Chapter 6
The Commission’s Headquarters and Field Office Buildings

Photo: The old and current Commission headquarters buildings.
Paul R. Bardos

The U.S. International Trade Commission has since 1988 housed its personnel in a single building at 500 E Street, SW, in Washington, DC. Prior to 1988, the Commission and its predecessor the U.S. Tariff Commission occupied space at a number of locations in Washington and elsewhere. The following is a brief description of this history.

In addition to acquiring its own office space, the Commission has sent employees to assist other agencies, such as the Office of the U.S. Trade Representative, and has used space in various locations, such as the Washington Navy Yard, for offsite storage of documents and other materials. Such activities are beyond the scope of this chapter.

Offices in Washington, DC, 1917–Present

The Commission’s organic statute provides: “The principal office of the commission shall be in the city of Washington, but it may meet and exercise all its powers at any other place.” Throughout its history, the Commission has maintained its headquarters in the city of Washington.

Although the Tariff Commission was created by statute on September 8, 1916, the agency did not move into office space until early 1917. According to the Commission’s first annual report, “The Commission was compelled to remain in temporary quarters until the close of the fiscal year [ending June 30, 1917]. During this period arrangements were made for permanent quarters, which have been secured with convenient and ample accommodations at moderate cost, at 1322 New York Avenue.” The address of the temporary quarters is not indicated, but in the event, occupancy was brief.

362 Such materials have included physical exhibits in Commission investigations. At one time, the agency had in storage an operational Ms. Pacman videogame console, a large iron stove, and athletic shoes and luggage sliced in half to show their construction.
The Commission remained at its headquarters on New York Avenue until April 1922.\textsuperscript{365} Today, 1322 New York Avenue is no longer a separate address, but has been subsumed in 1300 New York Avenue, NW, the headquarters of the Inter-American Development Bank.\textsuperscript{366}

In April 1922, the Commission moved its headquarters to the Old Land Office Building, also called the General Post Office Building, at 701 E Street NW.\textsuperscript{367} Occupancy of this space would continue until January 1988.\textsuperscript{368}

The Commission’s new headquarters had had an eventful history. This edifice, which became the U.S. International Trade Commission Building, occupies the block bordered by 7th, 8th, E, and F Streets, NW. In 1795, soon after Washington became the nation’s capital, building began on Blodgett’s Hotel on the south portion of this block. Attributed to James Hoban, architect of the White House, the hotel hosted the first theatrical performance in the city. In 1810, the federal government purchased the building to house the Post Office Department, the City Post Office, and the Patent Office. On August 24, 1814, British army troops occupied Washington. In response to the American burning of what would later become Toronto, Canada, the British put to the torch the Capitol, the White House, and other public and private structures. Dr. William Thornton, the Commissioner of Patents, faced down British troops at Blodgett’s Hotel, calling on them to spare “the Patent Office, the depository of the ingenuity of the American Nation.” Somehow this appeal worked, and the invaders withdrew. In 1815, Congress convened temporarily in this building. The structure burned down—without British assistance—in 1836, the cause attributed to “an incautious servant who inadvertently deposited live fireplace ashes in a wooden dustbin.”\textsuperscript{369}

Design and construction began on a new building, commissioned by President Andrew Jackson, in 1839. Architect Robert Mills, who would later design the Washington Monument, designed a neoclassical structure that referenced Italian Renaissance architect Andrea Palladio. The building was completed in 1842. Thomas Ustick Walter, who designed the U.S. Capitol dome, oversaw the building’s expansion, which began in 1855 and continued through 1866 in the

\textsuperscript{366} \url{http://www.iadb.org/mobile/common/contacts/headquarters.cfm}.
\textsuperscript{367} USTC, \textit{10th Annual Report}, 1926, 3. The website of the General Services Administration (GSA) lists the occupation year as 1932 (see the Overview tab at “General Post Office, Washington, DC,” \url{http://www.gsa.gov/portal/ext/html/site/hb/category/25431/actionParameter/exploreByBuilding/buildingld/870} . However, both the National Register of Historic Places Nomination Form (see p. 65) and a General Services Administration report (see p. HR-2) list the date as 1922. This discrepancy in the year may be due to the fact that the Commission shared the building with several other entities between 1922 and 1932 but, by 1932, the Commission “filled all except the entrance floor of the building.” Denys Peter Myers, \textit{General Services Administration, Historic Report of the General Post Office (Now International Trade Commission Building)}, (“Historic Report”), HR-2).
\textsuperscript{369} See \textit{Historic Report}, HR-4.
Roman Corinthian style. The rectangular structure surrounds a central courtyard. The building’s walls range in thickness from 2½ feet to 3½ feet, with the outer walls covered in Carrara marble. The structure was reinforced with iron railroad ties. One window still shows messages scratched into it by soldiers from the Civil War and Reconstruction eras.

A notable feature of the building is its two spiral stairways, cantilevered and built of granite and marble, overlooked by skylights. The top floor room that housed the Commission’s library was decorated with columns, ornate domes, and another skylight. In order to permit air circulation while providing privacy, office doors were equipped with louvered swinging doors in addition to their conventional doors. Employees found that they had to walk down the center of corridors to avoid being hit by a swinging door.

Originally intended to house the Post Office Department, the building continued to include a post office throughout the Commission’s occupancy. At various times, the building also housed staff of the General Land Office of the Interior Department (hence the building’s alternative name), the Panama Canal Commission, the War Claims Commission, the Selective Service Board, a Congressional subcommittee, and General of the Armies John J. “Black Jack” Pershing. General Pershing made the building his headquarters while he wrote his report on the American Expeditionary Forces’ conduct during World War I.370 The General Services Administration (GSA) used a building in the central courtyard as a school for its security guards. An Army detachment was garrisoned in the building during the 1968 riots. The Commission at first occupied only a relatively small portion of the building, but gradually took over more space until by 1987 it controlled most of the structure.371 The building was placed on the National Register of Historic Places on November 11, 1971.372

For most of the Commission’s tenure at 701 E Street, that building was the only location the agency occupied in Washington. However, construction of the underground Metrorail system significantly altered this situation. On February 25, 1975, it was discovered that the work had damaged the foundation of the southeast corner of the Commission’s building. As a result, significant portions of the staff had to be relocated. The first relocation was to the Federal

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370 See Historic Report, HR-1.
371 Information about the building’s construction and occupancy is from U.S. International Trade Commission, The International Trade Commission Building (Washington, DC: GPO, 1980), and conversations with Kenneth Mason, former Secretary. GSA used the guard school in part for training in firefighting and prevention. The building included a large set of fire alarms to help guards familiarize themselves with such equipment, and a fireproof room for setting and extinguishing fires. The smoke went up through a huge chimney. After this practice ended around 1970, the chimney was taken down. Because of the historic nature of the structure, the demolition had to be by hand. A brave man climbed into the chimney and hammered out the bricks one by one. The guard school was later used for exhibit and publication storage.
Triangle Building on 9th Street, NW.\textsuperscript{373} Staff also was relocated to the Bicentennial Building, 600 E Street, NW.\textsuperscript{374}

Repairs of the Metro-related damage were completed during FY 1977.\textsuperscript{375} However, the Commission continued to move personnel to satellite locations. In addition to the Bicentennial Building, these included the Dodge Center (later renamed the Waterfront Center), at 1010 Wisconsin Avenue, NW, in Georgetown, and the Interstate Commerce Commission (ICC) Building, at 12th Street and Constitution Avenue, NW.\textsuperscript{376}

Since the Commission's main building did not have space suitable for courtrooms, the Office of the Administrative Law Judges was moved to the ICC Building after a temporary stay in the Georgetown office. Features of the offices occupied by Commission personnel there included very tall windows, sinks, and an overactive heating system. Designed by architect Arthur Brown, Jr. and completed in 1934, the building’s look was popular with filmmakers, who used it for the 1983 television miniseries \textit{The Winds of War}. In addition, some internal and external shots were filmed for the 1987 movie \textit{Suspect}. This may have interfered with some Commission functions, as employees were drawn downstairs to get a peek at movie star Cher.\textsuperscript{377}

At headquarters, the undermined foundation was not the only problem. The aging structure experienced roof leaks,\textsuperscript{378} falling plaster, and electrical problems. Drinking fountains were blocked off due to the poor quality of the water. Anticipating that the Commission building would be taken over by the Smithsonian Institution, GSA decided not to make major repairs.\textsuperscript{379} In addition, the building suffered from a rodent infestation in the early 1980s. An employee reported: “The squeamish cannot survive long here.”\textsuperscript{380} The situation worsened when poison was put down that caused the rats to burst when they drank water. When it was announced that the Commission was moving, \textit{Washington Business} declared: “No more exploding rats for the staff of the International Trade Commission.”\textsuperscript{381}

\textsuperscript{373} USITC, \textit{Annual Report 1975}, USITC Publication 790 (Washington, DC: USITC, November 1976), 27.
\textsuperscript{374} USITC, \textit{Annual Report 1976}, 23.
\textsuperscript{377} Judge David Shaw, February 24, 2017; conversation with Monty Fusco, formerly a law clerk in the Office of the Administrative Law Judges, May 12, 2016.
\textsuperscript{378} In June 1983, a rainstorm drenched the work area of Commission economists, and they found themselves working in about 2 inches of water. Alfred. E. Eckes, \textit{Diary}, June 25–July 1, 1983.
\textsuperscript{379} \textit{Federal Times}, May 2, 1983.
\textsuperscript{381} \textit{Washington Business}, June 16, 1986.
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To make room for the Smithsonian, GSA considered moving the Commission to various alternative locations. One of these was the Bicentennial Building, which Commission personnel found to be sub-standard and roach-infested. GSA tried to deal with the infestation but its exterminator set off noxious fumes that forced the Commission to send several staff members home. A press headline read “Insecticide Routs 17 ITC Staffers.”

On April 21, 1983, for the first time in the Commission’s history, members of the Senate Finance Committee, including Chairman Bob Dole (R-KS) and Ranking Member Russell Long (D-LA), came to lunch at the agency. They toured the building and were told of concerns about its condition. In June 1983, the Senate Public Works Committee voted to transfer the building to the Smithsonian. However, the Commission escaped being moved to the Bicentennial Building. Instead, starting in late 1987 the agency moved to an entirely new building at 500 E Street, SW.

The Commissioners of the time participated in a groundbreaking ceremony for the new building. At that groundbreaking, Senator Long, representing the Finance Committee, said that Congress has “confidence in the quality” of the Commission’s “work and independence,” and that “it is appropriate that an agency with such an important function should have good quarters.”

Boston Properties, the owner of the Commission’s current headquarters building, has described it as follows: “This nine-story Class A headquarters-quality office building features court rooms, a roof-top terrace facing both the U.S. Capitol and Potomac River, and a below-grade parking garage with approximately 214 spaces.” Designed with input from the Commission, the building is recognizable by a distinctive rounded “bullnose” feature on its west end, topped by a gazebo on the roof. The structure is located across 6th Street from Saint Dominic’s Catholic Church, which was built in the 19th Century. To an extent, the bullnose and gazebo harmonize with the church’s spire.

The Commission completed its move to its new headquarters building in January 1988, closing all satellite offices in the process. The agency has made its home at 500 E Street, SW, through the present day. The Commission occupies most of the building (including space on the first through the seventh floors), sharing it with staff of the Social Security Administration and, at times, other entities. The building initially included a Main Hearing Room and four courtrooms. For a time, the agency gave up control of the second floor, with its two courtrooms, but more

382 Alfred E. Eckes, Diary, March 30–July 1, 1983.
383 Ibid.
recently increasing activity related to intellectual property cases prompted a resumption of the occupation of that floor, and a renovation to accommodate an additional courtroom that was fitted with modern video and internet technology.

The lease for the Commission’s office space was to expire on August 10, 2017, but GSA entered into a new, 15-year lease that will allow the Commission to retain its current location.

Meanwhile, the former headquarters building at 701 E Street, NW, was substantially renovated and is now occupied by the Kimpton Hotel Monaco. Converting the building into a 183-room hotel took two years and cost $36 million. The Hotel Monaco offers 183 guest rooms, including 16 suites. The old designation of a basement and three stories was replaced by four stories. During the renovation, the hotel removed and catalogued the swinging doors and stored them in a basement that had once been used as a firing range. The old library and the main hearing room were turned into ballrooms. The Guard School became Poste, a restaurant whose name reflects the Post Office’s links with the building. GSA imposed strict limits on the renovation because of the historic nature of the building. For example, no hole larger than a quarter could be drilled without GSA’s permission. For its part, GSA removed one of the building’s elevators, allowing for the restoration of one of the grand spiral stairways.386

As a final note on the building, here is how a GSA report described it:

One of the finest works of two of America’s most distinguished architects of their day, Robert Mills and Thomas Ustick Walter, this Designated National Historic Landmark epitomizes the architectural aspirations of the Jacksonian age—aspirations toward classical balance combined with restrained elegance that were splendidly fulfilled in this, the first major marble building in Washington.387

**Offices in New York, 1922–83**

The organic statute provides for at least one office outside of Washington, DC:

The commission is authorized to establish and maintain an office at the port of New York for the purpose of directing or carrying on any investigation, receiving and compiling statistics, selecting, describing, and filing samples of articles, and performing any of the duties or exercising any of the powers imposed upon it by law.388

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386 Information about the Hotel Monaco was provided by Ed Virtue, general manager of the hotel; a brochure from the hotel entitled “Where History Stays In Style”; and Kimpton Hotel & Restaurant Group, “the Heart of the Action,” http://www.monaco-dc.com/hotel/penn-quarter.html.

387 Historic Report, HR-78.

In 1922, the Commission opened a field office on the southern tip of Manhattan in the Custom House at 1 Bowling Green, New York, New York.  

Designed in the Beaux-Arts style by architect Cass Gilbert, the building, later renamed the Alexander Hamilton U.S. Custom House, was constructed at the start of the 20th century. The U.S. Customs Service moved out in the 1970s and into the World Trade Center. The building now houses the U.S. Bankruptcy Court for the Southern District of New York and, since 1994, part of the Smithsonian’s National Museum of the American Indian.

In 1978, the Commission’s New York office moved to the World Trade Center. This new occupancy was short-lived, however, as the New York office was eliminated as a separate unit in 1980, and closed in 1983.

**Office in Richmond, 1935–41**

In 1935, the Commission began participating in a series of projects in cooperation with the Works Progress Administration (WPA) shortly after President Franklin D. Roosevelt created that New Deal agency. Two of the projects took place in cities where the Commission already had a presence, i.e., Washington and New York. The first project, however, begun in December 1935, was located in Richmond, Virginia. The office there was staffed mainly by people recruited from WPA relief rolls and supervised by a small number of Commission personnel. All of the WPA projects ended during FY 1941.
Offices in Europe, 1923-36

Early in its history, the Commission decided that it needed offices in Europe in order to gather trade data. In July 1923, the agency opened a European headquarters in Berlin, Germany. From there, a chief investigator began to direct field investigations in central Europe. In the same year, a field office was established in Paris, France, for investigations in western Europe. The Paris office did not last long; it was closed in the fall of 1924 when the Commission agent in Paris resigned.

In June 1925, the European headquarters moved from Berlin to Brussels, Belgium. The Commission’s annual reports do not identify the street addresses of the European offices. Nevertheless, the address of the Brussels office (for at least part of the time the agency had a presence in Belgium) can be identified through another source. In 1927, a Commission accountant visited the office in Brussels and sought reimbursement for travel expenses. This led to a decision by the Comptroller General denying part of those expenses. In his determination, the Comptroller General identified the address as Rue de Spa 15 in Brussels. Today, according to Google Maps, Rue de Spa 15 is a townhouse occupied by offices; it is not a modern building, so it may not look substantially different than it did in the 1920s.

The Brussels office appears to have been closed in 1936. This was the last of the Commission’s offices outside of the United States.

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398 The 1936 annual report shows a “European representative” was in place as of June 30, 1935, but was no longer there by June 30, 1936. USTC, Twentieth Annual Report, 1936, 58.
Part III
Tariffs