

Chapter 6

The Commission's Headquarters and Field Office Buildings



Photo: The old and current Commission headquarters buildings.

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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.³⁶² 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.”³⁶³ 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.³⁶⁴

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.

³⁶³ 19 U.S. Code (U.S.C.) § 1331(d).

³⁶⁴ U.S. Tariff Commission (USTC), *First Annual Report of the United States Tariff Commission for the Fiscal Year Ended June 30, 1917*, H. Doc. 65–616 (Washington, DC: GPO, November 15, 1917), 4.

The Commission remained at its headquarters on New York Avenue until April 1922.³⁶⁵ 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.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.³⁶⁷ Occupancy of this space would continue until January 1988.³⁶⁸

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."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

³⁶⁵ USITC, *Tenth Annual Report of the USITC June 30, 1926* (Washington, DC: GPO, December 7, 1926), 3.

³⁶⁶ <http://www.iadb.org/mobile/common/contacts/headquarters.cfm>.

³⁶⁷ USITC, *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," <http://www.gsa.gov/portal/ext/html/site/hb/category/25431/actionParameter/exploreByBuilding/buildingId/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, General Services Administration, *Historic Report of the General Post Office (Now International Trade Commission Building)*, ("Historic Report"), HR-2).

³⁶⁸ USITC, *Annual Report 1988*, USITC Publication 2140 (Washington, DC: USITC, January 1988) 3.

³⁶⁹ See *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

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.

³⁷² See the Significance tab at GSA, "General Post Office, Washington, DC," <http://www.gsa.gov/portal/ext/html/site/hb/category/25431/actionParameter/exploreByBuilding/buildingId/870>.

Triangle Building on 9th Street, NW.³⁷³ Staff also was relocated to the Bicentennial Building, 600 E Street, NW.³⁷⁴

Repairs of the Metro-related damage were completed during FY 1977.³⁷⁵ 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.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 *The Winds of War*. In addition, some internal and external shots were filmed for the 1987 movie *Suspect*. This may have interfered with some Commission functions, as employees were drawn downstairs to get a peek at movie star Cher.³⁷⁷

At headquarters, the undermined foundation was not the only problem. The aging structure experienced roof leaks,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.³⁷⁹ In addition, the building suffered from a rodent infestation in the early 1980s. An employee reported: "The squeamish cannot survive long here."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, *Washington Business* declared: "No more exploding rats for the staff of the International Trade Commission."³⁸¹

³⁷³ USITC, *Annual Report 1975*, USITC Publication 790 (Washington, DC: USITC, November 1976), 27.

³⁷⁴ USITC, *Annual Report 1976*, 23.

³⁷⁵ USITC, *Annual Report 1977*, USITC Publication 868 (Washington, DC: USITC, March 1978), 31.

³⁷⁶ USITC, *Annual Report 1980*, USITC Publication 1084 (Washington, DC: USITC, July 1981), 58; *Annual Report 1981*, USITC Publication 1352 (Washington, DC: February 1983), 27; *Annual Report 1983*, USITC Publication 1580 (Washington, DC: USITC, September 1984), 33; *1984 Annual Report*, USITC Publication 1718 (Washington, DC: USITC, July 1985), 34.

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.

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, *Diary*, June 25–July 1, 1983.

³⁷⁹ *Federal Times*, May 2, 1983.

³⁸⁰ *Washington Times*, April 2, 1985.

³⁸¹ *Washington Business*, June 16, 1986.

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."³⁸²

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.³⁸³ 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."³⁸⁴

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."³⁸⁵ 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.*

³⁸⁴ USITC, *Annual Report 1986*, USITC Publication 1935 (Washington, DC: USITC, January 1987), 35.

³⁸⁵ Boston Properties, "500 E Street, SW," <http://www.bostonproperties.com/properties/washington-dc/ahNzfmJvc3RvbnByb3BlcnRpZXMycgwLEgRQYWdlGKSeAww/500-e-street,-sw>.

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

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.

³⁸⁸ 19 U.S.C. §1331(e).

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.³⁸⁹

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.³⁹⁰

In 1978, the Commission's New York office moved to the World Trade Center.³⁹¹ This new occupancy was short-lived, however, as the New York office was eliminated as a separate unit in 1980, and closed in 1983.³⁹²

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 1941.³⁹³

³⁸⁹ USITC, *Annual Report 1978*, USITC Publication 982 (Washington, DC: USITC, June 1979) 28.

³⁹⁰ See [nyc-architecture.com](http://nyc-architecture.com/LM/LM012-ALEXANDERHAMILTONCUSTOMHOUSE.htm), "Alexander Hamilton Custom House," <http://nyc-architecture.com/LM/LM012-ALEXANDERHAMILTONCUSTOMHOUSE.htm>. Gilbert also designed the Woolworth Building in New York in 1910, state capitol buildings, and the U.S. Supreme Court building in Washington, DC.

³⁹¹ USITC, *Annual Report 1978*, 28. In particular, the Commission maintained a library in Suite 629, 6 World Trade Center. *Ibid.*

³⁹² USITC, *Annual Report 1980*, 48; 45 Fed. Reg. 75025, November 13, 1980. Then-Chairman Alfred Eckes visited the office's two employees in 1982. They were collecting synthetic organic chemical statistics. They had an office with no telephone, no electricity except for neon lighting, and a "rather dreadful interior room." Alfred E. Eckes, *Diary*, April 23, 1982.

³⁹³ *Twentieth Annual Report of the USTC, 1936* (Washington, DC: GPO, December 1, 1936), 53; *Twenty-fifth Annual Report of the USTC, 1941* (Washington, DC: GPO, December 1, 1941), 50.

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.³⁹⁴ The Paris office did not last long; it was closed in the fall of 1924 when the Commission agent in Paris resigned.³⁹⁵

In June 1925, the European headquarters moved from Berlin to Brussels, Belgium.³⁹⁶ 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.³⁹⁷ 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 1936.³⁹⁸ This was the last of the Commission's offices outside of the United States.

³⁹⁴ USTC, *Seventh Annual Report of the USTC, 1923* (Washington, DC: GPO, December 3, 1923), 3. The Commission also determined to establish a London office, prior to the consolidation of offices in Brussels. Senate Finance Committee, *Minutes of the Meetings of the United States Tariff Commission*, 69th Congress, 1st sess., Document No. 83, 141 (1926).

³⁹⁵ USTC, *Ninth Annual Report of the USTC, 1925* (Washington, DC: GPO, December 8, 1925), 3.

³⁹⁶ *Eleventh Annual Report of the USTC, 1927* (Washington, DC: GPO, December 5, 1927), 4.

³⁹⁷ 7 Comp. Gen. 276, A-20116, "Subsistence-Per Diem in Lieu of-Headquarters" (October 19, 1927).

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

