. purchasers' responses ¹			
	A	F	S	N	A	F	S	N	A	F	S	N
United States vs.--												
China	***	***	***	***	2	2	2	1	6	1	-	-
Taiwan	***	***	***	***	2	1	-	1	1	-	-	-
Other countries ¹	***	***	***	***	1	1	1	1	1	-	1	-
China vs.--												
Taiwan	***	***	***	***	2	1	-	1	1	-	-	-
Germany	***	***	***	***	-	-	-	-	1	-	-	-
Italy	***	***	***	***	-	-	-	-	-	-	1	-
Other countries ¹	***	***	***	***	1	2	-	1	1	-	-	-
Taiwan vs.--												
Other countries ¹	***	***	***	***	1	1	-	1	-	-	-	-
¹ None of the responding firms identified specific other countries. Note.--A = Always, F = Frequently, S = Sometimes, N = Never. Source: Compiled from data submitted in response to Commission questionnaires.												

Table II-5

Ironing tables: Perceived degree of importance of differences in nonprice factors among U.S.-produced ironing tables and those imported from China and third-countries, based on sales in the U.S. market during 2004-09

Country pair	Number of U.S. producers' responses				Number of U.S. importers' responses			
	A	F	S	N	A	F	S	N
United States vs.--								
China	***	***	***	***	4	-	1	-
Taiwan	***	***	***	***	-	-	1	-
Other countries ¹	***	***	***	***	1	-	1	-
China vs.--								
Taiwan	***	***	***	***	-	-	1	-
Other countries ¹	***	***	***	***	-	-	1	-
Taiwan vs.--								
Other countries ¹	***	***	***	***	-	-	1	-
¹ None of the responding firms identified specific other countries. Note.--A = Always, F = Frequently, S = Sometimes, N = Never. Source: Compiled from data submitted in response to Commission questionnaires.								

Country of origin and producer identity do not appear to be important for U.S. retailers or distributors of ironing tables. All 13 responding purchasers reported in their questionnaire responses that the country of origin was ‘sometimes’ or ‘never’ important in their purchases of ironing tables.⁵⁹ Ten of 13 responding purchasers reported that the identity of the producer of the ironing tables was ‘sometimes’ or ‘never’ important in their purchases of such products, whereas the 3 remaining firms reported that the identity of the producer was ‘always’ or ‘usually’ important.⁶⁰ Three retailer purchasers, ***, provided some further explanation about when country-of-origin or the specific producer are important. *** indicated country of origin would be considered if there were import restrictions. *** indicated that it chose the *** brand of ironing table, so that the specific producer was important. *** indicated that for its ***, it uses *** to respond quickly to market demand.⁶¹

All 12 responding purchasers reported in their questionnaire responses that they did not purchase ironing tables from one country in particular over other possible sources of supply during 2004-09.⁶² In addition, 10 of the 11 responding purchasers reported that certain types/sizes of ironing tables were not exclusively available from a single country source.⁶³ The remaining responding purchaser, ***, reported that better higher-end ironing tables with additional features were offered from China.

Purchasers were requested in their questionnaire responses to make country-of-origin comparisons among the domestic ironing tables and those imported from China and third countries for which they have market knowledge based on the 15 specified purchase factors discussed earlier, and to indicate for each purchase factor whether product from one country was ‘superior’, ‘comparable’, or ‘inferior’ to product from another country. Eight purchasers responded, but not for every country/country category comparison; purchaser responses are summarized in table II-6. The U.S.-produced ironing tables were generally comparable to the imported ironing tables from China and India, the two import-country sources reported. The single exception was price where the domestic ironing tables were rated ‘inferior’ more frequently than for any other factor in comparison with the products from China and India.

⁵⁹ All the responding purchasers reported in their questionnaire responses that the domestic and/or imported ironing tables from China, Italy, or the Netherlands (the only countries that they reported for this question) ‘always’ or ‘usually’ met their minimum quality specifications.

⁶⁰ The purchasers also reported that their customers, mostly household consumers, felt similarly as the retailers and one distributor about the importance of country-of-origin and identity of the producer in their purchases of ironing tables.

⁶¹ ***, however, differed from other purchasers in the emphasis it placed on domestic supply.

⁶² In addition, 12 of 13 responding purchasers reported that purchasing the domestic product was not important in their purchases of ironing tables. The single remaining purchaser, ***, reported that its purchases of the domestic ironing tables have a shorter lead time and are required to respond as needed for its back-to-college program.

⁶³ One of these 9 purchasers, ***, indicated that HPI had the largest product availability and variety of the T-leg style of ironing table.

Table II-6

Ironing tables: Comparisons of domestic ironing tables vis-a-vis imported ironing tables from China and India, based on sales in the U.S. market during 2004-09

Purchase factors	U.S.-produced products compared to imported products from-					
	China			India		
	S	C	I	S	C	I
Availability *	-	8	-	-	1	-
Delivery terms	-	8	-	-	1	-
Delivery time	3	5	-	1	-	-
Discounts offered	-	8	-	-	1	-
Extension of credit	1	7	-	-	1	-
Price ¹ *	2	3	3	-	-	1
Minimum quantity requirements	2	6	-	-	1	-
Packaging	2	5	1	-	1	-
Product consistency	-	8	-	-	1	-
Product quality meets standards *	-	8	-	-	1	-
Product quality exceeds standards	1	6	1	-	1	-
Product range	3	5	-	-	1	-
Reliable supply	-	8	-	-	1	-
Technical support	1	6	-	-	1	-
U.S. transportation costs ¹	1	6	1	-	1	-

¹ A rating of "S" on price and/or transportation costs indicates that the U.S. product has lower prices or transportation costs than the product from the country with which it is being compared.

Note.-S=superior, C=comparable, and I=inferior.

Note.-The overall top 3 purchase factors as discussed earlier are identified with asterisks.

Source: Compiled from data submitted in response to Commission questionnaires.

ELASTICITY ESTIMATES⁶⁴

U.S. Supply Elasticity

The domestic supply elasticity for U.S.-produced ironing tables measures the sensitivity of the quantity supplied by the U.S. producer to a change in the U.S. market price of these products. The elasticity of domestic supply depends on several factors including the U.S. producer's level of excess capacity, the ease with which the U.S. producer can alter its productive capacity, the existence of inventories, and the availability of alternate markets for domestic ironing tables. Analysis of these factors indicates that, due principally to unused production capacity, the U.S. producer had flexibility in the short run to alter its supply of ironing tables to the U.S. market in response to relative changes in the demand for their products. The domestic elasticity of supply for ironing tables is estimated to be in the range of 4-8.

U.S. Demand Elasticity

The U.S. price elasticity of demand for ironing tables measures the sensitivity of the overall quantity demanded for ironing tables to changes in the U.S. market price of ironing tables. The price elasticity of demand depends on factors discussed earlier such as the existence and availability of substitute products for ironing tables and alternatives to household ironing, such as wrinkle-free clothing and dry cleaning. Based on available information, the demand elasticity for ironing tables is estimated to be in the range of -0.5 to -1.5.⁶⁵

Substitution Elasticity⁶⁶

The elasticity of substitution largely depends upon the degree to which there is an overlap of competition between domestic ironing tables and imported ironing tables from China, and the extent of product differentiation. Product differentiation, in turn, depends on such factors as physical characteristics (e.g., sizes, types (perforated- versus mesh-top), T-leg versus 4-leg or other leg designs, accessories, etc.), brand name recognition, consumer preferences, and conditions of sale (e.g., delivery lead times, reliability/availability of supply, technical service, etc.). Based on available information discussed earlier, the elasticity of substitution between domestic ironing tables and imported ironing tables from China is estimated to be in the range of 2-5.

⁶⁴ The suggested ranges for the various elasticities were presented in the prehearing report for purposes of discussion in the prehearing briefs, hearing testimony, and/or posthearing briefs. Although there were no discussions of the elasticity ranges, HPI asserted that demand was price inelastic (HPI's prehearing brief, p. 11). The elasticity responses in this section refer to changes that could occur within 12 months, unless otherwise indicated.

⁶⁵ The greater the effect of substitutes for ironing tables, the closer the elasticity is to the higher end of the range.

⁶⁶ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the imports and the U.S. domestic like product to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the imported product (or vice versa) when prices change.

PART III: CONDITION OF THE U.S. INDUSTRY

OVERVIEW

Information presented in this section is based on the questionnaire response of one firm, HPI, that accounted for all U.S. production of ironing tables during the period for which data were collected.^{1 2} HPI reported that it does not anticipate any changes in the character of its operations relating to the production of ironing tables. Table III-1 summarizes important events that have taken place in the U.S. industry since January 1, 1998.

Table III-1
Ironing tables: Survey of U.S. industry events since January 1, 1998

Period	Description of event
January 1998	HPI acquires Seymour Housewares, leading supplier of laundry management products in the United States.
April 2002	Whitney Designs halts U.S. production of ironing tables
November 2004	Home Products International – North America, Inc. is purchased by Private Equity Groups led by Equity Group International, Inc., Walnut Group, and Triyar Capital. Company delisted from NASDAQ exchange. New management team installed.
December 2006	HPI files for Chapter 11 bankruptcy.
March 2007	Third Avenue Management becomes majority shareholder of HPI.
November 2007	***.
December 2007	***.
January 2008	HPI decides to close its East Plant, which produces its 4-leg ironing tables, and ***.
November 2009	Whitney Design files for Chapter 11 bankruptcy.
January 2010	Whitney Design's assets except subject ironing boards are sold and Whitney Design ceases operations. ¹
<p>¹ Most of Whitney Design's assets and certain liabilities were purchased by Household Essentials, LLC under a bankruptcy court approved code section 363 sale order on January 29, 2010. Whitney Design ***. At the time of the 363 transaction, ***.</p> <p>Source: Compiled from data submitted in response to Commission questionnaires; E-mail from ***, April 15, 2010; HPI's posthearing brief, exh. 2; "http://www.chicagobusiness.com/cgi-bin/news.pl?id=23253," retrieved March 16, 2010; "http://www.hpil.com/corporate/aboutus.aspx," retrieved March 11, 2010; "http://stlouis.bizjournals.com/stlouis/stories/2009/11/30/story6.html," retrieved April 27, 2010; "http://stlouis.bizjournals.com/stlouis/stories/2010/02/01/daily34.html," retrieved April 27, 2010; and "http://www.tribtown.com/news/company-6044-home-seymour.html," retrieved April 27, 2010.</p>	

¹ *** reported no production or sales of ***.

² As discussed in greater detail below, ***.

U.S. CAPACITY, PRODUCTION, AND CAPACITY UTILIZATION

U.S. producers' capacity, production, and capacity utilization data for ironing tables are presented in table III-2.³ Overall domestic capacity has remained consistent throughout the period for which data were collected.⁴ HPI's production and capacity utilization steadily increased during 2004 to 2007, but declined in 2008 and 2009. HPI reported in its questionnaire that the *** in production ***. HPI maintains that the recession is the cause for the decrease in production during 2008 and 2009. HPI primarily produces perforated-top T-leg models, although the company also produces mesh-top T-leg models and perforated and mesh-top 4-leg models.⁵

Table III-2
Ironing tables: U.S. capacity, production, and capacity utilization, 2004-09

* * * * *

In addition to metal-topped ironing tables, HPI also produces over-the-door ironing boards in the same facilities. HPI does not produce plastic-topped ironing tables, but rather ***.⁶

U.S. PRODUCER'S SHIPMENTS

Table III-3 presents data on HPI's shipments of ironing tables. The domestic commercial market accounted for *** of HPI's U.S. shipments of ironing tables and for more than *** percent of HPI's total shipments of ironing tables throughout the period for which data were collected in this review. Export shipments, which accounted for less than *** percent of HPI's total shipments of ironing tables throughout the period, were to ***. ***.⁷

Table III-3
Ironing tables: U.S. producer's shipments, by types, 2004-09

* * * * *

U.S. PRODUCERS' INVENTORIES

As shown in table III-4, HPI, generally maintained inventories equivalent to *** of total shipments over the period for which data were collected. Inventories increased from 2004 to 2006 but decreased during 2007-09, reaching *** in 2009.

Table III-4
Ironing tables: U.S. producer's end-of-period inventories, 2004-09

* * * * *

³ ***. ***.

⁴ The manufacturing bottleneck that constrains HPI's capacity is its ***. ***.

⁵ HPI estimates that the opening price point T-leg style with a perforated top and 4-legged mesh top ironing tables account for *** percent of the U.S. market for ironing tables. ***.

⁶ HPI ***. HPI's posthearing brief, exh. 2, att. 3.

⁷ HPI's posthearing brief, exh. 4.

U.S. PRODUCERS' IMPORTS AND PURCHASES

HPI imported ***. HPI's *** are presented in table III-5.⁸

Table III-5
Ironing tables: U.S. producer's imports, 2004-09

* * * * *

U.S. EMPLOYMENT, WAGES, AND PRODUCTIVITY

HPI's employment data for ironing tables are presented in table III-6. The number of production and related workers fluctuated during the period for which data were collected but were ultimately *** percent lower in 2009 than in 2004. The hours worked per PRW also fluctuated during the same period, but ultimately were *** percent higher in 2009 than in 2004, resulting in a smaller decline in the number of hours worked. Hourly wages generally increased between 2004 and 2008 but fell to their lowest level in 2009, a year which also saw the lowest levels of employment and overall wages of the 2004-09 period. As previously noted, HPI announced in January 2008 that it would be shutting down its East Plant to transfer production to China. HPI reversed its decision shortly after, and the plant remained in operation.⁹

Table III-6
Ironing tables: U.S. producer's employment-related data, 2004-09

* * * * *

⁸ Testimony from respondent interested party at the hearing suggested that HPI has an "exclusive arrangement" with Forever Holdings for imports of ironing tables. Hearing transcript, p. 115 (Scott). In response, HPI submitted ***. HPI's posthearing brief, exhibit 2.

⁹ "<http://www.tribtown.com/news/company-6044-home-seymour.html>," retrieved April 27, 2010, and HPI's posthearing brief, exh. 2, pp. 2-4.

FINANCIAL EXPERIENCE OF THE U.S. PRODUCER

Background

The sole U.S. producer, HPI, representing all known U.S. production during the period for which data were collected in this review, provided usable financial data on its ironing table operations.^{10 11} HPI acquired its ironing table operations in 1998 when the company purchased Seymour Housewares, a leading supplier of laundry management products to the U.S. market. In 2004, Storage Acquisition LLC acquired 93 percent of HPI's outstanding shares, delisted the company from the NASDAQ exchange, and installed a new management team. In January 2006, HPI ceased filing public reports with the SEC.¹² On December 20, 2006, HPI filed for bankruptcy under Chapter 11 of the U.S. Bankruptcy Code, and on March 21, 2007, the U.S. Bankruptcy Court for the District of Delaware confirmed HPI's plan for reorganization. HPI reportedly based its decision to file for bankruptcy on a number of factors, including an increase in resin and steel prices, an inability to increase prices to cover increased costs, payments due on a \$5.6 million interest payment, and excess capacity in the marketplace.¹³ The reorganization plan eliminated \$116.1 million of interest bearing notes by exchanging that debt for 95 percent of new company stock, with the remaining new stock issued to HPI's existing shareholders.¹⁴

Operations on Ironing Tables

Income-and-loss data for HPI are presented in table III-7. HPI experienced an irregular increase in operating income from 2004 to 2007, followed by an *** in 2008 and a *** in operating income in 2009.¹⁵ Both total net sales quantity and value experienced a *** increase from 2004 to 2007, followed by declines in both net sales quantity and value in 2008. In 2009, net sales quantity experienced a further *** decline, while net sales value experienced a *** improvement. Overall, net sales quantity declined by *** percent, net sales value increased by *** percent, and operating income increased *** from 2004 to 2009.

Table III-7
Ironing tables: Results of operations of U.S. producer HPI, 2004-09

* * * * *

¹⁰ HPI's fiscal year ends on December 31. The company records underlying the financial data for HPI were examined by staff in Washington, D.C. Adjustments resulting from this examination have been incorporated in this final report. ***.

¹¹ HPI's sales of ironing tables represented *** percent of net sales revenue for its laundry management segment and *** percent of its total sales revenue for 2009. These percentages were *** and *** percent, respectively, in 2004. HPI's operating income from ironing tables *** its company-wide operating income during 2009 ***, up from representing only *** percent of total operating income in 2004. E-mail correspondence from ***, March 4, 2010.

¹² See <http://www.homzproducts.com/corporate/aboutus.aspx>. Retrieved on February 23, 2010. See also HPI's posthearing brief, p. A-20.

¹³ See <http://www.goldbergkohn.com/news-1061.html>. Retrieved on March 2, 2010. See also HPI's posthearing brief, p. A-21.

¹⁴ See <http://www.goldbergkohn.com/news-1070.html>. Retrieved on March 2, 2010. See also HPI's posthearing brief, p. A-21.

¹⁵ HPI's CEO stated that, "****." HPI's posthearing brief, exh. 2.

The per-unit net sales value generally declined from 2004 to 2007; however, the per-unit cost of goods sold (“COGS”) and selling, general, and administrative (“SG&A”) expenses generally declined by more than per-unit revenue. Thus, per-unit operating income increased irregularly from 2004 to 2007. In 2008, per-unit revenue *** while per-unit raw material costs *** increased, which resulted in *** in that year. In contrast, per-unit revenue increased in 2009 to *** level reported during the period of review while per-unit raw material costs *** declined, which resulted in *** operating income reported during the period of review on a per-unit basis, as a ratio to net sales, and in terms of absolute income.

Raw material costs accounted for approximately *** percent of total COGS during the period 2004-09, and had a considerable influence on HPI’s reported operating results. HPI reported that the cost of steel for subject ironing tables accounted for *** percent of total raw material costs between 2004 and 2009. HPI experienced a large increase in steel costs in 2008, rising from \$*** per pound in 2007 to \$*** per pound in 2008. In 2009, HPI’s steel costs declined to \$*** per pound.^{16 17}

Variance Analysis

A variance analysis for ironing tables is presented in table III-8.¹⁸ The information for the variance analysis is derived from table III-7. The analysis shows that the increase in operating income in 2009 as compared with 2004 is primarily attributable to favorable price and cost/expense variances (that is, prices increased and costs/expenses decreased in 2009 as compared with 2004).¹⁹

Table III-8
Ironing tables: Variance analysis on operations of U.S. producer HPI, 2004-09

* * * * *

Capital Expenditures and Research and Development Expenses

HPI’s reported capital expenditures and research and development (“R&D”) expenses are shown in table III-9. According to HPI, reported capital expenditures primarily reflect ***. Reported R&D expenses primarily reflect ***.²⁰

¹⁶ E-mail correspondence from ***, March 4, 2010. See HPI’s posthearing brief, pp. A-14 to A-20, for additional discussion of the firm’s operating performance during the period for which data were collected in this review.

¹⁷ HPI reported that the firm’s more recent steel purchases ***. See HPI’s U.S. producer questionnaire response, pp. 39-40.

¹⁸ A variance analysis is calculated in three parts, sales variance, cost of sales variance, and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost variance (in the case of the cost of sales and SG&A expense variance) and a volume variance. The sales or cost variance is calculated as the change in unit price times the new volume, while the volume variance is calculated as the change in volume times the old unit price. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively; and the volume variance is the sum of the volume variance lines under price and cost/expense variance.

¹⁹ The analysis also shows that from 2007 to 2008, ***. In contrast, the *** from 2008 to 2009 reflects ***.

²⁰ E-mail correspondence from ***, February 26, 2010.

Table III-9
Ironing tables: Capital expenditures and research and development expenses of U.S. producer HPI, 2004-09

* * * * *

Assets and Return on Investment

The Commission’s questionnaire requested data on assets used in the production, warehousing, and sale of ironing tables to compute return on investment (“ROI”). Data on HPI’s total assets and their ROI are presented in table III-10. HPI emerged from bankruptcy in March 2007, and accounting entries necessary to record the bankruptcy included writing down the gross value of all fixed assets to their respective net book values, and removing the associated accumulated depreciation from the books. Intangible assets were also written down as part of the bankruptcy accounting entries.²¹ Thus, the total assets for ironing tables declined from \$*** in 2004 to \$*** in 2009. The ROI irregularly increased by *** percentage points from 2004 to 2007, but then declined by *** percentage points in 2008 to *** percent before once again increasing to *** percent in 2009.

Table III-10
Ironing tables: Asset values and return on investment of U.S. producer HPI, 2004-09

* * * * *

²¹ E-mail correspondence from ***, February 25 and March 8, 2010.

PART IV: U.S. IMPORTS AND THE FOREIGN INDUSTRY

U.S. IMPORTS

Overview

The Commission issued questionnaires to 33 firms believed to have imported ironing tables between 2004 and 2009. Ten firms provided data and information in response to the questionnaires,^{1 2} while 13 firms indicated that they had not imported ironing tables during the period for which data were collected. These data are based on responses from the largest known U.S. importers and foreign producers and are believed to cover the large majority of imports from China as well as from nonsubject sources. Seven of the responding importers also provided questionnaires in the original investigation. These importers accounted for *** percent of the imports from the original investigation in 2003.³ Although the HTS subheading for ironing tables should be dedicated to metal-top, floor-standing ironing tables, there is evidence that reporting has been over-inclusive,⁴ and therefore import data in this report are based on data submitted in response to Commission questionnaires.

Imports from Subject and Nonsubject Countries

Table IV-1 presents data for U.S. imports of ironing tables from China and all other sources. Leading nonsubject sources of imports are Taiwan,⁵ Italy, India,⁶ France, and the Netherlands.⁷ In

¹ The responding firms are American Hotel Register, Bajer Design, Brabantia USA, Groupe SEB, Home Products International, Ikea, Polder, Target, Whitmor, and Whitney Design.

² Whitney Design filed for Chapter 11 bankruptcy protection in November 2009. Whitney has ceased operations. Most of Whitney Design's assets and certain liabilities were purchased by Household Essentials, LLC, with the same owners and "nearly all" of the company's 46 employees, under a bankruptcy court approved code section 363 sale order on January 29, 2010. ***, *** contends that, ***. E-mail from ***, April 15, 2010; "<http://stlouis.bizjournals.com/stlouis/stories/2009/11/30/story6.html>," retrieved April 27, 2010; and "<http://stlouis.bizjournals.com/stlouis/stories/2010/02/01/daily34.html>," retrieved April 27, 2010;

³ Ironing tables were covered by HTS statistical reporting number 9403.20.0010 under the broad heading "Metal Household Furniture" until July 1, 2003, when they were reclassified into the more specific HTS statistical reporting number 9403.20.0011, "Floor-standing metal-top ironing boards, household." The subject metal top and leg components are imported under HTS statistical reporting number 9403.90.8040. No responding company, however, reported imports of ironing table components. Customs import data also indicate that antidumping duties have not been paid on ironing table components by any of the known importers of ironing tables.

⁴ The Customs data include many seemingly large importers of ironing tables that reported that they do not import ironing tables. Eleven of the 13 companies that responded that they have not imported ironing tables are listed in Customs data as having imported at least *** units from China or from other countries.

⁵ Testimony at the hearing indicated that there were no known sources of ironing table from Taiwan. ***. Hearing transcript, p. 141, 157 (Scott); E-mail from ***, April 20, 2010.

⁶ Polder is currently importing ironing tables from India. At the hearing, Calvin Scott stated that "India is quickly becoming the new China for production of metal-topped, floor-standing ironing boards." According to an email from ***, ***. Hearing transcript, p. 117 (Scott). ***. Commerce data indicate that there were 9,044 units of ironing tables imported from India in 2009 and 8,096 units in January and February of 2010.

⁷ Of the leading nonsubject sources of imports, Taiwan, Italy, India, and the Netherlands were identified as sources of imports in the questionnaires.

addition, Mexico is a source of product entering the United States under the statistical reporting number for metal-topped, floor-standing ironing tables, but is not known to be a producer of this product.⁸

Table IV-1
Ironing tables: U.S. imports, by sources, 2004-09

Source	Calendar year					
	2004	2005	2006	2007	2008	2009
Quantity (1,000 units)						
China ¹	***	***	***	***	***	***
Other sources	***	***	***	***	***	***
Total	1,521	1,941	1,770	1,161	1,550	652
Value (1,000 dollars)²						
China	***	***	***	***	***	***
Other sources	***	***	***	***	***	***
Total	13,706	19,638	18,290	13,713	17,514	8,701
Unit value (per unit)						
China	\$***	\$***	\$***	\$***	\$***	\$***
Other sources	***	***	***	***	***	***
Total	9.01	10.12	10.33	11.81	11.30	13.35
Share of quantity (percent)						
China	***	***	***	***	***	***
Other sources	***	***	***	***	***	***
Total	100.0	100.0	100.0	100.0	100.0	100.0
Share of value (percent)						
China	***	***	***	***	***	***
Other sources	***	***	***	***	***	***
Total	100.0	100.0	100.0	100.0	100.0	100.0
<p>¹ Staff notes that total reported imports from China are lower than reported exports to the United States by Chinese producers. This has been identified as a difference between reported imports of *** and exports to *** by Chinese producer ***. However, ***'s reported imports are relatively consistent with Customs data, and are therefore considered to be more accurate.</p> <p>² Landed, duty-paid.</p>						
Source: Compiled from data submitted in response to Commission questionnaires.						

The quantity of imports from China decreased overall from 2004 to 2009, declining by *** percent. The quantity of imports from China remained well above *** units during 2004-06, but dropped noticeably in 2007, as ***'s imports from China declined from *** units in 2004-06 to just *** units in 2007. The increase in imports from China in 2008, is also attributable to ***, as its quantities of imports increased to *** units. However, in 2009 U.S. imports from China fell below *** units for the first time, reflecting a decline in imports by *** leading importers.

***'s imports also had an effect on *** imports. *** reported importing ironing tables from *** in ***; these imports accounted for *** percent of total nonsubject imports, respectively.

⁸ None of the witnesses at the hearing reported being aware of any imports of ironing tables produced in Mexico. Hearing transcript, p. 56 (Volles) and pp. 141, 158 (Scott).

U.S. IMPORTERS' INVENTORIES

Table IV-2 presents data for inventories of U.S. imports of ironing tables from China and all other sources held in the United States. *** reported holding the largest quantity of inventories from China, accounting for between *** and *** percent annually of importers' inventories during 2004-09. As ***, overall inventories ***. *** did not report holding any inventories during the period in which data were collected.

Table IV-2

Ironing tables: U.S. importers' end-of-period inventories of imports, by source, 2004-09

* * * * *

U.S. IMPORTERS' IMPORTS SUBSEQUENT TO DECEMBER 31, 2009

The Commission requested importers to indicate whether they imported or arranged for the importation of ironing tables after December 31, 2009. Four companies, ***, responded that they have current orders. *** responded that they had imported or arranged for the importation of *** ironing tables from China after December 31, 2009. *** responded that they had imported or arranged for the importation of *** and *** units, respectively, of ironing tables from *nonsubject* sources after December 31, 2009.

THE INDUSTRY IN CHINA

Overview

At the time of the Commission's original investigation, usable questionnaire responses were received from four Chinese companies. These firms were: Forever Holdings, Ltd.; Foshan City Gaoming Lihe Daily Necessities Co., Ltd.; Harvest International Housewares Ltd.; and Shunde Yongjian Housewares Co., Ltd.⁹ Collectively, the four responding producers in China reported shipments of 4.2 million ironing tables in 2003, of which, 891,000 (21 percent) were exported to the United States.

Ironing Tables Operations

In this review, the Commission sent questionnaires to 31 Chinese firms believed to produce and/or export ironing tables; six companies provided usable data. The firms that responded are Forever Holdings Ltd. ("Forever"), Foshan Shunde Yongjian Housewares & Hardware Co., Ltd. ("Foshan"), Greenwood Houseware (Zhuhai) Ltd. ("Greenwood"), Harvest International Housewares ("Harvest"), Heshan Zhishan Hengfeng Metal Co., Ltd. ("Heshan"), and Since Hardware (Guangzhou) Co. Ltd. ("Since Hardware"). During the period for which data were collected, *** were the largest producers of ironing tables in China to provide data.¹⁰ Proprietary Customs data indicate that ***. This is consistent

⁹ U.S. International Trade Commission, *Ironing Tables and Certain Parts Thereof From China, Investigation No. 731-TA-1047 (Final)*, INV-BB-087, p. VII-1.

¹⁰ The foreign producers that responded to questionnaires are largely the same as the foreign producers in the final phase of the investigation. However, Since Hardware was noted in the final phase of the original investigation as being "a large and expanding producer" but did not submit a questionnaire response. The universe of ironing table producers in China is likely much larger than those that provided data to the Commission. At exhibit 3 of the HPI's posthearing brief, a list of 40 possible manufacturers, 10 suppliers, and 3 companies with the capacity to produce

(continued...)

with the companies' respective antidumping duty margins resulting from administrative reviews by Commerce during the review period.¹¹

Data for all responding Chinese producers of ironing tables are presented in table IV-3. *** reported the production of nonsubject merchandise on the same equipment as ironing tables. Nonsubject merchandise such as *** comprised *** percent of products produced by *** and *** percent produced by *** in 2009. Capacity of the responding Chinese producers increased from 2004-8 and declined *** in 2009. *** began operations in 2007 and has increased capacity in each of the remaining years during the period for which data were collected. *** reported increasing capacity from 2004-08 and stable capacity in 2009.¹² ***'s capacity fluctuated between *** units from 2004-08, but decreased to *** units in 2009.

Table IV-3
Ironing tables: China's capacity, production, shipments, and inventories, 2004-09

Item	Calendar year					
	2004	2005	2006	2007	2008	2009
Quantity (1,000 units)						
Capacity	6,588	9,888	9,988	9,352	10,132	8,512
Production	5,658	8,795	8,813	8,010	8,209	6,022
End of period inventories	136	158	173	224	215	359
Shipments:						
Internal consumption	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***
Exports:						
United States	***	***	***	***	***	***
European Union	***	***	***	***	***	***
Asia other than China	***	***	***	***	***	***
All other markets	***	***	***	***	***	***
Total exports	***	***	***	***	***	***
Total shipments	5,569	8,773	8,798	7,958	8,218	5,877

Table continued on next page.

¹⁰ (...continued)

ironing tables is included. However, the companies exporting to the United States have been relatively constant during 2001-09.

¹¹ ***. ***'s questionnaire response, section II-7a, and proprietary Customs data.

¹² *** reported buying new machinery related to the production of ironing tables during the period for which data were collected. ***.

Table IV-3 – Continued
Ironing tables: China's capacity, production, shipments, and inventories, 2004-09

Item	Calendar year					
	2004	2005	2006	2007	2008	2009
Value (\$1,000)						
Commercial shipments: Home market	***	***	***	***	***	***
Exports to-- United States	***	***	***	***	***	***
European Union	***	***	***	***	***	***
Asia other than China	***	***	***	***	***	***
All other markets	***	***	***	***	***	***
Total exports	***	***	***	***	***	***
Total shipments	37,175	58,369	63,499	63,958	77,536	57,044
Average unit value (dollars per unit)						
Commercial shipments: Home market	***	***	***	***	***	***
Exports to-- United States	***	***	***	***	***	***
European Union	***	***	***	***	***	***
Asia other than China	***	***	***	***	***	***
All other markets	***	***	***	***	***	***
Total exports	***	***	***	***	***	***
Total shipments	6.68	6.66	7.22	8.04	9.44	9.72
Ratios and shares (percent)						
Capacity utilization	85.9	88.9	88.2	85.6	81.0	70.7
Inventories to production	2.4	1.8	2.0	2.8	2.6	6.0
Inventories to total shipments	2.4	1.8	2.0	2.8	2.6	6.1
Share of total quantity of: Internal consumption	***	***	***	***	***	***
Home market	***	***	***	***	***	***
Exports to-- United States	***	***	***	***	***	***
European Union	***	***	***	***	***	***
Asia other than China	***	***	***	***	***	***
All other markets	***	***	***	***	***	***
Total exports	***	***	***	***	***	***
<p>Note.– [Foshan and Harvest] reported all values in RMB 1,000 Yuan. Staff used oanda.com to convert these values to dollars by using the rate as of July 1st for each year. These conversion rates were \$1= 0.12104, 0.1210, 0.12530, 0.13150, 0.14610, and 0.14660 for 2004, 2005, 2006, 2007, 2008, and 2009, respectively.</p> <p>Source: Compiled from data submitted in response to Commission questionnaires.</p>						

Among the Chinese producers providing data, *** reported exporting ironing tables to the United States. Other export markets, including *** accounted for the majority of shipments during the period for which data were collected from the responding firms.

On February 4, 2006, the European Union initiated an antidumping proceeding concerning imports of ironing boards from China and Ukraine. On October 30, 2006, the European Union imposed a provisional antidumping duty on such imports, and on April 23, 2007, it imposed a definitive duty.¹³ Antidumping duties ranged from 18.1 percent (for Foshan Shunde) to 36.5 percent (for Guangzhou Power Team Houseware) for specified Chinese manufacturers and 38.1 percent for all other Chinese manufacturers, with the exception of Since Hardware (0 percent rate of duty).¹⁴ On October 2, 2009, the European Union initiated an antidumping proceeding concerning imports of ironing boards originating from Chinese exporting producer Since Hardware, a proceeding that is ongoing at this time.¹⁵ In December 2009, the European Union announced that, as a result of a judgement by the Court of Justice of the European Communities, that ruled on procedural grounds, imports of ironing boards from Chinese producer Foshan Shunde are no longer subject to the antidumping measures.¹⁶ However, the European Union has re-opened the antidumping investigation with regards to Foshan Shunde.¹⁷ Most recently, on January 19, 2010, the European Union amended the definitive antidumping duty on imports of ironing boards from China to reflect the results of a new exporter review (imposing a definitive duty of 22.7 percent on imports of ironing boards from Chinese manufacturer Greenwood Houseware (Zhuhai)).¹⁸

GLOBAL MARKET

As a practical matter, there is limited information available with respect to the subject merchandise as defined by Commerce's scope. However, some respondents to U.S. and foreign producers' questionnaires provided brief assessments regarding global markets and the market in China.¹⁹ The Official Journal of the European Union provided information about the market for ironing tables in the European Union. Also, certain inferences can be made about demand in developed-country markets based on field interviews.

Demand

The European Union is believed to be the largest non-U.S. market for ironing tables, with consumption of 8.6 million units in 2005.²⁰ The EU market, at least prior to 2007, was considered a growing market, according to Chinese producer ***. Respondents to foreign producers' questionnaires indicated that economic growth during 2004-09 increased demand for ironing tables both in China and other non-U.S. markets. One respondent stated that only a small portion of the potential market in China

¹³ Official Journal of the European Union, April 26, 2007, L109/12.

¹⁴ Ibid.

¹⁵ Official Journal of the European Union, October 2, 2009, C 237/5.

¹⁶ *Foshan Shunde Yongjian Housewares & Hardware Co. Ltd. v. Council of the European Commission, et al.*, Case No. C-141/08 P.

¹⁷ Official Journal of the European Union, December 18, 2009, C 308/44.

¹⁸ Official Journal of the European Union, January 28, 2010, L24/1.

¹⁹ Two producers of ironing tables in China offered contradictory assessments of the level of competition among producers in the Chinese domestic market, one indicating that the competition was "gentle" and the other indicating it was "big" by about 5 or 6 factories.

²⁰ *Official Journal of the European Union*, "Commission Regulation (EC) No. 1620/2006 of 30 October 2006 Imposing a Provisional Anti-dumping Duty on Imports of Ironing Boards Originating in the People's Republic of China and Ukraine," October 31, 2006, p. L 300/25.

possesses metal ironing tables. However, wooden ironing tables continue to be a viable alternative to metal top ironing tables in China.

Supply

Producers in China are the leading suppliers of ironing tables to the world market. In 2005, at least 8 producers in China exported ironing tables to the European Union (EU) (a market with approximately 30 companies producing ironing tables). One producer in the Ukraine supplied ironing tables to the EU through its affiliated company based in Switzerland in 2005.²¹ High-end ironing tables manufactured in Europe are sold to global markets. Production capacity by EU producers amounted to 8.8 million units in 2005, with actual production, however, amounting to only 3.5 million units.²²

***²³

Sources indicate that at least two companies selling ironing tables in the U.S. market have shifted some or all of their foreign sourcing of metal-top ironing tables from China to India.²⁴ One witness at the Commission's hearing testified that "factories in India offer stronger engineering, better R&D, *** produce higher quality products at prices similar to China."²⁵ That witness indicated that his company made a substantial investment to bring tooling for the manufacture of ironing tables into India,²⁶ but the costs of production in India are now similar to those in China.²⁷ The witness stated that his company imports only mesh-top, 4-leg ironing tables from India and that his company would not be able to produce T-leg models in India that would be price competitive with comparable models produced in the United States by HPI.²⁸ Respondent interested parties specifically identified four companies in India as producers of metal-top, floor-standing ironing tables, with production capacity expected to grow from *** units in 2010 to *** units in 2012.²⁹

²¹ The leading EU producers of ironing tables in 2005 were located in Italy, Poland, and the United Kingdom. Four companies accounted for 45 percent of total EU production that year. Nearly all of the EU's imports of ironing tables in 2005 came from China and Ukraine. *Official Journal of the European Union*, "Commission Regulation (EC) No. 1620/2006 of 30 October 2006 Imposing a Provisional Anti-dumping Duty on Imports of Ironing Boards Originating in the People's Republic of China and Ukraine," October 31, 2006, pp. L 300/14 and L 300/24.

²² *Official Journal of the European Union*, "Commission Regulation (EC) No. 1620/2006 of 30 October 2006 Imposing a Provisional Anti-dumping Duty on Imports of Ironing Boards Originating in the People's Republic of China and Ukraine," October 31, 2006, p. L 300/28 and 32.

²³ ***.

²⁴ Carl Scott, President, Polder Inc., and Kerry Cooper, Sales Manager, Polder Inc., testified at the Commission's hearing on April 13, 2010, that Polder had shifted all of its sourcing of metal-top ironing tables from China to India. Hearing transcript, p. 113 (Scott) and p. 118 (Cooper). Mr. Scott also testified that "India is also becoming a very attractive player in the U.S. market as an alternative to China." Hearing transcript, p. 117 (Scott). Proprietary Customs data indicate that another company in India, ***, supplies metal-top ironing tables to a second U.S. importer, ***, which had previously imported ironing tables from China. William Perry, of counsel to Polder, testified that he was told that "Ikea is moving half of its products out of China to India." Hearing transcript, p. 131 (Perry).

²⁵ Hearing transcript, p. 117 (Scott).

²⁶ Hearing transcript, p. 132 (Scott).

²⁷ Hearing transcript, p. 133 (Scott).

²⁸ Hearing transcript, p. 168 (Scott).

²⁹ The companies identified as producers in India were IEDL, Omax, Savera, and Uttam. See respondent interested parties' posthearing brief, Appendix PH-4.

Table IV-4 provides a brief description of these companies and six other potential producers identified through staff research.³⁰

Table IV-4
Ironing Tables: Companies identified as producers of metal-top, floor-standing ironing tables in India

Company name	Location	Leading products
Alok Chawla Enterprises	Faridabad, Haryana	Ironing tables, dry cleaning machines, washing machines, stain-removing machines, centrifugal separators, electrical boilers, hydro extractors
Bhatia Electricals	Mumbai, Maharashtra	Ironing tables, lamp holders, magazine racks, clothes drying racks, lighting fittings
Casa & Kuchen	Palam Vihar Gurgaon, Haryana	Ironing tables
Cipla Industries	New Delhi, Delhi	Ironing boards (both of mesh-top metal and of wood), clothes drying racks, bathroom accessories, serving trays, bathroom shelves
International Electron Devices Ltd. (IEDL)	New Delhi, Delhi	Ironing tables, components for cathode ray tubes, aperture masks for color televisions and computer monitors, customized engineered sheet metal products, motorcycle spare parts and clutch plates
Pull 'n' Dry (C-Line Industries)	Bengaluru, Karnataka	Ironing tables, hangers, and clothes drying racks
Savera	Not available	Ironing tables
Speedomax (a Unit of OMAX Autos Ltd.)	Gurgaon, Delhi	Ironing tables, sheet metal, machined and tubular components, bicycle parts, 5 th leading auto parts manufacturer in India: framed bodies, pedal & brake shoe assemblies, seat frames, and oil pump assemblies
Uttam	Not available	Ironing tables
Vinayaka Tradings	Coimbatore, Tamil Nadu	Ironing tables
Sources: IndiaMart Search and respondents' posthearing brief, Annex PH-4.		

³⁰ USITC staff sent inquiries to each of the companies identified independently of the respondents' posthearing brief as manufacturers of metal-top, floor-standing ironing tables in India to verify whether or not the companies were indeed producing ironing tables in India and whether they were exporting ironing tables to the United States or other markets. They were also asked questions regarding the size and competitiveness of the ironing table industry in India. None of the companies responded to the inquiries.

Prices

When asked to compare prices in the United States and other countries, all three responding Chinese producers reported that prices for ironing tables sold in China, the United States, and third country markets are about the same.³¹ *** In the EU market, imports in 2005 from China were sold at prices that undercut prices of EU-made ironing tables by margins ranging from 30.8 percent to 45.5 percent (imports from Ukraine undercut EU producer prices by 17.3 percent).³²

³¹ The Chinese producers reported that the prices of ironing tables sold in China, the United States, and third country markets were “no major differences,” “more or less the same,” and “no different.”

³² *Official Journal of the European Union*, “Commission Regulation (EC) No. 1620/2006 of 30 October 2006 Imposing a Provisional Anti-dumping Duty on Imports of Ironing Boards Originating in the People’s Republic of China and Ukraine,” October 31, 2006, p. L 300/27.

PART V: PRICING AND RELATED INFORMATION

FACTORS AFFECTING PRICING

U.S. prices of ironing tables can fluctuate based on demand factors such as overall U.S. economic activity and sectoral demand, particularly in housing. On the supply side, prices of ironing tables fluctuate based on the cost of the steel and due to a number of product specifications, including thickness of steel in the legs and number and type of leg styles, width and length of ironing table top, whether perforated or mesh top, and inclusion of additional features such as an iron rest and linen rack. In addition, the prices of ironing tables can fluctuate due to quantities contracted and the relative bargaining strength between purchasers and suppliers. U.S. prices of ironing tables may also be affected by prices of alternative products, including table-top ironing boards.¹

Raw Material Costs

Total raw material costs averaged almost *** percent of HPI's total costs of goods sold to produce ironing tables during 2004-09. The principal raw material input used to produce domestic ironing tables is cold-rolled steel sheet. As seen in figure V-1, HPI's quarterly purchase prices of cold-rolled steel sheet fluctuated but increased from \$*** per pound during January-March 2004 to *** per pound by July-September 2008, or by *** percent, before decreasing to *** per pound by July-September 2009 and ending at \$*** per pound during October-December 2009.² HPI indicated that it experienced *** purchase prices for its steel during 2004 and 2008, when its costs of steel on an annual basis increased by *** percent and *** percent, respectively.³

Figure V-1
Cold-rolled steel sheet: HPI's purchase prices, by quarter, 2004-09

* * * * *

*** reported that, because of market power of the larger retailers, it has been difficult ***. HPI reported that, as a result, when steel prices change, its profits ***.⁴

U.S.-Inland Transportation Costs

The U.S. producer of ironing tables, HPI, and five responding U.S. importers of ironing tables from China reported in their questionnaire responses the average U.S. freight costs to their U.S.

¹ Part II discusses in detail substitution between ironing tables and alternative products and substitution between the U.S.-produced ironing tables and imports of ironing tables from nonsubject countries.

² U.S. producer questionnaire response, section IV-24.

³ As discussed in Part III, HPI's unit raw material costs increased *** in 2004 and 2008, which correspond to increases in its steel costs during these years.

⁴ *** with this assertion is the observation that changes in HPI's reported quarterly selling prices of the three ironing table products for which it reported pricing data, shown later in Part V, were *** correlated with the quarterly movements in its reported purchase prices of steel sheet during 2004-09. The correlation coefficients between prices of the ironing table products and steel sheet ranged from *** percent for product 1 to *** percent for product 3.

customers' locations. U.S.-inland freight costs for domestic ironing tables averaged *** percent of the delivered prices,⁵ and U.S.-inland freight costs of imported ironing tables from China averaged 5.7 percent of the delivered prices. HPI and seven responding U.S. importers of ironing tables from China also reported in their questionnaire responses their U.S. shipments of the domestic and subject imported products, during 2004-09, that were shipped to U.S. customers in three specified distance categories. HPI and U.S. importers' reported weighted-average shipment shares of the domestic and subject imported ironing tables, by distance categories from their U.S. selling locations, are shown in the following tabulation.

Distance shipped	Share of U.S. shipments (percent)	
	U.S. ironing tables	Imported ironing tables from China
Within 100 miles	***	0.1
101 to 1,000 miles	***	12.1
Over 1,000 miles	***	87.9
Total	100.0	100.0

PRICING PRACTICES⁶

HPI and U.S. importers of ironing tables from China sell the majority of their products to retailers, and the remainder to distributors and commercial users, typically on a short-term basis.⁷ HPI and five importers of the ironing tables from China reported their 2009 U.S. shipments by length of sales period in their questionnaire responses. Weighted-average shares of the 2009 U.S. commercial shipment quantities of the domestically produced and subject imported ironing tables, by length of sales period, are shown in the following tabulation.

Length of sales period	Share of U.S. shipments (percent)	
	U.S. ironing tables	Imported ironing tables from China
Spot sales	***	4.6
Short-term sales	***	77.5
Long-term sales	***	17.8
Total	100.0	100.0
Note.—Figures may not add to 100 due to rounding.		

⁵ ***.

⁶ Information on pricing practices discussed in this section was based on questionnaire responses of the U.S. producer of ironing tables and importers of ironing tables from China, unless otherwise noted.

⁷ Spot sales are usually one-time delivery, within 30 days of the purchase agreement; short-term sales are for multiple deliveries for up to 12 months after the purchase agreement; and long-term sales are for multiple deliveries for more than 12 months after the purchase agreement. Short-term and long-term sales can be arranged by contracts or verbal agreements.

HPI and four U.S. importers of ironing tables from China reported the terms of their short-term contracts, while three U.S. importers reported the terms of their long-term contracts. HPI reported that (1) short-term contract periods ranged from *** months for promotions to *** months; (2) prices were generally *** during the promotional period, but *** during the ***-month contracts; (3) short-term contracts typically specified ***, and (4) short-term contracts generally *** meet or release provisions. The responding U.S. importers reported that (1) short-term contract periods ranged from 3 to 12 months and long-term contracts were 12 months with renewable provisions; (2) they were evenly split between whether prices could be renegotiated in short-term contracts, but typically indicated no renegotiations in long-term contracts; (3) short- and long-term contracts generally fixed price only; and (4) short- and long-term contracts generally had no meet or release provisions.⁸

HPI and six U.S. importers of ironing tables from China reported that they generally determined price on a combination of individual transaction basis, contracts, and price list. The U.S. producer and six of seven responding U.S. importers reported offering quantity discounts; the remaining U.S. importer reported that it did not offer quantity discounts. HPI reported selling its products primarily on *** basis. Five of six U.S. importers of the ironing tables from China reported selling their products on an f.o.b. U.S. location basis, and the remaining importer reported selling on a delivered basis. HPI reported offering payment terms of net *** days, whereas the seven responding importers reported offering payment terms of net 30-90 days.

HPI and six responding U.S. importers of the ironing tables from China reported in their questionnaire responses that their sales negotiations occurred during traditional line reviews of the customers and,⁹ except for a ***, their ironing tables were sold as separate items. *** ironing table sales by HPI and sales by one importer were “bundled” with other products.¹⁰ HPI, all nine responding U.S. importers of the ironing tables from China, and all 13 responding U.S. purchasers reported that they did not sell/purchase their ironing tables via internet auctions during 2004-09.¹¹

Line Reviews

A line review is conducted by the retailer and can occur annually or more frequently for reasons such as seasonal promotions (e.g., back-to-college demand), price increases of existing supplier(s), poor demand for current offerings of ironing table products, etc. Typical factors considered in a line review by purchasers include the following: product innovations; suggestions from suppliers to improve retail sales; supplier capabilities, ability to ship desired quantities, financial stability, management continuity, quality, ability to provide comprehensive ironing table and accessory program, and product innovations; to see new product technology; customer complaints/returns; pricing; vendor payment terms; and review of

⁸ Twelve purchasers reported in their questionnaire responses the number of times prices of ironing tables changed during 2004-09. Their responses ranged from 2 to 7 times, not frequently, annually, with fluctuations in the price of steel, and with changes in the materials and product features of the ironing table purchased.

⁹ One of these six importers, ***, is a retailer that also purchases ironing tables, and based its line review response on its imports rather than sales.

¹⁰ Bundled sales of ironing tables occur when ironing tables and other products, such as irons and other laundry items, are sold as a group under a bundled (combined) price; prices of the different items may be specified but are not independently determined.

¹¹ U.S. producer, importer, and purchaser questionnaire responses, sections IV-8, III-9, and II-7, respectively.

sales and profits for the previous period.¹² HPI and two U.S. importers, ***, also provided discussions of their line review experiences that provide additional information about price negotiations and sales strategies for ironing tables.

“***”

“***”

“***”

Importance of Product Features¹³

HPI, U.S. importers, and purchasers were requested to indicate whether mesh-top and perforated-top ironing tables were interchangeable in use; their responses are shown in the following tabulation.

Type of responding firm	Mesh-top interchangeable with perforated-top ironing tables	
	Yes	No
U.S. producer	***	***
U.S. importers	***	***
Purchasers	***	***
Total	14	9

Three of the firms indicating that the two different style tops were interchangeable also provided comments, which are the following: Most consumers are not aware of the type of table top because they are used with a cover (***) ; all purchases of *** are the mesh-top; and, despite being interchangeable, mesh tops provide better pressing than perforated tops (***) . The firms indicating that the two different style tops were not interchangeable asserted that mesh-top ironing tables provide better ventilation for heat and moisture for superior ironing results. In addition, two importers, ***, asserted that the mesh-top style enables production of rounded surface designs of the table top for better user-interface with garment items.

The responding firms were also requested to indicate the importance of any performance differences between mesh-top and perforated-top ironing tables in their sales/purchases of ironing tables during 2004-09. The firms were requested to identify any such performance differences as ‘very important’, ‘somewhat important’, or ‘not important’; their responses are shown in the tabulation below.

¹² U.S. producer, importer, and purchaser questionnaire responses, sections IV-12b, III-13b, and II-6b, respectively.

¹³ The discussion in this section is based on questionnaire responses of the U.S. producer, importers, and purchasers of ironing tables.

Type of responding firm	Importance of performance differences between mesh-top and perforated-top ironing tables		
	Very important	Somewhat important	Not important
U.S. producer	***	***	***
U.S. importers	***	***	***
Purchasers	***	***	***
Total	8	3	11

*** indicated that its perforated-top ironing tables compete head-to-head with similar mesh-top ironing tables and asserted that the most important determinant is price. On the other hand, an importer also reporting 'not important', ***, asserted that its customers would never accept a perforated-top ironing table for their assortment at price points over \$***.

HPI, U.S. importers, and purchasers were requested to indicate whether mesh-top or perforated-top ironing tables with comparable features carried a price premium vis-a-vis each other during 2004-09; their responses are shown in the following tabulation.

Type of responding firm	Price difference between mesh-top and perforated-top ironing tables		
	Mesh-top higher priced	Perforated-top higher price	No price difference
U.S. producer ¹	***	***	***
U.S. importers	***	***	***
Purchasers	***	***	***
Total	9	2	9
1 ***.			

HPI, U.S. importers, and purchasers were requested to indicate and discuss the importance of additional features (e.g. iron rests, cord holders, linen racks, etc.) attached to ironing tables in their sales/purchases of ironing tables during 2004-09. The firms were requested to identify the degree of importance as 'very important', 'somewhat important', or 'not important'; there responses are shown in the tabulation below.

Type of responding firm	Importance of additional features of ironing tables		
	Very important	Somewhat important	Not important
U.S. producer	***	***	***
U.S. importers	***	***	***
Purchasers	***	***	***
Total	7	9	7

The 16 firms reporting that additional features of ironing tables were very or somewhat important identified iron rests most frequently followed by cord minders, garment/linen racks, built-in socket for the iron, heavier pad/better quality cover for the top, extra pad and cover, fashion colors, quiet sliding mechanism, locking mechanisms on height adjustment, wheels for moving to storage, and wider tops. One or more of these features reportedly are found on the higher-end ironing tables.

Four of the seven firms reporting that additional features of ironing boards were not important provided additional comments. *** indicated that additional features were not important in its sales because about *** percent of its ironing table sales consisted of opening price-point T-leg tables, which have no additional features, and another *** percent of its sales consist of basic 4-leg ironing tables, which have no or minimal additional features. ***, an importer asserted that 90 percent of the volume of ironing table sales in the U.S. market were the basic T-leg and 4-leg tables. ***, a purchaser, reported purchasing a single basic-style ironing table with no additional features. ***, another purchaser, asserted that the most important feature for the firm was the ability to provide a coordinated ironing table and accessory program that has a matching style and packaging.

HPI, U.S. importers, and purchasers were also requested to report and discuss whether they sold/purchased high-end ironing tables and to report the number of U.S.-produced and imported Chinese high-end ironing tables that they purchased in 2009. For purposes of this question, the following description of high-end ironing tables, provided in part by HPI, was specified in the questionnaires: Floor standing, metal-top ironing tables with metal thickness of legs greater than 1.0 mm and total table weight greater than 7.5 kg and suggested retail price of \$70 or more.¹⁴ The responding firm's reported sales/purchases of the high-end ironing tables are shown in the tabulation on the following page.

¹⁴ Two responding U.S. importers disputed this definition of high-end. *** asserted that 70-75 percent of the U.S. market for steel-top ironing tables rests with suggested retail prices less than \$19.99 per table and that upper price points start at \$19.99 per table, with \$70.00 per table representing the high-end of the spectrum. *** asserted that thickness of steel and weight of the product are not relevant parameters for a definition of high-end ironing tables. The firm asserted that better parameters for high-end ironing tables should include the following: (1) a branded product; (2) at least 10 years of guaranty; (3) added features; (4) quality; and (5) service of the supplier. The firm further indicated that all of its ironing tables retail for more than \$70.00 per table, which appear to be imported from Europe.

Type of responding firm	Sales/purchases of high-end ironing tables		2009 sales/purchases (units)	
	Yes	No	U.S. -produced products	Imported products from China
U.S. producer	***	***	***	***
U.S. importers	***	***	***	***
Purchasers	***	***	*** ¹	***
Total	8	13	***	
¹ *** (staff telephone interview with ***).				

The eight firms selling/purchasing high-end ironing tables identified the features that customers find in high-end ironing tables, which included all of the additional features listed earlier that were reported by firms that found additional features ‘important’ or ‘somewhat important’. In addition, brand name was also considered a major characteristic of high-end ironing tables.

PRICE DATA

U.S. selling value and quantity data were requested from the U.S. producer of ironing tables, HPI, and U.S. importers for their U.S. sales of the following ironing table products¹⁵ produced in the United States and imported from China:¹⁶

Product 1.--Floor-standing, metal perforated-top ironing tables, T-leg, with metal thickness of legs ≤ 1.0 mm, total table weight ≤ 7.5 kg, with pad and cover, and no additional equipment.

Product 2.--Floor-standing, metal perforated-top ironing tables, T-leg, with metal thickness of legs > 1.0 mm, total table weight > 7.5 kg, with pad and cover, and no additional equipment.

¹⁵ The six ironing table products may include an iron rest and/or linen rack, but no equipment extraneous to the ironing table, such as an iron. In addition, the responding firm’s were requested to provide price data for products that competed with the specified product even if the product specifications of their product did not exactly meet the product specifications of the specified product, and to provide a description of their product.

¹⁶ HPI and Group SEB both made suggestions regarding the proposed pricing products in their comments on the draft questionnaires. HPI asserted that the two pricing products used in the final investigation were appropriate product categories, but asserted that obtaining information on 4-leg ironing tables would be difficult due to differences among these ironing tables (letter from HPI, “Comments on Draft Questions from HPI,” December 15, 2009). Group SEB suggested three product categories, specified by mesh or perforated metal tops and by weight and metal thickness, but not by number of legs (letter from Group SEB, “Comments on Draft Questionnaires,” December 15, 2009). Staff decided on the above six products by dividing the original two products into four products based on the metal thickness and total weight thresholds suggested by Group SEB, and adding two mesh-top 4-leg ironing table products differentiated by the suggested metal thickness and total weight thresholds. This approach accounts for the fact that raw materials, principally steel, comprise the *** cost in producing ironing tables.

Product 3.--Floor-standing, metal mesh-top ironing tables, T-leg, with metal thickness of legs \leq 1.0 mm, total table weight \leq 7.5 kg, with pad and cover, and no additional equipment.

Product 4.--Floor-standing, metal mesh-top ironing tables, T-leg, with metal thickness of legs $>$ 1.0 mm, total table weight $>$ 7.5 kg, with pad and cover, and no additional equipment.

Product 5.--Floor-standing, metal mesh-top ironing tables, four legs, with metal thickness of legs \leq 1.0 mm, total table weight \leq 7.5 kg, with pad and cover, and no additional equipment.

Product 6.--Floor-standing, metal mesh-top ironing tables, four legs, with metal thickness of legs $>$ 1.0 mm, total table weight $>$ 7.5 kg, with pad and cover, and no additional equipment.

HPI and U.S. importers were requested to report their quarterly net U.S. f.o.b. selling price data for their respective shipments of the specified domestic ironing tables and the imported ironing tables from China to U.S. retailers unrelated to the suppliers during 2004-09.¹⁷ In addition, retailers that imported ironing tables from China were requested to provide their quarterly import price data on a landed (c.i.f.), duty-paid, U.S. ports-of-entry basis during 2004-09.¹⁸ The selling price and import price data were requested separately for unbundled and bundled sales of ironing tables.¹⁹ Staff did not request selling price data of ironing tables by purchaser or type of purchaser or purchase prices of retailers or distributors.²⁰ As noted earlier in the report, the responding purchasers (overwhelmingly retailers) bought predominantly the domestic or imported Chinese ironing tables, such that selling price comparisons, based on prices to an individual retailer or type of retailer, could have magnified the impact of volume differences by country of origin.

HPI and five U.S. importers of ironing tables from China reported useable selling price information, but not necessarily for all periods or all products. In addition, ***, a U.S. retailer, reported import price data for their imported ironing tables from China. HPI reported total sales quantities of the U.S.-produced ironing tables for pricing purposes during 2004-09 that accounted for virtually all (***) percent of its reported U.S. commercial shipments of U.S.-produced ironing tables during this period.²¹ The responding U.S. importers reported total sales quantities for selling price purposes during 2004-09 that accounted for 56.0 percent of total reported U.S. commercial shipments of imported ironing tables from China during this period. Most of the selling price data of the domestic and imported ironing tables from China are based on unbundled sales, with only a limited quantity of bundled sales.

¹⁷ Selling price data were requested f.o.b. the U.S. producer's plant and f.o.b. U.S. ports-of-entry. Any sales from U.S. warehouses not located at the U.S. plant or ports-of-entry were to exclude from the value the U.S.-inland freight costs to the warehouses and then to the customers.

¹⁸ The import price data were to exclude any U.S. inland freight from the U.S. ports-of-entry to the retail outlets/warehouses.

¹⁹ For purposes of this review, the term "bundled" is defined as the sale/import of ironing tables with one or more other products, where the price of the ironing tables may or may not be affected by the group negotiated price. A bundled sale/import does not include the sale/import of ironing tables that includes other products for one-stop-shopping purposes and where no group price is considered.

²⁰ Purchaser records do not always track the country of origin of the purchased ironing tables. ***.

²¹ HPI's reported ironing table pricing data ***. Staff telephone interview with *** and e-mail from ***, May 5, 2010.

In addition, *** reported total import quantities for pricing purposes during 2004-09 that accounted for an additional *** percent of total reported U.S. commercial shipments of imported ironing tables from China during this period. However, after further review, the values that *** reported for its imports were ***.²² The firm reported that ***.²³ Staff notes that, based on official statistics, the charges, insurance, and freight costs for all U.S. imports of ironing tables from China averaged 18.8 percent of the customs value during 2004-09.²⁴

Total quantities of the specified six ironing table products for which HPI and U.S. importers reported their requested pricing data during 2004-09 are shown in the following tabulation.

Quantities of ironing tables (1,000 units)								
Products	Sales of U.S.-produced ironing tables			Ironing tables from China				TOTAL
	Un-bundled	Bundled	Total	Importer sales		Retailer imports	Total	
				Un-bundled	Bundled			
Product 1 ¹	***	***	***	-	-	***	***	***
Product 2 ²	***	***	***	-	-	***	***	***
Product 3 ³	***	***	***	559	185	***	***	***
Product 4 ⁴	***	***	***	1,323	-	***	***	***
Product 5 ⁵	***	***	***	2,356	66	***	***	***
Product 6 ⁶	***	***	***	387	-	***	***	***
Totals	***	***	***	4,625	251	***	***	***

¹ Product 1 is a T-leg, perforated-top ironing table with metal thickness ≤ 1.0 mm and total table weight ≤ 7.5 kg.
² Product 2 is a T-leg, perforated-top ironing table with metal thickness > 1.0 mm and total table weight > 7.5 kg.
³ Product 3 is a T-leg, mesh-top ironing table with metal thickness ≤ 1.0 mm and total table weight ≤ 7.5 kg. One of the importers, ***, reported unbundled sale price data of the Chinese product 3 for its *** ironing tables as its imported product competitive with the domestic T-leg table.
⁴ Product 4 is a T-leg, mesh-top ironing table with metal thickness > 1.0 mm and total table weight > 7.5 kg.
⁵ Product 5 is a 4-leg, mesh-top ironing table with metal thickness ≤ 1.0 mm and total table weight ≤ 7.5 kg.
⁶ Product 6 is a 4-leg, mesh-top ironing table with metal thickness > 1.0 mm and total table weight > 7.5 kg

Note.—All of the retailer import quantities for pricing purposes were unbundled.

²² E-mail from ***, March 26, 2010.

²³ ***. Ibid.

²⁴ On the other hand, Polder reported that the percentage difference between its cost price f.o.b. China and its U.S. landed cost of its imported T-leg ironing tables from China during 2004-09 averaged (simple average) *** percent and ranged from *** percent during 2009 to *** percent during 2005 (respondent interested parties' posthearing brief, appendix PH-5).

As indicated in the preceding tabulation, sales of product *** represented the largest-volume sales of the domestic ironing tables and product 5 represented the largest-volume sales of the imported ironing tables from China. Product *** represented the largest-volume of sales where the domestic ironing tables and those from China can be compared for a single product. Bundled sales of the domestic ironing tables and those imported from China were *** less than unbundled sales of these products; the reported bundled sales did not provide any direct price comparisons between the domestic ironing tables and imported ironing tables from China. Also, no price data were reported for product 2.

Price trends and price comparisons of quarterly weighted-average selling prices and the quarterly shipment quantities are based on the reported net U.S. f.o.b. selling price data. The price data for unbundled sales are shown for product 1 and products 3-6 in tables V-1 through V-5 and figures V-2 through V-6, respectively. The retailer import data for imported products 3 and 5 are also shown in tables V-2 and V-4, respectively.²⁵ Price data for bundled sales of the domestic ironing tables and imported ironing tables from China are shown in table 6,²⁶ but are not discussed further due to the relatively limited volume of such data and the uncertainty about how such prices are determined from one sale to another.²⁷ In addition, U.S. producer selling prices for products 1 and 3 combined, with selling prices of the imported product 3 from China, are shown in appendix E, table E-1; and selling prices for the imported products 3 and 4 combined from China, with the U.S. producer's selling prices for product 3, are shown in appendix E, table E-2.

Table V-1
Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic ironing table product 1 by quarters, January 2004-December 2009

* * * * *

Table V-2
Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic and imported Chinese ironing table product 3, retailer import (unbundled) prices and quantities for product 3 from China, and margins of under/(over)selling, by quarters, January 2004-December 2009

* * * * *

Table V-3
Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the imported Chinese ironing table product 4 by quarters, January 2004-December 2009

* * * * *

²⁵ As noted earlier, the values reported for these imports are ***.

²⁶ The bundled prices are shown separately because they are determined differently than the unbundled prices, which were often markedly different from the bundled prices. This difference likely occurs where prices of related products directly impacted the prices of ironing tables in bundled sales.

²⁷ The impact of other products on the price of ironing tables in a bundled sale may differ from one sale-to-another and from one supplier-to-another, such that use of this data may be limited.

Table V-4

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic and imported Chinese ironing table product 5, retailer import (unbundled) prices and quantities for product 5 from China, and margins of under/(over)selling, by quarters, January 2004-December 2009

* * * * *

Table V-5

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the imported Chinese ironing table product 6 by quarters, January 2004-December 2009

* * * * *

Table V-6

Ironing tables: Net weighted-average U.S. f.o.b. selling (bundled) prices and quantities of the domestic ironing table product 1 and the imported Chinese products 3 and 5, by quarters, January 2004-December 2009

* * * * *

Figure V-2

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic ironing table product 1, by quarters, January 2004-December 2009

* * * * *

Figure V-3

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic and imported Chinese ironing table product 3, by quarters, January 2004-December 2009

* * * * *

Figure V-4

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the imported Chinese ironing table product 4, by quarters, January 2004-December 2009

* * * * *

Figure V-5

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic and imported Chinese ironing table product 5, by quarters, January 2004-December 2009

* * * * *

Figure V-6

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the imported Chinese ironing table product 6, by quarters, January 2004-December 2009

* * * * *

Price Trends²⁸

Quarterly prices of two of the three domestic ironing table products for which prices were reported (products 1, 3, and 5) and the four ironing table products imported from China for which prices were reported (products 3-6) fluctuated but generally increased during January 2004-December 2009.²⁹ The lone exception was product 5 where prices of the domestic ironing tables decreased. Quarterly shipment quantities of the three domestic products showed more pronounced fluctuation than prices of the domestic products during January 2004-December 2009, with quantities of products 1 and 3 showing little trend during this period, but product 5 quantities generally decreasing. Quarterly shipment quantities of the imported ironing table products 3 and 5 fluctuated but showed little trend during January 2004-December 2009, while quantities of the imported product 4 generally decreased and quantities of the imported product 6 generally increased during this period.³⁰ A summary of price trends and high/low prices for the domestic and imported ironing table products from China are shown in table V-7.

Quarterly prices of the domestic ironing table products 1 and 3 generally remained above their initial period prices during January 2004-December 2009 and increased by *** percent and *** percent, respectively, during this period. On the other hand, quarterly prices of the domestic ironing table product 5 generally remained below the initial period price and decreased by *** percent during this period.

Quarterly prices of the imported products 3, 4, and 6 from China generally remained above their initial period prices during January 2004-December 2009 and increased by *** percent, *** percent, and *** percent, respectively, during this period. It should be noted that both prices and quantities of the imported product 3 fluctuated markedly during January 2004-December 2009 and reached their respective period highs during January-March 2007. Quarterly prices of the imported product 5 remained below the initial period price during 12 of the 24 quarters during January 2004-December 2009, but prices generally increased during July 2008-December 2009 to end the period *** percent above the initial period price.

The importer *** was an important source of the fluctuations in prices and quantities of the imported product 3 from China.³¹

²⁸ The reported price data for the domestic and imported ironing tables from China were dominated by one or two firms for each product. As a result, some of the price data, particularly for the imported products, may show marked quarterly fluctuations in prices and or quantities that result from changes in quantities and prices of a single dominant firm or due to relative changes quarter-to-quarter of one firm vis-a-vis the other. The latter explanation appeared to occur for prices and quantities of the imported product 3, where *** was the dominant importer.

²⁹ No price data were reported for product 2.

³⁰ Quarterly fluctuations in shipment quantities within a year may also be due to a seasonal demand pattern, where shipments to retailers peaks during the summer months due new household formations and back-to-college purchases. Changes in a particular quarter from one year to the next may also be due to cyclical demand fluctuations, especially in 2008 and 2009 compared to 2007 due to the economic recession. ***.

³¹ *** stated that ***. E-mail from ***, February 24, 2010.

Table V-7

Ironing tables: Summary of trends in quarterly weighted-average net f.o.b. selling (unbundled) prices for domestic and subject imported ironing table products 1 and 3-6, by country of origin, January 2004-December 2009

Country	Number of quarters reported	Highest price in the period (<i>per unit</i>)	Lowest price in the period (<i>per unit</i>)	Percentage change in price in the period ¹
Product 1 (perforated top, T-leg, ≤ 7.5 kg table weight)				
United States	24	\$***	\$***	***
Product 3 (mesh top, T-leg, ≤ 7.5 kg table weight)				
United States	24	***	***	***
China	24	***	***	***
Product 4 (mesh top, T-leg, > 7.5 kg table weight)				
China	24	***	***	***
Product 5 (mesh top, 4-legs, ≤ 7.5 kg table weight)				
United States	24	***	***	***
China	24	***	***	***
Product 6 (mesh top, 4-legs, > 7.5 kg table weight)				
China	24	***	***	***
¹ Price changes are from the first quarter of 2004 to the fourth quarter of 2009.				
Source: Compiled from data submitted in response to Commission questionnaires.				

Price Comparisons

A total of 48 quarterly net weighted-average U.S. f.o.b. selling price comparisons, involving unbundled sales, were possible between the domestic ironing table products 3 and 5 and those imported from China during January 2004-December 2009. Four of the 48 selling price comparisons showed that the imported products were priced less than the domestic products. Forty-three other price comparisons showed that the imported products 3 and 5 from China were priced higher than the domestic products, and the remaining single price comparison showed that the domestic and subject imported product 5 were priced the same. Such overselling may result at least partially because ***,³² The selling price comparisons are shown by period and by product in table V-8.

Table V-8

Ironing tables: Number of quarterly net weighted-average U.S. f.o.b. selling (unbundled) price comparisons between U.S. ironing tables and imported ironing tables from China, by year and by product, import quantities, and ranges of under/(over)selling, January 2004-December 2009

* * * * *

³² HPI sells close to *** percent of its ironing tables *** (U.S. producer questionnaire response, section IV-5). In addition, HPI indicated that ***; submitted separately on February 4, 2004 in response to question I-8 of the U.S. producer questionnaire).

The *** U.S. importer to report selling price data, ***, reported selling price data for Chinese product 4, a heavier more steel-intensive version of product 3;³³ selling prices of the imported product 4 were consistently lower than selling prices of the domestic product 3.³⁴ ³⁵ Combining price data for all the reported imported products 3 and 4 from China and comparing such weighted-average prices with prices of the domestic product 3 showed that the imported products were priced less than the domestic product in 9 of 24 quarters, but were priced higher in the remaining 15 quarters. These price data are shown in appendix E, table E-2.

Although not shown, *** reported quarterly prices (f.o.b. the Chinese factory) of the two ironing table products, 3 and 5, that it imported from China during 2004-09 were generally *** HPI's reported selling prices of its domestic ironing table products 3 and 5, respectively. The price differences for the 32 quarters where the prices of the Chinese products were less than prices of the domestic products ranged from *** percent to *** percent below prices of the domestic products,³⁶ whereas the price differences in the 4 quarters where the Chinese product (product 5) was priced higher than the domestic product ranged from *** percent to *** percent above prices of the domestic product.

U.S. purchasers were requested to indicate in their questionnaire responses any price changes that they observed in the U.S. market during 2004-09 between the domestic and imported ironing tables from China. Six of nine responding purchasers indicated that the price of the domestic ironing tables changed relative to the price of the imported ironing tables from China, while the remaining three responding purchasers indicated that prices of the domestic and imported ironing tables changed by the same amount. In addition, three of seven responding purchasers reported that prices of domestic ironing tables were higher than the imported ironing tables from China, whereas the remaining four purchasers reported that prices of the domestic products were lower.

U.S. purchasers were also requested to indicate in their questionnaire responses how frequently ('always', 'usually', 'sometimes', or 'never') they purchased ironing tables that were the lowest in price. Of the 11 purchasers that responded, five purchasers reported that they 'always' or 'usually' purchase ironing tables that were lowest in price, whereas the remaining six purchasers reported that they 'sometimes' or 'never' do so.³⁷

The price comparisons from the final investigation, based on the Commission's traditional approach, were based on quarterly selling price data during January 2001-March 2004 for the following

³³ ***; both of its products 3 and 4 were the specified T-leg, mesh-top, ironing tables. In response to a staff request for clarification, *** (e-mail from ***, February 22, 2010). ***.

³⁴ Although not shown, the selling prices of product 4 imported from China by *** were consistently less than selling prices of the domestic product 3 during all 24 quarters that these price data were reported and ranged from *** percent to *** percent below prices of the domestic product 3. It should be noted that based on responding purchasers, *** sold to only *** of the 13 responding purchasers. Of these *** purchasers, *** sold the domestic and imported Chinese ironing table products to ***, such that during 2009, the only period that *** reported purchases of both domestic and imported Chinese ironing tables, *** domestic ironing tables and *** imported ironing tables were purchased by this firm (it is not known what ironing table products were included in these figures).

³⁵ Household Essentials reported that HPI's selling prices of the T-leg ironing tables to Walmart were well below Whitney Design's landed costs of the T-leg ironing tables from China, and that HPI has had all of Walmart's T-leg business since 2007 (respondent interested parties' posthearing brief, appendix PH-3).

³⁶ Twenty-seven of these comparisons involved prices of the Chinese products that were at least *** percent less than prices of the domestic products.

³⁷ In addition, five purchasers identified the following non-price factors that were important in sourcing their ironing tables: product quality, service, reliability, shorter lead times, and vendor support and relationship.

single product—floor standing, metal mesh-top ironing tables, T-leg, with pad and cover. A total of 13 quarterly net weighted-average U.S. f.o.b. selling price comparisons were possible between the domestic and imported ironing table product from China during January 2001-March 2004. Nine of the 13 selling price comparisons showed that the imported product was priced less than the domestic product, by margins ranging from *** percent to *** percent. The remaining four price comparisons showed that the imported product from China was priced higher than the domestic product, by margins ranging from *** percent to *** percent.³⁸

In addition, price comparisons from the final phase of the original investigation were based on sales of the following domestic product—floor standing, metal perforated-top ironing tables, T-leg, with pad and cover and the following product imported from China—floor standing, metal mesh-top ironing tables, T-leg, with pad and cover. A total of 13 quarterly net weighted-average U.S. f.o.b. selling price comparisons were possible between these domestic and imported ironing table products from China during January 2001-March 2004. The Chinese product was priced higher than the domestic product in all 13 quarters.³⁹

³⁸ Original staff report, confidential version, Table V-2 and p. V-11.

³⁹ Original staff report, confidential version, Table V-1 and p. V-11.

APPENDIX A
***FEDERAL REGISTER* NOTICES**

DEPARTMENT OF COMMERCE**International Trade Administration****Initiation of Five-year ("Sunset") Review**

AGENCY: Import Administration, International Trade Administration, Department of Commerce.

SUMMARY: In accordance with section 751(c) of the Tariff Act of 1930, as amended ("the Act"), the Department of Commerce ("the Department") is automatically initiating a five-year review ("Sunset Review") of the antidumping duty orders listed below. The International Trade Commission ("the Commission") is publishing concurrently with this notice its notice of *Institution of Five-year Review* which covers the same orders.

EFFECTIVE DATE: July 1, 2009.

FOR FURTHER INFORMATION CONTACT: The Department official identified in the Initiation of Review section below at AD/CVD Operations, Import Administration, International Trade Administration, U.S. Department of Commerce, 14th Street & Constitution Avenue, NW, Washington, DC 20230. For information from the Commission contact Mary Messer, Office of Investigations, U.S. International Trade Commission at (202) 205-3193.

SUPPLEMENTARY INFORMATION:**Background**

The Department's procedures for the conduct of Sunset Reviews are set forth in its *Procedures for Conducting Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders*, 63 FR 13516 (March 20, 1998) and 70 FR 62061 (October 28, 2005). Guidance on methodological or analytical issues relevant to the Department's conduct of Sunset Reviews is set forth in the Department's Policy Bulletin 98.3 - *Policies Regarding the Conduct of Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders: Policy Bulletin*, 63 FR 18871 (April 16, 1998).

Initiation of Review

In accordance with 19 CFR 351.218(c), we are initiating the Sunset Review of the following antidumping duty orders:

DOC Case No.	ITC Case No.	Country	Product	Department Contact
A-570-007	731-TA-149	PRC	Barium Chloride (3rd Review)	Matthew Renkey (202) 482-2312
A-570-002	731-TA-130	PRC	Chloropicrin (3rd Review)	Matthew Renkey (202) 482-2312
A-570-888	731-TA-1047	PRC	Floor-Standing, Metal Top Ironing Tables And Parts Thereof	Dana Mermelstein (202) 482-1391
A-570-886	731-TA-1043	PRC	Polyethylene Retail Carrier Bags	Dana Mermelstein (202) 482-1391
A-557-813	731-TA-1044	Malaysia	Polyethylene Retail Carrier Bags	Dana Mermelstein (202) 482-1391
A-549-821	731-TA-1045	Thailand	Polyethylene Retail Carrier Bags	Dana Mermelstein (202) 482-1391
A-427-001	731-TA-44	France	Sorbitol (3rd Review)	Dana Mermelstein (202) 482-1391
A-475-820	731-TA-770	Italy	Stainless Steel Wire Rod (2nd Review)	Brandon Farlander (202) 482-0182
A-588-843	731-TA-771	Japan	Stainless Steel Wire Rod (2nd Review)	Brandon Farlander (202) 482-0182
A-580-829	731-TA-772	South Korea	Stainless Steel Wire Rod (2nd Review)	Brandon Farlander (202) 482-0182
A-469-807	731-TA-773	Spain	Stainless Steel Wire Rod (2nd Review)	Brandon Farlander (202) 482-0182
A-401-806	731-TA-774	Sweden	Stainless Steel Wire Rod (2nd Review)	Brandon Farlander (202) 482-0182
A-583-828	731-TA-775	Taiwan	Stainless Steel Wire Rod (2nd Review)	Brandon Farlander (202) 482-0182
A-570-887	731-TA-1046	PRC	Tetrahydrofurfuryl Alcohol	Matthew Renkey (202) 482-2312

Filing Information

As a courtesy, we are making information related to Sunset proceedings, including copies of the pertinent statute and Department's regulations, the Department schedule for Sunset Reviews, a listing of past revocations and continuations, and current service lists, available to the public on the Department's sunset Internet Web site at the following address: "<http://ia.ita.doc.gov/sunset/>." All submissions in these Sunset Reviews must be filed in accordance with the Department's regulations regarding format, translation, service, and certification of documents. These rules can be found at 19 CFR 351.303.

Pursuant to 19 CFR 351.103 (d), the Department will maintain and make available a service list for these proceedings. To facilitate the timely preparation of the service list(s), it is requested that those seeking recognition as interested parties to a proceeding contact the Department in writing within 10 days of the publication of the Notice of Initiation.

Because deadlines in Sunset Reviews can be very short, we urge interested parties to apply for access to proprietary information under administrative protective order ("APO") immediately following publication in the **Federal Register** of this notice of initiation by filing a notice of intent to participate. The Department's regulations on submission of proprietary information and eligibility to receive access to business proprietary information under APO can be found at 19 CFR 351.304-306.

Information Required from Interested Parties

Domestic interested parties defined in section 771(9)(C), (D), (E), (F), and (G) of the Act and 19 CFR 351.102(b)) wishing to participate in a Sunset Review must respond not later than 15 days after the

date of publication in the **Federal Register** of this notice of initiation by filing a notice of intent to participate. The required contents of the notice of intent to participate are set forth at 19 CFR 351.218(d)(1)(ii). In accordance with the Department's regulations, if we do not receive a notice of intent to participate from at least one domestic interested party by the 15-day deadline, the Department will automatically revoke the order without further review. See 19 CFR 351.218(d)(1)(iii).

If we receive an order-specific notice of intent to participate from a domestic interested party, the Department's regulations provide that *all parties* wishing to participate in the Sunset Review must file complete substantive responses not later than 30 days after the date of publication in the **Federal Register** of this notice of initiation. The required contents of a substantive response, on an order-specific basis, are set forth at 19 CFR 351.218(d)(3). Note that certain information requirements differ for respondent and domestic parties. Also, note that the Department's information requirements are distinct from the Commission's information requirements.¹ Please consult the Department's regulations for information regarding the Department's conduct of Sunset Reviews. Please consult the Department's regulations at 19 CFR Part 351 for definitions of terms and for other general information concerning antidumping and countervailing duty proceedings at the Department.

This notice of initiation is being published in accordance with section

751(c) of the Act and 19 CFR 351.218 (c).

June 23, 2009.

John M. Andersen,

Acting Deputy Assistant Secretary for Antidumping and Countervailing Duty Operations.

[FR Doc. E9-15570 Filed 6-30-04; 8:45 am]

BILLING CODE 3510-DS-S

¹ In comments made on the interim final sunset regulations, a number of parties stated that the proposed five-day period for rebuttals to substantive responses to a notice of initiation was insufficient. This requirement was retained in the final sunset regulations at 19 CFR 351.218(d)(4). As provided in 19 CFR 351.302(b), however, the Department will consider individual requests to extend that five-day deadline based upon a showing of good cause.

Act of 1930 (19 U.S.C. 1675(c)) (the Act) to determine whether revocation of the antidumping duty order on ironing tables from China, would be likely to lead to continuation or recurrence of material injury. Pursuant to section 751(c)(2) of the Act, interested parties are requested to respond to this notice by submitting the information specified below to the Commission;¹ to be assured of consideration, the deadline for responses is July 31, 2009. Comments on the adequacy of responses may be filed with the Commission by September 15, 2009. For further information concerning the conduct of this review and rules of general application, consult the Commission's Rules of Practice and Procedure, part 201, subparts A through E (19 CFR part 201), and part 207, subparts A, D, E, and F (19 CFR part 207).

DATES: *Effective Date:* July 1, 2009.

FOR FURTHER INFORMATION CONTACT:

Mary Messer (202-205-3193), Office of Investigations, U.S. International Trade Commission, 500 E Street SW., Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission's TDD terminal on 202-205-1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202-205-2000. General information concerning the Commission may also be obtained by accessing its internet server (<http://www.usitc.gov>). The public record for this review may be viewed on the Commission's electronic docket (EDIS) at <http://edis.usitc.gov>.

SUPPLEMENTARY INFORMATION:

Background. On August 6, 2004, the Department of Commerce issued an antidumping duty order on imports of ironing tables from China (69 FR 47868). The Commission is conducting a review to determine whether revocation of the order would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. It will assess the adequacy of interested party responses to this notice of institution to determine whether to conduct a full review or an expedited review. The

Commission's determination in any expedited review will be based on the facts available, which may include information provided in response to this notice.

Definitions. The following definitions apply to this review:

(1) *Subject Merchandise* is the class or kind of merchandise that is within the scope of the five-year review, as defined by the Department of Commerce.

(2) The *Subject Country* in this review is China.

(3) The *Domestic Like Product* is the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the *Subject Merchandise*. In its original determination, the Commission found one *Domestic Like Product* consisting of floor-standing, metal-top ironing tables, coexistent with the scope.

(4) The *Domestic Industry* is the U.S. producers as a whole of the *Domestic Like Product*, or those producers whose collective output of the *Domestic Like Product* constitutes a major proportion of the total domestic production of the product. In its original determination, the Commission defined the *Domestic Industry* as U.S. producers of the *Domestic Like Product*.

(5) The *Order Date* is the date that the antidumping duty order under review became effective. In this review, the *Order Date* is August 6, 2004.

(6) An *Importer* is any person or firm engaged, either directly or through a parent company or subsidiary, in importing the *Subject Merchandise* into the United States from a foreign manufacturer or through its selling agent.

Participation in the review and public service list. Persons, including industrial users of the *Subject Merchandise* and, if the merchandise is sold at the retail level, representative consumer organizations, wishing to participate in the review as parties must file an entry of appearance with the Secretary to the Commission, as provided in section 201.11(b)(4) of the Commission's rules, no later than 21 days after publication of this notice in the **Federal Register**. The Secretary will maintain a public service list containing the names and addresses of all persons, or their representatives, who are parties to the review.

Former Commission employees who are seeking to appear in Commission five-year reviews are advised that they may appear in a review even if they participated personally and substantially in the corresponding underlying original investigation. The Commission's designated agency ethics

INTERNATIONAL TRADE COMMISSION

[Investigation No. 731-TA-1047 (Review)]

Ironing Tables From China

AGENCY: United States International Trade Commission.

ACTION: Institution of a five-year review concerning the antidumping duty order on ironing tables from China.

SUMMARY: The Commission hereby gives notice that it has instituted a review pursuant to section 751(c) of the Tariff

¹ No response to this request for information is required if a currently valid Office of Management and Budget (OMB) number is not displayed; the OMB number is 3117-0016/USITC No. 09-5-197, expiration date June 30, 2011. Public reporting burden for the request is estimated to average 15 hours per response. Please send comments regarding the accuracy of this burden estimate to the Office of Investigations, U.S. International Trade Commission, 500 E Street, SW., Washington, DC 20436.

official recently has advised that a five-year review is no longer considered the "same particular matter" as the corresponding underlying original investigation for purposes of 18 U.S.C. 207, the post employment statute for Federal employees, and Commission rule 201.15(b) (19 CFR 201.15(b)), 73 FR 24609 (May 5, 2008). This advice was developed in consultation with the Office of Government Ethics. Consequently, former employees are no longer required to seek Commission approval to appear in a review under Commission rule 19 CFR 201.15, even if the corresponding underlying original investigation was pending when they were Commission employees. For further ethics advice on this matter, contact Carol McCue Verratti, Deputy Agency Ethics Official, at 202-205-3088.

Limited disclosure of business proprietary information (BPI) under an administrative protective order (APO) and APO service list. Pursuant to section 207.7(a) of the Commission's rules, the Secretary will make BPI submitted in this review available to authorized applicants under the APO issued in the review, provided that the application is made no later than 21 days after publication of this notice in the **Federal Register**. Authorized applicants must represent interested parties, as defined in 19 U.S.C. 1677(9), who are parties to the review. A separate service list will be maintained by the Secretary for those parties authorized to receive BPI under the APO.

Certification. Pursuant to section 207.3 of the Commission's rules, any person submitting information to the Commission in connection with this review must certify that the information is accurate and complete to the best of the submitter's knowledge. In making the certification, the submitter will be deemed to consent, unless otherwise specified, for the Commission, its employees, and contract personnel to use the information provided in any other reviews or investigations of the same or comparable products which the Commission conducts under Title VII of the Act, or in internal audits and investigations relating to the programs and operations of the Commission pursuant to 5 U.S.C. Appendix 3.

Written submissions. Pursuant to section 207.61 of the Commission's rules, each interested party response to this notice must provide the information specified below. The deadline for filing such responses is July 31, 2009, pursuant to section 207.62(b) of the Commission's rules, eligible parties (as specified in Commission rule

207.62(b)(1)) may also file comments concerning the adequacy of responses to the notice of institution and whether the Commission should conduct an expedited or full review. The deadline for filing such comments is September 15, 2009. All written submissions must conform with the provisions of sections 201.8 and 207.3 of the Commission's rules and any submissions that contain BPI must also conform with the requirements of sections 201.6 and 207.7 of the Commission's rules. The Commission's rules do not authorize filing of submissions with the Secretary by facsimile or electronic means, except to the extent permitted by section 201.8 of the Commission's rules, as amended, 67 FR 68036 (November 8, 2002). Also, in accordance with sections 201.16(c) and 207.3 of the Commission's rules, each document filed by a party to the review must be served on all other parties to the review (as identified by either the public or APO service list as appropriate), and a certificate of service must accompany the document (if you are not a party to the review you do not need to serve your response).

Inability to provide requested information. Pursuant to section 207.61(c) of the Commission's rules, any interested party that cannot furnish the information requested by this notice in the requested form and manner shall notify the Commission at the earliest possible time, provide a full explanation of why it cannot provide the requested information, and indicate alternative forms in which it can provide equivalent information. If an interested party does not provide this notification (or the Commission finds the explanation provided in the notification inadequate) and fails to provide a complete response to this notice, the Commission may take an adverse inference against the party pursuant to section 776(b) of the Act in making its determination in the review.

Information to be Provided in Response to this Notice of Institution: As used below, the term "firm" includes any related firms.

(1) The name and address of your firm or entity (including World Wide Web address if available) and name, telephone number, fax number, and E-mail address of the certifying official.

(2) A statement indicating whether your firm/entity is a U.S. producer of the *Domestic Like Product*, a U.S. union or worker group, a U.S. importer of the *Subject Merchandise*, a foreign producer or exporter of the *Subject Merchandise*, a U.S. or foreign trade or business association, or another interested party (including an explanation). If you are a union/worker group or trade/business

association, identify the firms in which your workers are employed or which are members of your association.

(3) A statement indicating whether your firm/entity is willing to participate in this review by providing information requested by the Commission.

(4) A statement of the likely effects of the revocation of the antidumping duty order on the *Domestic Industry* in general and/or your firm/entity specifically. In your response, please discuss the various factors specified in section 752(a) of the Act (19 U.S.C. 1675a(a)) including the likely volume of subject imports, likely price effects of subject imports, and likely impact of imports of *Subject Merchandise* on the *Domestic Industry*.

(5) A list of all known and currently operating U.S. producers of the *Domestic Like Product*. Identify any known related parties and the nature of the relationship as defined in section 771(4)(B) of the Act (19 U.S.C. 1677(4)(B)).

(6) A list of all known and currently operating U.S. importers of the *Subject Merchandise* and producers of the *Subject Merchandise* in the *Subject Country* that currently export or have exported *Subject Merchandise* to the United States or other countries since the *Order Date*.

(7) A list of 3-5 leading purchasers in the U.S. market for the *Domestic Like Product* and the *Subject Merchandise* (including street address, World Wide Web address, and the name, telephone number, fax number, and E-mail address of a responsible official at each firm).

(8) A list of known sources of information on national or regional prices for the *Domestic Like Product* or the *Subject Merchandise* in the U.S. or other markets.

(9) If you are a U.S. producer of the *Domestic Like Product*, provide the following information on your firm's operations on that product during calendar year 2008, except as noted (report quantity data in number of tables and value data in U.S. dollars, f.o.b. plant). If you are a union/worker group or trade/business association, provide the information, on an aggregate basis, for the firms in which your workers are employed/which are members of your association.

(a) Production (quantity) and, if known, an estimate of the percentage of total U.S. production of the *Domestic Like Product* accounted for by your firm's(s') production;

(b) Capacity (quantity) of your firm to produce the *Domestic Like Product* (i.e., the level of production that your establishment(s) could reasonably have expected to attain during the year,

assuming normal operating conditions (using equipment and machinery in place and ready to operate), normal operating levels (hours per week/weeks per year), time for downtime, maintenance, repair, and cleanup, and a typical or representative product mix);

(c) The quantity and value of U.S. commercial shipments of the *Domestic Like Product* produced in your U.S. plant(s); and

(d) The quantity and value of U.S. internal consumption/company transfers of the *Domestic Like Product* produced in your U.S. plant(s).

(e) The value of (i) net sales, (ii) cost of goods sold (COGS), (iii) gross profit, (iv) selling, general and administrative (SG&A) expenses, and (v) operating income of the *Domestic Like Product* produced in your U.S. plant(s) (include both U.S. and export commercial sales, internal consumption, and company transfers) for your most recently completed fiscal year (identify the date on which your fiscal year ends).

(10) If you are a U.S. importer or a trade/business association of U.S. importers of the *Subject Merchandise* from the *Subject Country*, provide the following information on your firm's(s') operations on that product during calendar year 2008 (report quantity data in number of tables and value data in U.S. dollars). If you are a trade/business association, provide the information, on an aggregate basis, for the firms which are members of your association.

(a) The quantity and value (landed, duty-paid but not including antidumping duties) of U.S. imports and, if known, an estimate of the percentage of total U.S. imports of *Subject Merchandise* from the *Subject Country* accounted for by your firm's(s') imports;

(b) The quantity and value (f.o.b. U.S. port, including antidumping duties) of U.S. commercial shipments of *Subject Merchandise* imported from the *Subject Country*; and

(c) The quantity and value (f.o.b. U.S. port, including antidumping duties) of U.S. internal consumption/company transfers of *Subject Merchandise* imported from the *Subject Country*.

(11) If you are a producer, an exporter, or a trade/business association of producers or exporters of the *Subject Merchandise* in the *Subject Country*, provide the following information on your firm's(s') operations on that product during calendar year 2008 (report quantity data in number of tables and value data in U.S. dollars, landed and duty-paid at the U.S. port but not including antidumping duties). If you are a trade/business association, provide the information, on an aggregate basis,

for the firms which are members of your association.

(a) Production (quantity) and, if known, an estimate of the percentage of total production of *Subject Merchandise* in the *Subject Country* accounted for by your firm's(s') production; and

(b) Capacity (quantity) of your firm to produce the *Subject Merchandise* in the *Subject Country* (i.e., the level of production that your establishment(s) could reasonably have expected to attain during the year, assuming normal operating conditions (using equipment and machinery in place and ready to operate), normal operating levels (hours per week/weeks per year), time for downtime, maintenance, repair, and cleanup, and a typical or representative product mix); and

(c) The quantity and value of your firm's(s') exports to the United States of *Subject Merchandise* and, if known, an estimate of the percentage of total exports to the United States of *Subject Merchandise* from the *Subject Country* accounted for by your firm's(s') exports.

(12) Identify significant changes, if any, in the supply and demand conditions or business cycle for the *Domestic Like Product* that have occurred in the United States or in the market for the *Subject Merchandise* in the *Subject Country* since the *Order Date*, and significant changes, if any, that are likely to occur within a reasonably foreseeable time. Supply conditions to consider include technology; production methods; development efforts; ability to increase production (including the shift of production facilities used for other products and the use, cost, or availability of major inputs into production); and factors related to the ability to shift supply among different national markets (including barriers to importation in foreign markets or changes in market demand abroad). Demand conditions to consider include end uses and applications; the existence and availability of substitute products; and the level of competition among the *Domestic Like Product* produced in the United States, *Subject Merchandise* produced in the *Subject Country*, and such merchandise from other countries.

(13) (OPTIONAL) A statement of whether you agree with the above definitions of the *Domestic Like Product* and *Domestic Industry*; if you disagree with either or both of these definitions, please explain why and provide alternative definitions.

Authority: This review is being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to section 207.61 of the Commission's rules.

By order of the Commission.

Marilyn R. Abbott,

Secretary.

Issued: June 29, 2009.

William R. Bishop,

Acting Secretary to the Commission.

[FR Doc. E9-15646 Filed 7-1-09; 8:45 am]

BILLING CODE P

¹ No response to this request for information is required if a currently valid Office of Management and Budget (OMB) number is not displayed; the OMB number is 3117-0016/USITC No. 09-5-195, expiration date June 30, 2011. Public reporting burden for the request is estimated to average 15 hours per response. Please send comments regarding the accuracy of this burden estimate to the Office of Investigations, U.S. International Trade Commission, 500 E Street, SW., Washington, DC 20436.

**INTERNATIONAL TRADE
COMMISSION**

[Investigation No. 731-TA-1047 (Review)]

Ironing Tables From China

AGENCY: United States International Trade Commission.

ACTION: Notice of Commission determination to conduct a full five-year

By order of the Commission.

Marilyn R. Abbott,

Secretary to the Commission.

[FR Doc. E9-25247 Filed 10-20-09; 8:45 am]

BILLING CODE 7020-02-P

SUMMARY: The Commission hereby gives notice that it will proceed with a full review pursuant to section 751(c)(5) of the Tariff Act of 1930 (19 U.S.C. 1675(c)(5)) to determine whether revocation of the antidumping duty order on ironing tables from China would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. A schedule for the review will be established and announced at a later date. For further information concerning the conduct of this review and rules of general application, consult the Commission's Rules of Practice and Procedure, part 201, subparts A through E (19 CFR part 201), and part 207, subparts A, D, E, and F (19 CFR part 207).

DATES: *Effective Date:* October 5, 2009.

FOR FURTHER INFORMATION CONTACT:

Mary Messer (202-205-3193), Office of Investigations, U.S. International Trade Commission, 500 E Street, SW., Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission's TDD terminal on 202-205-1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202-205-2000. General information concerning the Commission may also be obtained by accessing its Internet server (<http://www.usitc.gov>). The public record for this review may be viewed on the Commission's electronic docket (EDIS) at <http://edis.usitc.gov>.

SUPPLEMENTARY INFORMATION: On

October 5, 2009, the Commission determined that it should proceed to a full review in the subject five-year review pursuant to section 751(c)(5) of the Act. The Commission found that both the domestic and respondent interested party group responses to its notice of institution (74 FR 31755, July 2, 2009) were adequate. A record of the Commissioners' votes, the Commission's statement on adequacy, and any individual Commissioner's statements will be available from the Office of the Secretary and at the Commission's Web site.

Authority: This review is being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to section 207.62 of the Commission's rules.

Issued: October 14, 2009.

SUPPLEMENTARY INFORMATION:**Background**

On July 1, 2009, the Department initiated a sunset review of the antidumping duty order on ironing tables from the PRC pursuant to section 751(c) of the Act. *See Initiation of Five-year (Sunset) Reviews*, 74 FR 31412 (July 1, 2009). The Department received a notice of intent to participate from one domestic interested party, Home Products International (HPI), within the deadline specified in 19 CFR 351.218(d)(1)(i) of the Department's regulations. HPI claimed interested party status under section 771(9)(C) of the Act as a domestic producer of the domestic like product. We received a complete substantive response from HPI within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i).

The Department also received a substantive response from one respondent party, Since Hardware (Guangzhou) Co., Ltd. (Since Hardware) within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i). On August 5, 2009 HPI submitted rebuttal comments to Since Hardware's substantive response. On August 19, 2009 the Department determined Since Hardware's substantive response to be inadequate because it failed to meet certain requirements in 19 CFR 351.218(c)(1)(ii)(A) and (d)(3)(iii)(E). For a more detailed discussion of the Department's determination regarding Since Hardware's substantive response, please see the Memorandum to the File, "Adequacy Determination of Respondent's Substantive Comments: Sunset Review of the Antidumping Duty Order on Floor-Standing Metal-Top Ironing Tables and Parts Thereof from the People's Republic of China (PRC)" dated August 19, 2009. As a result of the foregoing, the Department conducted an expedited (120-day) sunset review of this order pursuant to section 751(C)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(c)(2).

Scope of the Order

For purposes of the order, the product covered consists of floor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with

DEPARTMENT OF COMMERCE**International Trade Administration**

[A-570-888]

Floor-Standing Metal-Top Ironing Tables and Parts Thereof from the People's Republic of China: Final Results of Expedited Five-year (Sunset) Review of Antidumping Duty Order

AGENCY: Import Administration, International Trade Administration, Department of Commerce.

SUMMARY: On July 1, 2009, the Department of Commerce (the Department) initiated a sunset review of the antidumping duty order on floor-standing metal-top ironing tables and parts thereof (ironing tables) from the People's Republic of China (the PRC) pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act). The Department conducted an expedited (120-day) sunset review of this antidumping duty order. As a result of this sunset review, the Department finds that revocation of the antidumping duty order would be likely to lead to continuation or recurrence of dumping at the levels identified below in the "Final Results of Review" section of this notice.

EFFECTIVE DATE: November 3, 2009.

FOR FURTHER INFORMATION: David Cordell, AD/CVD Operations, Office 7, or Dana Mermelstein, AD/CVD Operations, Office 6, Import Administration, International Trade Administration, U.S. Department of Commerce, 14th Street and Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-0408, or (202) 482-1391, respectively.

various features, including iron rests, linen racks, and others. The subject ironing tables may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this order.

Furthermore, the order specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. For purposes of this order, the term "unassembled" ironing table means a product requiring the attachment of the leg assembly to the top or the attachment of an included feature such as an iron rest or linen rack. The term "complete" ironing table means a product sold as a ready-to-use ensemble consisting of the metal-top table and a pad and cover, with or without additional features, *e.g.*, iron rest or linen rack. The term "incomplete" ironing table means product shipped or sold as a "bare board" *i.e.*, a metal-top table only, without the pad and cover, with or without additional features, *e.g.*, iron rest or linen rack. The major parts or components of ironing tables that are intended to be covered by the order under the term "certain parts thereof" consist of the metal top component (with or without assembled supports and slides) and/or the leg components, whether or not attached together as a leg assembly. This order covers separately shipped metal top components and leg components, without regard to whether the respective quantities would yield an exact quantity of assembled ironing tables.

Ironing tables without legs (such as models that mount on walls or over doors) are not floor-standing and are specifically excluded. Additionally, tabletop or countertop models with short legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded.

The subject ironing tables are currently classifiable under HTSUS subheading 9403.20.0011. The subject metal top and leg components are classified under HTSUS subheading 9403.90.8040. Although the HTS subheadings are provided for convenience and Customs purposes, the written description of the scope remains dispositive.

Analysis of Comments Received

All issues raised in this case are addressed in the "Issues and Decision Memorandum" from Richard Weible, Director Office 7 to John M. Andersen, Acting Deputy Assistant Secretary for AD/CVD Operations, Import Administration, dated October 27, 2009

(Decision Memorandum), which is hereby adopted by this notice. The issues discussed in the Decision Memorandum include the likelihood of continuation or recurrence of dumping and the magnitude of the margin likely to prevail if the order was revoked. Parties can find a complete discussion of all issues raised in this sunset review and the corresponding recommendations in this public memorandum, which is on file in room 1117 of the main Commerce building. In addition, a complete version of the Decision Memorandum can be accessed directly on the Internet at <http://ia.ita.doc.gov/frn/>. The paper copy and electronic version of the Decision Memorandum are identical in content.

Final Results of Sunset Reviews

We determine that revocation of the antidumping duty order on ironing tables from the PRC would likely lead to continuation or recurrence of dumping at the following percentage weighted-average margins:

Manufacturers/Exporters/Producers	Weighted-Average Margin (Percent)
Since Hardware	9.47 percent
Shunde Yongjian	157.68 percent
Forever Holdings	72.29 percent
Gaoming	72.29 percent
Harvest	72.29 percent
Foshan Shunde	157.68 percent
PRC-Wide Rate	157.68 percent

This notice serves as the only reminder to parties subject to administrative protective orders (APO) of their responsibility concerning the return or destruction of proprietary information disclosed under APO in accordance with 19 CFR 351.305. Timely notification of the return or destruction of APO materials or conversion to judicial protective order is hereby requested. Failure to comply with the regulations and terms of an APO is a violation which is subject to sanction.

We are issuing and publishing these results and this notice in accordance with sections 751(c), 752(c), and 777(i)(1) of the Act.

Dated: October 27, 2009.

John M. Andersen,

Acting Deputy Assistant Secretary for Antidumping and Countervailing Duty Operations.

[FR Doc. E9-26426 Filed 11-2-09; 8:45 am]

BILLING CODE 3510-DS-S

**INTERNATIONAL TRADE
COMMISSION**

[Investigation No. 731-TA-1047 (Review)]

Ironing Tables From China

AGENCY: United States International Trade Commission.

ACTION: Scheduling of a full five-year review concerning the antidumping duty order on ironing tables from China.

SUMMARY: The Commission hereby gives notice of the scheduling of a full review pursuant to section 751(c)(5) of the Tariff Act of 1930 (19 U.S.C. 1675(c)(5)) (the Act) to determine whether revocation of the antidumping duty order on ironing tables from China would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. For

further information concerning the conduct of this review and rules of general application, consult the Commission's Rules of Practice and Procedure, part 201, subparts A through E (19 CFR part 201), and part 207, subparts A, D, E, and F (19 CFR part 207).

DATES: *Effective Date:* November 16, 2009.

FOR FURTHER INFORMATION CONTACT:

Jennifer Merrill (202–205–3188), Office of Investigations, U.S. International Trade Commission, 500 E Street SW., Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission's TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202–205–2000. General information concerning the Commission may also be obtained by accessing its Internet server (<http://www.usitc.gov>). The public record for this review may be viewed on the Commission's electronic docket (EDIS) at <http://edis.usitc.gov>.

SUPPLEMENTARY INFORMATION:

Background.—On October 5, 2009, the Commission determined that responses to its notice of institution of the subject five-year review were such that a full review pursuant to section 751(c)(5) of the Act should proceed (74 FR 54066, October 21, 2009). A record of the Commissioners' votes, the Commission's statement on adequacy, and any individual Commissioner's statements are available from the Office of the Secretary and at the Commission's Web site.

Participation in the review and public service list.—Persons, including industrial users of the subject merchandise and, if the merchandise is sold at the retail level, representative consumer organizations, wishing to participate in this review as parties must file an entry of appearance with the Secretary to the Commission, as provided in section 201.11 of the Commission's rules, by 45 days after publication of this notice. A party that filed a notice of appearance following publication of the Commission's notice of institution of the review need not file an additional notice of appearance. The Secretary will maintain a public service list containing the names and addresses of all persons, or their representatives, who are parties to the review.

Limited disclosure of business proprietary information (BPI) under an administrative protective order (APO) and BPI service list.—Pursuant to

section 207.7(a) of the Commission's rules, the Secretary will make BPI gathered in this review available to authorized applicants under the APO issued in the review, provided that the application is made by 45 days after publication of this notice. Authorized applicants must represent interested parties, as defined by 19 U.S.C. 1677(9), who are parties to the review. A party granted access to BPI following publication of the Commission's notice of institution of the review need not reapply for such access. A separate service list will be maintained by the Secretary for those parties authorized to receive BPI under the APO.

Staff report.—The prehearing staff report in the review will be placed in the nonpublic record on March 24, 2010, and a public version will be issued thereafter, pursuant to section 207.64 of the Commission's rules.

Hearing.—The Commission will hold a hearing in connection with the review beginning at 9:30 a.m. on April 13, 2010, at the U.S. International Trade Commission Building. Requests to appear at the hearing should be filed in writing with the Secretary to the Commission on or before April 8, 2010. A nonparty who has testimony that may aid the Commission's deliberations may request permission to present a short statement at the hearing. All parties and nonparties desiring to appear at the hearing and make oral presentations should attend a prehearing conference to be held at 9:30 a.m. on April 12, 2010, at the U.S. International Trade Commission Building. Oral testimony and written materials to be submitted at the public hearing are governed by sections 201.6(b)(2), 201.13(f), 207.24, and 207.66 of the Commission's rules. Parties must submit any request to present a portion of their hearing testimony *in camera* no later than 7 business days prior to the date of the hearing.

Written submissions.—Each party to the review may submit a prehearing brief to the Commission. Prehearing briefs must conform with the provisions of section 207.65 of the Commission's rules; the deadline for filing is April 2, 2010. Parties may also file written testimony in connection with their presentation at the hearing, as provided in section 207.24 of the Commission's rules, and posthearing briefs, which must conform with the provisions of section 207.67 of the Commission's rules. The deadline for filing posthearing briefs is April 22, 2010; witness testimony must be filed no later than three days before the hearing. In addition, any person who has not entered an appearance as a party to the

review may submit a written statement of information pertinent to the subject of the review on or before April 22, 2010. On May 13, 2010, the Commission will make available to parties all information on which they have not had an opportunity to comment. Parties may submit final comments on this information on or before May 17, 2010, but such final comments must not contain new factual information and must otherwise comply with section 207.68 of the Commission's rules. All written submissions must conform with the provisions of section 201.8 of the Commission's rules; any submissions that contain BPI must also conform with the requirements of sections 201.6, 207.3, and 207.7 of the Commission's rules. The Commission's rules do not authorize filing of submissions with the Secretary by facsimile or electronic means, except to the extent permitted by section 201.8 of the Commission's rules, as amended, 67 FR 68036 (November 8, 2002). Even where electronic filing of a document is permitted, certain documents must also be filed in paper form, as specified in II (C) of the Commission's Handbook on Electronic Filing Procedures, 67 FR 68168, 68173 (November 8, 2002).

Additional written submissions to the Commission, including requests pursuant to section 201.12 of the Commission's rules, shall not be accepted unless good cause is shown for accepting such submissions, or unless the submission is pursuant to a specific request by a Commissioner or Commission staff.

In accordance with sections 201.16(c) and 207.3 of the Commission's rules, each document filed by a party to the review must be served on all other parties to the review (as identified by either the public or BPI service list), and a certificate of service must be timely filed. The Secretary will not accept a document for filing without a certificate of service.

Authority: This review is being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to section 207.62 of the Commission's rules.

By order of the Commission.

Issued: November 24, 2009.

William R. Bishop,

Acting Secretary to the Commission.

[FR Doc. E9–28547 Filed 11–27–09; 8:45 am]

BILLING CODE P

EXPLANATION OF COMMISSION DETERMINATION ON ADEQUACY

in

Ironing Tables from China
Inv. No. 731-TA-1047 (Review)

On October 5, 2009, the Commission determined that it should proceed to a full review in the subject five-year review pursuant to section 751(c)(3)(B) of the Tariff Act of 1930, as amended, 19 U.S.C. § 1675(c)(5).

The Commission determined that the response to its notice of institution filed by Home Products International, Inc., the sole domestic producer of ironing tables and the petitioner in the original investigation, was individually adequate. The Commission further determined that the domestic interested party group response was adequate.

The Commission also determined that the responses to its notice of institution filed by Group SEB USA, Inc., Polder Inc. and Whitney Design, U.S. importers of the subject merchandise, were individually adequate. The Commission determined that the response to its notice of institution filed by Since Hardware (Guangzhou) Co., Ltd., a Chinese manufacturer and exporter to the United States of ironing tables, was individually adequate. Because the responding U.S. importers accounted for a majority of imports of subject ironing tables in 2008, and a foreign producer also responded, the Commission further determined that the respondent interested party group response was adequate. Accordingly, the Commission determined to proceed to a full review in *Ironing Tables from China*.

A record of the Commissioners' votes is available from the Office of the Secretary and the Commission's web site (<http://www.usitc.gov>).

APPENDIX B
HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses at the United States International Trade Commission's hearing:

Subject: Ironing Tables and Certain Parts Thereof from China
Inv. Nos.: 731-TA-1047 (Review)
Date and Time: April 13, 2010 - 11:00 a.m.

Sessions were held in connection with this review in the Main Hearing Room, 500 E Street (room 101), SW, Washington, D.C.

OPENING REMARKS:

In Support of Continuation of Order (**Frederick L. Ikenson**,
Blank Rome LLP)

In Opposition to Continuation of Order (**William E. Perry**,
Dorsey & Whitney)

In Support of Continuation of Antidumping Duty Order:

Blank Rome LLP
Washington, D.C.
on behalf of

Home Products International, Inc. ("HPI")

David R. Kogan, Director of Operations, HPI

Jaci G. Volles, Executive Vice President of Sales
and Marketing, HPI

Dr. Michael D. Bradley, Department of Economics,
The George Washington University

Frederick L. Ikenson) – OF COUNSEL

**In Opposition to Continuation of
Antidumping Duty Order:**

Dorsey & Whitney
Seattle, WA
on behalf of

Polder Inc.
Whitney Design
Since Hardware

Cal Scott, president and Owner, Polder Inc.

Kerry Cooper, Sales Manager, Polder Inc.

William E. Perry) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

In Support of Continuation of Order (**Frederick L. Ikenson**,
Blank Rome LLP)

In Opposition to Continuation of Order (**William E. Perry**,
Dorsey & Whitney)

APPENDIX C
SUMMARY DATA

Table C-1
Ironing tables: Summary data concerning the U.S. market, 2004-09

(Quantity=1,000 units, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per unit; period changes=percent, except where noted)

Item	Reported data						Period changes					
	2004	2005	2006	2007	2008	2009	2004-09	2004-05	2005-06	2006-07	2007-08	2008-09
U.S. consumption quantity:	***	***	***	***	***	***	***	***	***	***	***	***
Amount	***	***	***	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***	***	***	***
Importers' share (1):	***	***	***	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***	***	***	***
U.S. consumption value:	***	***	***	***	***	***	***	***	***	***	***	***
Amount	***	***	***	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***	***	***	***
Importers' share (1):	***	***	***	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***	***	***	***
U.S. shipments of imports from:												
China:												
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
All other sources:												
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
All sources:												
Quantity	1,641	1,925	1,741	1,116	1,553	755	-54.0	17.3	-9.5	-35.9	39.1	-51.4
Value	16,730	22,160	21,101	17,548	20,975	12,181	-27.2	32.5	-4.8	-16.8	19.5	-41.9
Unit value	\$10.20	\$11.51	\$12.12	\$15.72	\$13.51	\$16.14	58.3	12.9	5.3	29.7	-14.1	19.5
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
U.S. producers:	***	***	***	***	***	***	***	***	***	***	***	***
Average capacity quantity	***	***	***	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***	***	***	***
Capacity utilization (1)	***	***	***	***	***	***	***	***	***	***	***	***
U.S. shipments:	***	***	***	***	***	***	***	***	***	***	***	***
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Export shipments:	***	***	***	***	***	***	***	***	***	***	***	***
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
Inventories/total shipments (1)	***	***	***	***	***	***	***	***	***	***	***	***
Production workers	***	***	***	***	***	***	***	***	***	***	***	***
Hours worked (1,000s)	***	***	***	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000s)	***	***	***	***	***	***	***	***	***	***	***	***
Hourly wages	***	***	***	***	***	***	***	***	***	***	***	***
Productivity (units per hour)	***	***	***	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***	***	***	***
Net sales:	***	***	***	***	***	***	***	***	***	***	***	***
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	***	***	***	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***	***	***	***
COGS/sales (1)	***	***	***	***	***	***	***	***	***	***	***	***
Operating income or (loss)/ sales (1)	***	***	***	***	***	***	***	***	***	***	***	***

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Undefined.

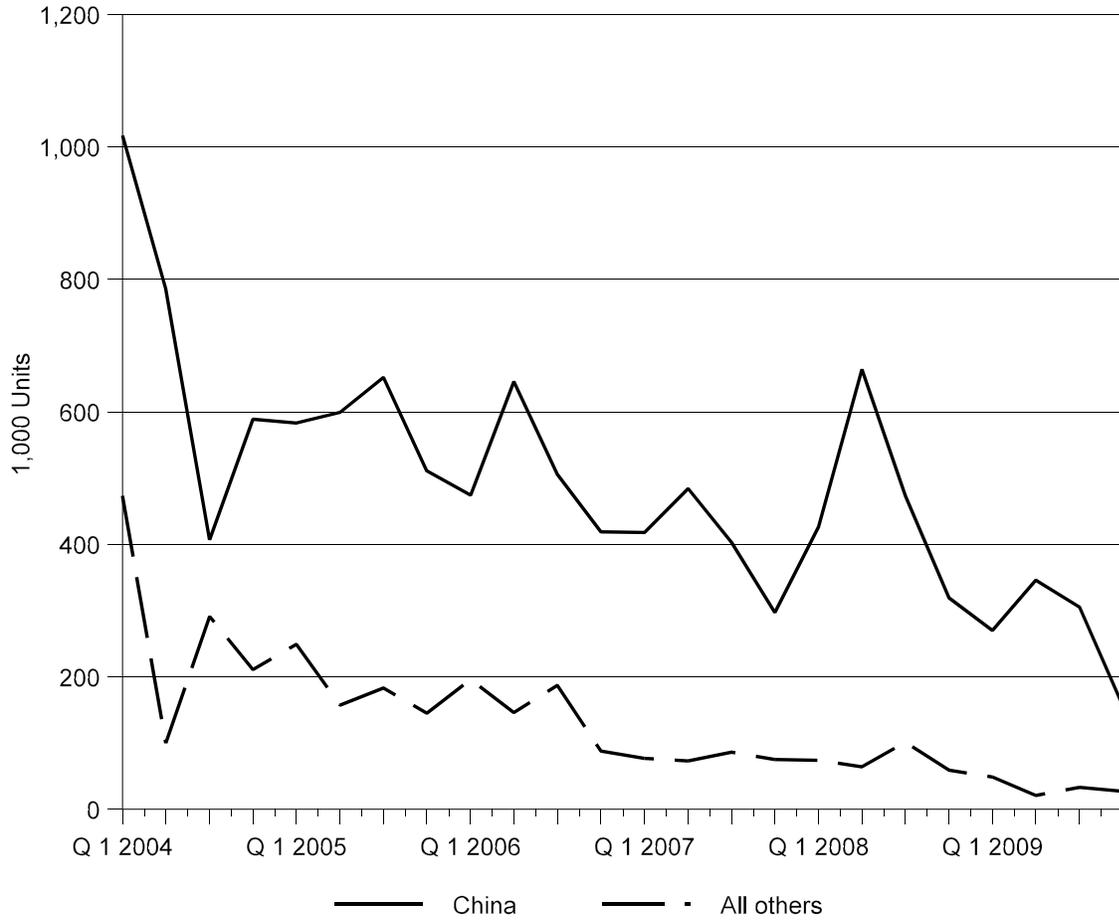
Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires.

Table C-2
Ironing tables: U.S. imports, by leading sources, 2004-09

Source	Calendar year					
	2004	2005	2006	2007	2008	2009
Quantity (1,000 units)						
China	2,798	2,345	2,045	1,602	1,883	1,077
Taiwan	565	299	357	42	43	24
Italy	156	123	29	32	24	13
Mexico	85	50	65	32	27	20
India	27	35	37	65	31	20
France	19	31	37	16	57	13
Netherlands	54	58	6	2	13	3
Poland	2	18	20	24	23	15
All other sources	168	119	65	98	80	23
Total	3,873	3,079	2,663	1,914	2,180	1,208
Value (1,000 dollars)¹						
China	28,785	23,067	20,130	16,858	20,485	13,708
Taiwan	4,340	3,123	2,972	430	576	152
Italy	2,649	1,698	592	588	649	359
Mexico	1,372	1,208	1,242	886	692	628
India	304	305	325	528	270	303
France	304	440	519	305	802	186
Netherlands	793	786	104	60	205	70
Poland	30	220	321	366	399	262
All other sources	3,812	2,376	1,428	1,656	1,687	585
Total	42,390	33,223	27,633	21,676	25,765	16,254
Unit value (per unit)						
China	10.29	9.84	9.84	10.52	10.88	12.72
Taiwan	7.68	10.44	8.32	10.29	13.45	6.22
Italy	16.97	13.86	20.37	18.46	27.27	27.69
Mexico	16.22	24.28	19.14	27.29	25.77	32.08
India	11.14	8.63	8.68	8.14	8.78	15.05
France	16.39	14.01	13.90	18.51	14.01	14.09
Netherlands	14.80	13.51	17.27	26.81	15.53	22.40
Poland	16.82	12.14	15.75	15.47	17.62	17.53
All other sources	22.74	19.99	21.94	16.82	20.97	26.02
Average	10.95	10.79	10.38	11.33	11.82	13.45
¹ Landed, duty-paid. Note.—Countries ranked based on total quantity of imports during 2004-09. Source: Compiled from official Commerce statistics (HTS 9403.20.0011).						

Figure C-1
Ironing tables: U.S. imports, by quarters and by sources, 2004-09



Source: Compiled from official Commerce statistics.

APPENDIX D

**COMMENTS BY U.S. PRODUCER, IMPORTERS, PURCHASERS,
AND FOREIGN PRODUCERS REGARDING THE EFFECTS OF THE
ORDERS AND THE LIKELY EFFECTS OF REVOCATION**

**U.S. PRODUCER'S COMMENTS REGARDING THE SIGNIFICANCE OF THE
ANTIDUMPING DUTY ORDER AND THE LIKELY EFFECTS OF REVOCATION**

**Effect Of The Order
(Question II-16)**

The Commission requested U.S. producer to describe the significance of the existing antidumping duty order covering imports of ironing tables and certain parts thereof from China in terms of its effect on its firm's production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. Its response is as follows:

* * * * *

**Likely Effect Of Revocation Of The Order
(Question II-17)**

The Commission requested U.S. producer to describe any anticipated changes in its production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of ironing tables and certain parts thereof in the future if the antidumping duty order on ironing tables and certain parts thereof from China were to be revoked. Its responses are as follows:

* * * * *

**Anticipated Changes In Operations In The Event The Order Is Revoked
(Question II-4)**

The Commission requested U.S. producer to describe anticipated changes in the character of its operations or organization relating to the production of ironing tables and certain parts thereof in the future if the antidumping duty order on ironing tables and certain parts thereof from China were to be revoked. Its response is as follows:

* * * * *

**U.S. IMPORTERS' COMMENTS REGARDING THE SIGNIFICANCE OF THE
ANTIDUMPING DUTY ORDER AND THE LIKELY EFFECTS OF REVOCATION**

**Effect Of The Order
(Question II-10)**

The Commission requested U.S. importers to describe the significance of the existing antidumping duty order covering imports of ironing tables and certain parts thereof in terms of its effect on their firm's imports, U.S. shipments of imports, and inventories. Their responses are as follows:

* * * * *

**Likely Effect Of Revocation Of Order
(Question II-11)**

The Commission requested U.S. importers to describe anticipated changes in their imports, U.S. shipments of imports, or inventories of ironing tables and certain parts thereof in the future if the antidumping duty order on ironing tables and certain parts thereof were to be revoked. Their responses are as follows:

* * * * *

**Anticipated Changes In Operations In The Event The Order Is Revoked
(Question II-4)**

The Commission requested U.S. importers to describe anticipated changes in the character of their operations or organization relating to the importation of ironing tables and certain parts thereof in the future if the antidumping duty order on ironing tables and certain parts thereof from China were to be revoked.

* * * * *

PURCHASER COMMENTS REGARDING LIKELY EFFECTS OF REVOCATION

Likely Effects of Revocation (Question III-27)

The Commission requested U.S. purchasers to describe likely effects of any revocation of the antidumping duty order for imports of ironing tables from China. As appropriate, please discuss any potential effects of revocation of the antidumping duty order on (1) the future activities of your firm and (2) the market as a whole.

* * * * *

FOREIGN PRODUCERS'/EXPORTERS' COMMENTS REGARDING THE SIGNIFICANCE OF THE ANTIDUMPING DUTY ORDER AND THE LIKELY EFFECTS OF REVOCATION

**Significance Of The Order
(Question II-12)**

The Commission requested foreign producers/exporters to describe the significance of the existing antidumping duty order covering imports of ironing tables and certain parts thereof from China in terms of its effect on their firms' production capacity, production, home market shipments, exports to the United States and other markets, and inventories. Their responses are as follows:

* * * * *

**Anticipated Changes If The Order Revoked
(Question II-13)**

The Commission requested foreign producers/exporters to describe any anticipated changes in their production capacity, production, home market shipments, exports to the United States and other markets, or inventories relating to the production of ironing tables and certain parts thereof from China if the antidumping duty order on ironing tables and certain parts thereof from China were to be revoked. Their responses are as follows:

* * * * *

**Anticipated Changes In Operations In The Event The Order Is Revoked
(Question II-4)**

The Commission requested foreign producers/exporters to describe anticipated changes in the character of their operations or organization relating to the production of ironing tables and certain parts thereof in the future if the antidumping duty order on ironing tables and certain parts thereof from China were to be revoked. Their responses are as follows:

* * * * *

APPENDIX E

**U.S. PRODUCER'S SELLING PRICES OF PRODUCTS 1 AND 3 COMBINED,
AND
U.S. IMPORTERS' SELLING PRICES OF THE CHINESE PRODUCTS 3 AND
4 COMBINED**

Tables E-1 and E-2 show selling prices based on combinations of ironing table products to account for any competition between certain products. Table E-1 shows price data for the domestic products 1 and 3 combined and price data for the imported product 3 from China; this corresponds to price data comparisons in the final phase of the original investigation between the domestic product—floor standing, metal perforated-top ironing tables, T-leg, with pad and cover and the following product imported from China--floor standing, metal mesh-top ironing tables, T-leg, with pad and cover. Table E-2 shows price data for the domestic product 3 and combined price data for the imported products 3 and 4. These latter data are shown to include *** prices of product 4, the heavier-steel version of product 3, which were consistently below those of domestic product 3.

Table E-1

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic ironing table products 1 and 3 combined and the imported Chinese product 3, by quarters, January 2004-December 2009

* * * * *

Table E-2

Ironing tables: Net weighted-average U.S. f.o.b. selling (unbundled) prices and quantities of the domestic ironing table product 3 and the imported Chinese products 3 and 4 combined, by quarters, January 2004-December 2009

* * * * *

