

**UNITED STATES TARIFF COMMISSION**

**UMBRELLAS AND PARTS OF UMBRELLAS (EXCEPT HANDLES)**

**Report to the President on Investigation No. TEA-I-6 Under  
Section 301(b)(1) of the Trade Expansion Act of 1962**



**TC Publication 136**

**Washington, D.C.  
September 1964**

**UNITED STATES TARIFF COMMISSION**

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(TC29118)

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REPORT TO THE PRESIDENT

U.S. Tariff Commission,  
September 1, 1964.

To the President:

In accordance with section 301(f)(1) of the Trade Expansion Act of 1962 (76 Stat. 885), the U.S. Tariff Commission herein reports the results of an investigation made under section 301(b) of that act relating to umbrellas and parts of umbrellas (except handles).

Introduction

The purpose of the investigation to which this report relates was to determine whether--

umbrellas and parts of umbrellas (except handles) provided for in items 751.05 and 751.15-.25 of the Tariff Schedules of the United States

are, as a result in major part of concessions granted thereon under trade agreements, being imported into the United States in such increased quantities as to cause, or threaten to cause, serious injury to the domestic industry or industries producing like or directly competitive articles.

The investigation was instituted on March 5, 1964, upon petition filed under section 301(a)(1) of the Trade Expansion Act on January 10, 1964, and amended March 2, 1964, 1/ by Umbrella Manufacturers & Suppliers, Inc., and Umbrella Frame Association of America, Inc. Public notice of the institution of the investigation and of a public hearing to be held in connection therewith was given by publication of the notice in the Federal Register (29 F.R. 3215). The public hearing was held on June 9 and 10, 1964, and all interested parties were afforded opportunity to be present, to produce evidence, and to be heard. A transcript of the hearing and formal briefs submitted by interested parties in connection with the investigation are attached. 2/

The imported umbrellas covered by this investigation include sunshades and umbrella bases (i.e., umbrellas that have been finished except for the handles). Virtually the only parts of umbrellas imported (other than handles) are umbrella frames. The information in this report, therefore, relates almost exclusively to umbrellas and umbrella frames.

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1/ The amendment to the petition stipulated that certain imported articles enumerated in the original petition need not be included in the investigation, namely, "waterproof cloth and wood, bamboo and rattan sticks in the rough or cut to length, . . . [and] canes and handles." The 6-month period within which the Commission is required to report to the President under section 301(f) of the Trade Expansion Act began Mar. 2, 1964, the date of filing of the amended petition.

2/ Transcript and briefs were attached to the original report sent to the President.

### Finding of the Commission

On the basis of its investigation the Commission unanimously finds that umbrellas and parts of umbrellas (other than handles) provided for in items 751.05 and 751.15-.25 of the Tariff Schedules of the United States are not, as a result in major part of concessions granted under trade agreements, being imported in such increased quantities as to cause, or threaten to cause, serious injury to the domestic industry or industries producing like or directly competitive articles.

### Considerations Supporting the Commission's Finding

The obligation of the Tariff Commission in investigations conducted under section 301(b)(1) of the Trade Expansion Act of 1962 is to determine and report whether the statutory provisions which authorize action by the President have been met. The conditions to be investigated are specifically enumerated in the law which instructs the Commission to determine:

1. Whether the article in question is being imported in increased quantities;
2. Whether the increased imports are a result in major part of concessions granted under trade agreements; and
3. Whether such increased imports have been the major factor in causing, or threatening to cause, serious injury to the domestic industry producing an article which is like or directly competitive with the imported article.

An affirmative finding in an investigation must rest on affirmative determinations respecting each of these requisites.

In the instant case, the Commission finds that any increase 1/ that may have occurred in imports of umbrellas and of umbrella frames in the most recent years is not attributable in major part to trade-agreement concessions. The concession on umbrellas became effective in 1950 and that on frames in 1951. The concessions tended to stimulate imports in the periods following the effective dates of the concessions and, presumably, since then have operated to maintain imports at higher levels than would have otherwise prevailed. The concessions, however, have become part of the conditions of trade during the past decade or so; the major causes of any increase in the rate of importation in the more recent years, of either umbrellas or umbrella frames, lie elsewhere.

This conclusion is substantiated by the pattern of imports in recent years which indicates that competitive factors in the trade, and not trade-agreement concessions, have been controlling. The volume of imports of umbrellas has been downward each year since 1959 except for a substantial rise in one year (1962) when the volume did not even closely approach the 1959 high. The volume of imports of frames has been at about the same level with moderate fluctuations since 1957, following a sharp decline from 1956. The volume of

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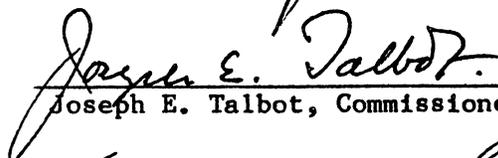
1/ There is considerable doubt that the evidence supports a finding that the articles in question are being imported in increased quantities (within the meaning of the Trade Expansion Act of 1962) but the Commission need not resolve this issue in view of its finding concerning the causes of any increases in imports that may have occurred.

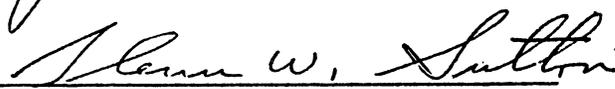
imports of frames as such, plus the much larger number incorporated in umbrellas, has followed much the same pattern as the imports of umbrellas. Data for 1964 indicate further declines in the imports of umbrellas and a continuation of the fluctuating but sideward movement in the importation of frames, as frames.

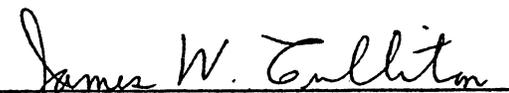
Both Japan and Hong Kong have developed improved supplier positions both in the United States and in many other markets of the world, not only for such articles as umbrellas, but also for a substantial variety of other export products, irrespective of changes in tariff levels in the receiving countries. Foreign producers have supplied many umbrellas and frames of types and qualities that sell at lower prices than most domestically produced umbrellas and frames. The availability of such lower priced articles has stimulated demand and opened wider markets for them.

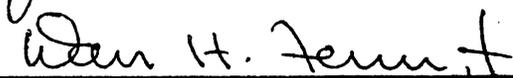
Respectfully submitted,

  
Ben Dorfman, Chairman

  
Joseph E. Talbot, Commissioner

  
Glenn W. Sutton, Commissioner

  
James W. Culliton, Commissioner

  
Dan H. Fenn, Jr., Commissioner

## Information Obtained in the Investigation

U.S. tariff treatment

Imported umbrellas are provided for under item 751.05 of the Tariff Schedules of the United States (TSUS) at the rate of 20 percent ad valorem (table 1). Prior to the effective date of the TSUS, umbrellas were classified under paragraph 155<sup>4</sup> of the Tariff Act of 1930. The rate originally provided by that act was 40 percent ad valorem. Pursuant to a concession initially negotiated with Italy under the GATT, the rate of duty was reduced, effective May 30, 1950, to the current rate of 20 percent ad valorem (table 2).

The TSUS provide for umbrella frames and parts thereof made of metal under item 751.20 at the rate of 30 percent ad valorem. <sup>1/</sup> Under the Tariff Act of 1930 umbrella frames were provided for in paragraph 342 and were originally dutiable thereunder at 60 percent ad valorem. Pursuant to a concession initially negotiated with Austria and Germany under GATT, the rate was reduced to 30 percent ad valorem, effective on October 1, 1951.

Sticks of wood used for umbrella shafts and valued not over \$2.50 per dozen are provided for in TSUS item 751.15 at the reduced trade-agreement rate of 24 percent ad valorem; item 751.25 provides for other parts of umbrellas, not of metal, at the reduced trade-agreement rate of 16 percent ad valorem. Imports dutiable under both

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<sup>1/</sup> Imports of metal parts for walking sticks, riding crops, etc., are also dutiable under TSUS item 751.20, but such imports have generally been nil or negligible. None of these articles, however, are among the imports covered by this investigation.

of these items (751.15 and 751.25) have consisted almost entirely of handles for umbrellas. For practical purposes, therefore, the imported articles identified by the Commission in its public announcement of March 5, 1964, are almost exclusively umbrellas 1/ and umbrella frames.

Description and uses

Umbrellas.--Umbrellas are commonly classified on the basis of their principal end use as rain umbrellas (including men's, women's, and children's) and sunshades (including beach, garden, lawn, and similar large umbrellas, as well as parasols, for use principally for protection from the sun). Other major categories of umbrellas are golf umbrellas and doormen's umbrellas. 2/ Imports of miniature umbrellas (which usually contain ribs under 12 inches long), such as those used as party favors or toys, are dutiable as toys and are not subject to this investigation. However, some children's small and inexpensive umbrellas and parasols having ribs more than 12 inches long have entered under TSUS item 751.05 and have been sold for use as toys, party favors, or carnival prizes. Such imports currently constitute less than 10 percent of the number of umbrellas imported under the TSUS classification for umbrellas (item 751.05).

In the United States, umbrellas are manufactured predominantly in plants using purchased parts and materials. In such plants, the principal operations performed by the manufacturer involve cutting and

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1/ Including sunshades.

2/ For the purpose of this investigation, golf and doormen's umbrellas are considered as rain umbrellas; however, they may be used also for protection from the sun.

sewing the cloth and attaching it to umbrella frames. No domestic producer of rain umbrellas manufactures umbrella frames. The cloth is cut and sewed by machine, and attached to the frame by hand or by machine.

About a third of the domestic producers of rain umbrellas also import such umbrellas, as well as umbrella bases (i.e., umbrellas that have been wholly finished except for the handles). Frequently, both the domestically produced and the imported umbrella bases are sold in lots, after which the seller and buyer agree on the type of handle to be attached. The cost of the handle usually constitutes only a small portion of the total cost of producing the finished umbrella.

Umbrella frames.--The imported umbrella parts to which this investigation relates consist of umbrella and parasol ribs and stretchers, whether or not in assembled frames, and rods (tubes) for umbrellas. Virtually all of these parts--whether imported or domestic--enter commerce in the form of assembled frames; hence, they are referred to hereinafter, either as "umbrella frames" or simply as "frames."

The umbrella frame is the central structure on which the cover, the rib tips, the ferrule, and the handle are assembled as the umbrella is manufactured. An umbrella frame consists of the following parts: A central shaft, usually of wood or steel; from 7 to 16 ribs; an equal number of stretchers; a notch permanently attached to the shaft to hold the ribs in place; and a runner (slide) attached to the stretchers but free to move along the shaft to open or close the umbrella. The

ribs are made of narrow steel strips and are usually fluted (forming a U-shaped cross section) and tempered to impart strength to the frame. Several types of umbrella frames incorporate special features, such as those for self-opening, self-closing, folding, and "wind proof" umbrellas.

Umbrella frames, both domestic and imported, are made in many different sizes, colors, and finishes. In the trade an umbrella frame is generally designated by the length and number of ribs. For example, a common size of frame is one designated as "19 x 16"; the first number refers to the combined length (in inches) of the ribs and the rib tip of the finished umbrella; and the second number refers to the number of ribs. Frames for ladies' umbrellas usually contain 10, 12, or 16 ribs of a given finished length, which ranges from 17 to 20 inches. Frames for men's umbrellas usually contain 7 to 10 ribs, 23 or more inches in length. The length of the ribs in other umbrella frames ranges from 13 inches for children's umbrellas to 31 inches for golfers' umbrellas.

#### U.S. consumption

Umbrellas.--Although the U.S. apparent annual consumption <sup>1/</sup> of umbrellas has varied considerably during the past 10 years, the trend has been slightly upward (table 3). During that period the domestic consumption of umbrellas reached three successively higher

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<sup>1/</sup> Production plus imports minus exports; data have not been adjusted for the changes in the yearend inventories held by producers and by importers.

peaks--1,206,000 dozen umbrellas in 1956; 1,321,000 dozen in 1959; and 1,357,000 dozen in 1962.

Many factors affect consumer purchases of umbrellas. Such purchases are influenced materially by changes in the amount and frequency of rainfall. Purchases are also influenced by changes in rainwear fashion and special new features of umbrellas, including telescopic or folding frames, flowered-print coverings, and pagoda shapes. Apparently the trend toward suburban shopping has reduced the need for umbrellas. The increasing use of rainproof scarves has also curtailed demand. The increased availability of lower priced umbrellas from Japan and Hong Kong, on the other hand, has stimulated purchases.

Umbrellas are used more by women than by men, as indicated by the following data on the types of rain umbrellas marketed by producers and importers in 1963:

<u>Type of rain umbrellas</u>	<u>Production (percent)</u>	<u>Imports (percent)</u>
Women's-----	68	62
Men's-----	17	23
Children's-----	11	11
All other-----	4	4
Total-----	<u>100</u>	<u>100</u>

The consumption of parasols (umbrellas for protection from the sun) is very small relative to that of rain umbrellas. <sup>1/</sup>

Umbrella frames.--Inasmuch as umbrella frames are used only in making umbrellas, the purchases of frames by U.S. producers of umbrellas

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<sup>1/</sup> Parasols vary greatly in size and price, from the small sunshades for children to the larger type used for tractors or on lawns.

(since none of them make frames) closely approximate the consumption of such frames in the United States. Similarly, the consumption of umbrella frames fluctuates with the U.S. production of umbrellas. In 1956, domestic consumption reached a peak of 923,000 dozen frames; it was considerably lower during 1957-61, but rose to 814,000 dozen in 1962; in 1963, a year of unusually light rainfall, consumption was about 14 percent lower than in 1962; the annual average for the period 1954-63 was 743,000 dozen (table 4).

#### U.S. producers

Umbrellas.--Between 50 and 60 companies are currently manufacturing various types of umbrellas in the United States. About 50 of them are located in the New York City area, 1 in Portland, Oregon, 2 in Philadelphia, 1 in Baltimore, 1 in Toledo, and 1 in Boston. During the past decade a few small concerns have entered into production, while considerably more have gone out of business. <sup>1/</sup> Most domestic umbrella manufacturers produce no other products; approximately a fifth of them produce umbrellas other than rain umbrellas. Approximately a third of the domestic producers import low-priced umbrellas, chiefly from Japan, and several producers sell imported umbrellas which they buy from importers.

Only 32 producers, accounting for some two-thirds of the estimated production of umbrellas in recent years, returned questionnaires with

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<sup>1/</sup> The U.S. Bureau of the Census reports that in 1954 there were 140 concerns producing umbrellas, umbrella frames, and canes; in 1958 there were 123 such concerns, of which more than half had fewer than 20 employees.

data that could be incorporated in the tabulations on production, sales, and employment presented in the appendix of this report. 1/ The information supplied by these producers has been used throughout this report in estimating the composition of U.S. production by type, size, and price range. The Commission has considerable reservation, however, concerning the adequacy of this information for measuring annual variations in sales, employment, and profits. The data reported on the questionnaires indicate that the percentage of the estimated production of umbrellas accounted for by the respondents has declined since 1960.

Umbrella frames.--In 1954-56 five domestic concerns produced umbrella frames, and in 1957 four did so. Currently three concerns manufacture umbrella frames; their plants are located at Newark, New Jersey, New York City, and Philadelphia. 2/

U.S. production

Umbrellas.--Data on the aggregate domestic production of umbrellas are not available. Production data for 1960-63 reported to the Commission by 32 producers (table 5), compared with the estimated total production 3/

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1/ Only 26 producers, accounting for about three-fifths of estimated production, furnished usable profit-and-loss data.

2/ There is also a small importer-assembler of frames from which data were received. The data reported by that company were not combined with data reported by other frame producers in this report because publication of the combined data would disclose the operations of that company.

3/ Data on the production of umbrellas submitted in response to the Commission's questionnaires are incomplete. For the purposes of this report, therefore, it has been assumed that the annual production of umbrellas has closely approximated the domestic consumption of umbrella frames (sales of domestic frames plus imports minus exports). Comparable estimates of the annual production of umbrellas were supplied to the Commission by the petitioners (p. 11 of their petition and also p. 11 of the transcript of the hearing).

are as follows:

Year	Estimated umbrella production	Production reported by 32 producers	
		Quantity	Percent of estimated total
	<u>1,000</u> <u>dozen</u>	<u>1,000</u> <u>dozen</u>	
1960-----	609	455	75
1961-----	701	466	67
1962-----	814	523	64
1963-----	704	461	65

The estimated domestic production of umbrellas rose from slightly more than 600,000 dozen per year in 1959-60 to 814,000 dozen in 1962 but declined to 704,000 dozen in 1963, when consumption also declined.

In view of the diminishing share of the U.S. output of umbrellas accounted for by the data obtained by questionnaire, the dollar value of sales thus available (table 6) are not deemed to reflect adequately the aggregate sales experience of umbrella manufacturers.

Approximately 68 percent of the umbrellas produced in 1960-63 by firms reporting data to the Commission consisted of women's umbrellas (table 5); nearly 17 percent of the total were men's umbrellas; and about 10 percent were children's. The remainder consisted of clamp-on and of golf and doormen's umbrellas and sunshades. Data collected by the Commission for those years (1960-63) indicate that about 35 percent of the total were women's umbrellas having 10 ribs 19 or 20 inches in length; an additional 25 percent, also women's umbrellas, had 16 ribs 18 or 19 inches in length. Most of the remaining women's umbrellas had folding or telescopic frames. The domestic production of men's

umbrellas was about evenly divided between those having self-opening frames and those of other types, while most of the children's umbrellas had ribs 15 inches to 17 inches in length.

Data obtained from the questionnaires suggest that about 86 percent of the umbrellas sold by domestic manufacturers during 1960-63 were assembled completely (except for the frame) in their own plants; about 10 percent of them were made from imported bases to which handles had been added; and about 4 percent were imported completely finished (percentages computed from data in table 6).

About 23 percent of the men's domestically produced umbrellas sold by the 32 plants were sold for \$25 or less per dozen; 22 percent were sold at prices ranging from \$25 to \$32 per dozen; 37 percent from \$32 to \$43; and the remaining 18 percent at more than \$43 per dozen (table 7). About 5 percent of the women's domestic umbrellas were sold at \$9 or less per dozen; 10 percent were sold at prices ranging from \$9 to \$17 per dozen; about 34 percent, from \$17 to \$23; 23 percent from \$23 to \$30; and the remaining 28 percent at more than \$30.

Department stores constituted a market for about 60 percent of producers' sales in 1963. Other important outlets were chain stores other than chain department stores (12 percent), specialty shops (10 percent), and wholesalers (7 percent).

Umbrella frames.--The U.S. production of umbrella frames increased annually from 553,000 dozen in 1960 to 739,000 dozen in 1962, but declined to 694,000 dozen in 1963 (table 4).

Data relating to sales of umbrella frames were obtained by the Commission through questionnaires from all the domestic producers. The quantity of frames sold in 1950 and 1954-63 by the major producers, which accounted for virtually all of the domestic production, are shown in table 4. The value of annual sales (all products) by domestic establishments producing umbrella frames has varied irregularly in recent years. The value of such sales in 1962 was higher than in either of the 2 preceding years, but in 1963 it was about 7 percent smaller than the 1960-61 average. The decline, however, is attributable almost exclusively to decreased sales of products other than umbrella frames.

#### U.S. imports

In 1963 approximately 100 concerns (including many domestic producers) imported umbrellas; 15 concerns imported umbrella frames. Almost all of these importers were located in New York City and vicinity. From partial returns supplied by respondents to the Commission's questionnaire, it is estimated that between 30 and 40 percent of the umbrellas imported in 1963 went either directly or indirectly to domestic producers of umbrellas for resale. Most of these imports consisted of finished umbrellas, and about two-thirds of them were imported directly by the producers; the remainder were purchased by producers from importers. On the other hand, somewhat more than half of the imports of umbrella frames during 1961-63 were entered by umbrella producers; the remainder were entered by importers and sold to umbrella producers.

Umbrellas.--Following the imposition of an export quota by Japan,<sup>1/</sup> imports of umbrellas (including umbrella bases) decreased from 723,000 dozen in 1959 to 504,000 dozen in 1960 and to 385,000 dozen in 1961. They rose to 551,000 dozen in 1962, then declined to 461,000 dozen in 1963. In the first 5 months of 1964 imports were 34 percent smaller than in the comparable period of 1963.

Since shortly after World War II, Japan has been the major supplier of U.S. imports of umbrellas. In the years 1960 and 1961 it supplied more than 90 percent of the total; in 1962 and 1963 it supplied 83 and 68 percent of the total, respectively. In 1963 Hong Kong supplied 30 percent. Italy has been the third largest supplier in recent years; West Germany and the United Kingdom have supplied relatively small quantities (table 8).

The umbrellas coming from Japan and Hong Kong have much lower unit foreign values than those from other suppliers. In 1963 the foreign values of those from Japan and Hong Kong averaged \$8.52 and \$4.28 per dozen, respectively, while the corresponding values for imports from Italy and West Germany were \$28.91 and \$38.97 per dozen, respectively. Part of the disparity is accounted for by differences in the types and qualities of the umbrellas imported, but it is evident that for closely comparable types the least expensive umbrellas have come from Hong Kong and Japan.

Imported umbrellas and bases have consisted predominantly of women's umbrellas. From the available data, it is estimated that in 1963 nearly

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<sup>1/</sup> See the section on the Japanese export quota.

two-thirds of the imports were women's umbrellas, more than a fifth consisted of men's umbrellas, and less than a seventh, of children's. <sup>1/</sup> By comparison, in 1963 about two-thirds of the domestic production consisted of women's umbrellas, and less than a fifth, of men's. About a tenth of production was of children's umbrellas; the remainder consisted primarily of clamp-on and other types of umbrellas.

In recent years, imports of women's umbrellas have declined relative to imports of other types; accordingly men's umbrellas have accounted for an increasing share of the total (table 9). During 1960-63 women's umbrellas with folding or telescopic frames supplied a declining share of imports; women's 10-rib umbrellas were the type imported in greatest number. Imports of the men's self-opening type also became increasingly important. During 1960-63 the foreign value of the imported sunshades (parasols) was equivalent to less than 5 percent of the total foreign value of imported umbrellas and sunshades. The sunshades were imported largely by importers other than producers; the average foreign value of such imports was about \$5.00 per dozen.

In 1963, sales of men's imported umbrellas were concentrated in the wholesale price range of \$25.00 or less per dozen (table 7). It is estimated that about nine-tenths of such imports fell within this range; apparently most of these were further concentrated in a wholesale price range between \$14 and \$25 per dozen. Nearly all of

<sup>1/</sup> The average unit foreign value of the 1960-63 imports of children's umbrellas with ribs less than 15 inches in length was about \$2.50 per dozen, indicating that a substantial proportion, if not all, of them were probably sold as toys or novelties, although they provided some protection against rainfall.

the remainder were sold at prices ranging between \$25 and \$32 per dozen. By comparison, probably little more than a fifth of the men's domestically produced umbrellas were sold within the wholesale price range of \$25 or less per dozen, and more than half, at prices of \$32 or more per dozen.

The women's imported umbrellas were generally sold at wholesale prices lower than those shown for men's umbrellas (table 7). It appears that in 1963 about a third of them were sold at \$9 or less per dozen. Some two-fifths of the total were sold at prices ranging between \$9 and \$17 per dozen, and about a fourth, at prices ranging between \$17 and \$23 per dozen. Approximately a sixth of the women's umbrellas produced domestically, on the other hand, were sold at \$17 or less per dozen, and nearly a third, at prices ranging between \$17 and \$23. The remaining half of domestic production sold at more than \$23 per dozen.

From the incomplete data supplied to the Commission, it is estimated that in the year 1963 retail stores other than department stores were the major sales outlets for imports. Importers reported selling about a fifth of their umbrellas to domestic umbrella producers and a similar proportion to jobbers and wholesalers. Department stores constituted the major sales outlet for domestic umbrellas.

Umbrella frames--Imports of umbrella frames increased from 96,000 dozen in 1959 to 114,000 dozen in 1960 and 143,000 dozen in 1962. They declined, however, to 109,000 dozen in 1963; in the first 5 months of 1964 they were 14 percent greater than during the corresponding period of 1963.

Since 1955 Japan has been by far the major supplier of imported umbrella frames. Austria has furnished most of the remaining imports, and West Germany has supplied a declining proportion (table 10).

Purchases of umbrella frames by the umbrella producers are made directly from the manufacturers or importers of such frames. Information is not available on sales according to price ranges.

Japanese export quotas.--On March 1, 1957, a quota for exports of umbrella frames to the United States was instituted by the Japanese General Merchandise Exporters Association; similarly a quota on exports of umbrellas and umbrella bases to the United States was adopted on February 1, 1959.

On October 1, 1959, the quota on umbrellas and umbrella bases officially came under the control of the Japanese Government and binding on nonmembers of the association by decree of the Ministry of International Trade and Industry. Effective for 1961, the annual export quota on umbrellas was reduced from 500,000 dozen to its present level of 420,000 dozen. The quota applies to umbrellas with metal ribs but excludes (1) those with ribs less than 15 inches long, and (2) those with ribs less than 16 inches long if having eight or fewer ribs. Thus some children's umbrellas, as well as toy umbrellas, are not subject to the export quota.

During the 2 years 1959-60, when the Japanese annual export quota for umbrellas was set at 500,000 dozen umbrellas, U.S. imports from Japan averaged 568,000 dozen annually. For the 3-year period

1961-63, when a quota of 420,000 dozen was in effect, annual imports of umbrellas from Japan averaged 377,000 dozen. <sup>1/</sup>

The quota for umbrella frames, on the other hand, has never been the subject of a Government decree and therefore it is not binding on nonmembers of the association. Currently the annual quota is fixed at 120,000 dozen; originally it applied only to frames valued at \$4 or less per dozen, but was extended in 1962 to include all frames. Since the quota has been in force, the exports of frames from Japan do not appear to have exceeded, in any year, the prescribed limitation. During 1957-62, U.S. imports from Japan averaged about 84,000 dozen annually.

#### Employment

Umbrellas.--As already indicated, responses to the Commission's questionnaire failed to provide comprehensive data for the producers of umbrellas; the data received related to firms which, in the aggregate, accounted for a diminishing share of the umbrellas produced in the United States. In the absence of either official employment statistics or usable data from the producers, it was not possible to measure accurately the variations of employment in the domestic production of umbrellas.

Umbrella frames.--During 1960-63 an average of 433 production and related workers were employed in plants making umbrella frames;

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<sup>1/</sup> Since the definition used to identify umbrellas in the Japanese quota is more restrictive than that used for U.S. imports, and since there is a considerable lag between the time of shipment from Japan and arrival in the United States, these comparisons are of limited significance.

about 80 percent of the total working hours spent by these employees during that period was devoted to making umbrella frames (table 11).

Although domestic production of umbrella frames in both 1962 and 1963 was higher than in other recent years, man-hours of employment in such production have declined sharply over the past decade, indicating a significant increase in output per man-hour. The three firms that produce umbrella frames have increasingly mechanized their production. Largely because of these changes, the output per man-hour increased by 46 percent from 1960 to 1963.

#### Prices

Umbrellas.--Umbrella producers rarely use printed price lists. Because of the many changes from year to year in the types, fabrics, and handles of umbrellas sold, it has not been possible to measure with any assurance of accuracy the changes in the prices received by producers for umbrellas.

Umbrella frames.--In this and in previous investigations, data on producers' prices, (f.o.b. factory) for the most popular models of umbrella frames were obtained by the Commission from the producers' responses to the Commission's questionnaire. From these prices were constructed the following indexes (1950 = 100),

reflecting changes in the producers' prices of umbrella frames:

<u>Year</u>	<u>Price relative</u>
1956-----	80
1957-----	76
1958-----	67
1959-----	65
1960-----	65
1961-----	65
1962-----	64
1963-----	65

Since somewhat general specifications (length, type, and number of ribs) had to be used for pricing the frames, minor changes probably occurred in the detailed specifications which contributed to the lower prices shown for recent years. Producers' prices have remained almost constant since 1959.

Profit-and-loss experience of domestic producers

The profit-and-loss experience of the producers of umbrella frames cannot be shown separately without revealing confidential data. Combined data for 26 producers of umbrellas accounting in 1960-63 for 60 to 65 percent of U.S. production, and two frame producers accounting for well over half of U.S. production of frames are shown in table 12.

The sales and profits of the 28 producers combined increased from 1960 through 1962 and, though somewhat lower in 1963, were still above those in 1960. The ratio of officers' salaries to net sales rose from 3.4 percent in 1960 to 4.0 percent in 1963.

**Appendix**

Table 1.--U.S. rates of duty in the Tariff Schedules of the United States  
(TSUS) for umbrellas and parts, effective Aug. 31, 1963

TSUS No.	Rate reference No.	Description	Rate of duty <u>1/</u>	
			1	2
751.05:	1	Umbrellas-----	20% ad val.	40% ad val.
:	:	Parts of umbrellas, walking	:	:
:	:	sticks, canes, seat	:	:
:	:	sticks, whips, and riding	:	:
:	:	crops:	:	:
751.15:	2	Handles and sticks of wood,	:	:
:	:	valued not over \$2.50 per	:	:
:	:	dozen-----	24% ad val.	40% ad val.
:	:	Other:	:	:
751.20:	3	Of metal-----	30% ad val.	50% ad val.
751.25:	4	Not of metal-----	16% ad val.	45% ad val.
:	:	:	:	:

1/ The rates in col. 1 apply to all products except (a) Philippine articles, which receive preferential treatment, (b) products of most Communist-controlled countries, which are dutiable at the rates shown in col. 2, and (c) certain products of insular possessions.

Table 2.--U.S. rates of duty under the Tariff Act of 1930 for umbrellas and parts, June 18, 1930-Aug. 30, 1963

Tariff paragraph and description	Rate reference No.	Statutory rate effective June 18, 1930:	Trade-agreement modification	
			Rate	Effective date
Par. 342:				
Parasol and umbrella ribs and stretch- ers, wholly or in chief value of iron, steel, or other metal, in frames or otherwise, and tubes for umbrellas, wholly or partly finished.	3	60% ad val.	30% ad val.	Oct. 1, 1951. <u>1/</u>
Par. 1554:				
Parasols, sunshades, and umbrellas, covered with mate- rial other than lace or paper, not appliqued or em- broidered.	1	40% ad val.	20% ad val.	May 30, 1950. <u>1/</u>
Handles and sticks for parasols, sunshades, um- brellas, and walking canes:				
Wholly or in chief value of com- pounds of cellu- lose.	4	40% ad val.	20% ad val. 18% ad val. 16% ad val.	Sept. 10, 1955. July 1, 1962. July 1, 1963. <u>1/</u>
Wholly or in chief value of synthe- tic resin.	4	75% ad val.	37½% ad val. 33½% ad val. 30% ad val.	Oct. 19, 1951. July 1, 1962. July 1, 1963. <u>1/</u>

See footnote at end of table.

Table 2.--U.S. rates of duty under the Tariff Act of 1930 for umbrellas and parts, June 18, 1930-Aug. 30, 1963--Continued

Tariff paragraph and description	Rate reference No.	Statutory rate effective June 18, 1930:	Trade-agreement modification	
			Rate	Effective date
Par. 1554--Continued	:	:	:	:
Handles and sticks	:	:	:	:
for parasols,	:	:	:	:
etc.--Continued	:	:	:	:
Wholly or in chief	:	:	:	:
value of wood	:	:	:	:
and valued per	:	:	:	:
dozen:	:	:	:	:
Under \$2.50-----	2	40% ad val.	30% ad val.	Sept. 10, 1955.
	:	:	27% ad val.	July 1, 1962.
	:	:	24% ad val.	July 1, 1963. <u>1/</u>
\$2.50 or more----	4	40% ad val.	20% ad val.	May 30, 1950.
	:	:	18% ad val.	July 1, 1962.
	:	:	16% ad val.	July 1, 1963. <u>1/</u>
Other-----	4	40% ad val.	20% ad val.	May 30, 1950.
	:	:	18% ad val.	July 1, 1962.
	:	:	16% ad val.	July 1, 1963. <u>1/</u>
	:	:	:	:

1/ The concession effective on this date is reflected in the Tariff Schedules of the United States that became effective Aug. 31, 1963; see in table 1 the col. 1 rate identified by the rate reference numbers shown in this table.

Table 3.-- Umbrellas: U.S. production, imports for consumption, exports of domestic merchandise, and apparent consumption, 1950-63

Year	Domestic production <sup>1/</sup>	Imports	Exports	Apparent consumption	Ratio of imports to consumption
	<u>1,000</u> <u>dozen</u>	<u>1,000</u> <u>dozen</u>	<u>1,000</u> <u>dozen</u>	<u>1,000</u> <u>dozen</u>	<u>Percent</u>
1950-----	834	59	27	866	7
1951-----	<sup>2/</sup>	115	20	<sup>2/</sup>	<sup>2/</sup>
1952-----	<sup>2/</sup>	116	23	<sup>2/</sup>	<sup>2/</sup>
1953-----	<sup>2/</sup>	138	28	<sup>2/</sup>	<sup>2/</sup>
1954-----	735	140	25	850	16
1955-----	868	190	18	1,040	18
1956-----	923	299	16	1,206	25
1957-----	769	333	16	1,086	31
1958-----	703	551	13	1,241	44
1959-----	606	723	8	1,321	55
1960-----	609	504	8	1,105	46
1961-----	701	385	12	1,074	36
1962-----	814	<sup>3/</sup> 551	<sup>3/</sup> 8	<sup>3/</sup> 1,357	<sup>3/</sup> 41
1963-----	704	<sup>3/</sup> 461	<sup>3/</sup> 6	<sup>3/</sup> 1,159	<sup>3/</sup> 40

<sup>1/</sup> Data on production are not available. The data shown here were derived by deducting exports of umbrella frames from the sum of the number of frames sold by domestic producers and the number of frames imported. The data thus obtained represent the approximate U.S. consumption of umbrella frames and hence the approximate U.S. production of umbrellas.

<sup>2/</sup> Not available

<sup>3/</sup> Preliminary.

Source: Sales of domestic frames reported by producers; imports and exports compiled from official statistics of the U.S. Department of Commerce.

Table 4.--Umbrella frames: U.S. production, sales, imports for consumption, exports of domestic merchandise, and apparent consumption, 1950-63

Year	Production	Sales	Imports	Exports	Apparent consumption 1/	Ratio of imports to consumption
	1,000 dozen	Percent				
1950-----	894	866	8	41	833	1
1951-----	2/	2/	10	35	2/	2/
1952-----	2/	2/	16	36	2/	2/
1953-----	2/	2/	39	52	2/	2/
1954-----	746	763	35	63	735	5
1955-----	846	865	60	57	868	7
1956-----	715	629	344	50	923	37
1957-----	652	680	134	45	769	17
1958-----	629	3/ 629	122	4/ 48	703	17
1959-----	558	3/ 558	96	4/ 48	606	16
1960-----	553	543	114	4/ 48	609	19
1961-----	615	629	120	4/ 48	701	17
1962-----	739	719	5/ 143	4/ 48	5/ 814	5/ 18
1963-----	694	643	5/ 109	4/ 48	5/ 704	5/ 16

1/ Domestic sales plus imports less exports.

2/ Not available.

3/ No data on sales; sales assumed to be the same as production.

4/ Estimated.

5/ Preliminary.

Source: Production and sales reported by producers; imports and exports compiled from official statistics of the U.S. Department of Commerce, except as noted.

Table 5.--Umbrellas: Production by 32 U.S. producers, by types, 1960-63 1/

Type and size	1960		1961		1962		1963	
	Quantity	Percent	Quantity	Percent	Quantity	Percent	Quantity	Percent
	Dozen	of total						
Rain umbrellas and umbrella bases:								
Men's:								
Self-opening	37,017	8.1	40,565	8.7	42,237	8.1	38,330	8.3
Other	38,547	8.5	40,191	8.6	42,325	8.1	37,932	8.2
Women's:								
Folding or telescopic frames	18,657	4.1	18,059	3.9	20,478	3.9	19,059	4.1
Other:								
19 or 20 inches								
x 10 ribs	154,966	34.0	155,421	33.4	173,717	33.2	167,402	36.4
x 16 ribs	131,415	28.9	134,851	28.9	140,160	26.8	120,114	26.1
Other	8,037	1.8	9,866	2.1	10,967	2.1	8,303	1.8
Children's:								
Rib 15 inches and 17 inches	41,704	9.2	43,843	9.4	51,476	9.8	49,827	10.8
Other	3,074	.7	2,993	.6	2,731	.5	2,292	.5
Clamp-on	19,000	4.2	17,518	3.8	18,190	3.5	14,625	3.2
Other, including golf and doormen's	2,299	.5	2,791	.6	21,024	4.0	2,667	.6
Total	454,716	100.0	466,098	100.0	523,305	100.0	460,551	100.0
Sunshades reported above:	376	.1	378	.1	868	.2	296	.1
Umbrellas reported above, produced in any part on contract	42,345	9.3	40,377	8.7	47,176	9.0	38,495	8.4
Imported umbrella bases to which handles were added (not in total)	60,568	13.3	63,084	13.5	97,529	18.6	77,576	16.8

1/ The 32 producers accounted for approximately 75 percent of the U.S. production of umbrellas in 1960, for 67 percent in 1961, 64 percent in 1962 and 65 percent in 1963.

Source: Compiled from data supplied the U.S. Tariff Commission by domestic producers.

Table 6.--Sales of umbrellas and other products by 32 U.S. establishments in which umbrellas were manufactured, 1960-63 1/

Description	1960	1961	1962	1963
	Quantity (dozen)			
Rain umbrellas:				
Produced in domestic plants-----	501,326	502,281	534,720	470,277
Imported bases to which handles were added-----	41,603	58,104	61,517	71,470
Imported wholly finished-----	15,577	16,991	24,026	32,078
Total-----	<u>558,506</u>	<u>577,376</u>	<u>620,263</u>	<u>573,825</u>
Sunshades-----	376	378	868	296
	Value (1,000 dollars) <u>2/</u>			
Rain umbrellas:				
Produced in domestic plants-----	\$12,909	\$13,608	\$14,268	\$12,350
Imported bases to which handles were added-----	685	961	1,044	1,259
Imported wholly finished-----	289	374	420	587
Total-----	<u>13,883</u>	<u>14,943</u>	<u>15,732</u>	<u>14,195</u>
Sunshades-----	138	121	134	115
All other products-----	178	253	268	410
Total, all products-----	<u>14,199</u>	<u>15,317</u>	<u>16,134</u>	<u>14,721</u>
	Unit value (per dozen) <u>2/</u>			
Rain umbrellas:				
Produced in domestic plants-----	\$25.75	\$27.09	\$26.68	\$26.26
Imported bases to which handles were added-----	16.47	16.54	16.97	17.62
Imported wholly finished-----	18.53	22.00	17.48	18.30
Average-----	<u>24.86</u>	<u>25.88</u>	<u>25.36</u>	<u>24.74</u>
Sunshades-----	368.44	320.40	154.37	386.83

1/ The 32 producers accounted for approximately 75 percent of the U.S. production of umbrellas in 1960, for 67 percent in 1961, 64 percent in 1962, and 65 percent in 1963.

2/ The value of sales is net sales (i.e., gross sales, f.o.b. manufacturer's point of shipment, less discounts, allowances, and value of returned goods).

Source: Compiled from data supplied the U.S. Tariff Commission by domestic producers.

Table 7.--Umbrellas: Percentage distribution of sales of men's and women's domestic and imported rain umbrellas in the United States, by wholesale price ranges, 1963

(Percent of quantity)

Type and wholesale price range per dozen	Imported umbrellas sold by--		Domestic umbrellas
	Producer- <sup>1/</sup> importers	Other importers <sup>1/</sup>	
Men's umbrellas:			
\$14 and under-----)		( 8.9 )	
\$14.01 to \$18-----)	76.1	( 44.6 )	23.2
\$18.01 to \$25-----)		( 41.3 )	
\$25.01 to \$32-----)	20.2	4.9	21.6
\$32.01 to \$43-----)	2.7	.3	37.2
Over \$43-----)	1.0		18.0
Total-----)	100.0	100.0	100.0
Women's umbrellas:			
\$9 and under-----)	5.8	48.0	4.9
\$9.01 to \$13-----)	56.6	( 14.4 )	10.0
\$13.01 to \$17-----)		( 13.7 )	
\$17.01 to \$23-----)	26.4	23.0	33.8
\$23.01 to \$30-----)	7.7	.6	23.4
Over \$30-----)	3.5	.3	27.9
Total-----)	100.0	100.0	100.0

<sup>1/</sup> The 75 importers (including 14 producers) accounted for approximately 63 percent of the U.S. imports of umbrellas in 1963.

Source: Compiled from data supplied the U.S. Tariff Commission by domestic producers and importers.

Table 8.--Umbrellas: U.S. imports for consumption, by principal sources, 1960-63 and January-May 1963 and 1964

Country	1960	1961	1962 <sup>1/</sup>	1963 <sup>1/</sup>	Jan.-May 1963 <sup>1/</sup>	Jan.-May 1964 <sup>1/</sup>
Quantity (dozen)						
Japan-----	462,182	359,084	457,822	313,906	181,830	100,174
Hong Kong--	29,107	14,675	81,838	139,214	71,386	58,803
Italy-----	9,263	9,118	9,064	6,502	2,463	1,592
United Kingdom--	855	175	626	254	43	38
West Germany-----	2,210	1,832	797	400	243	96
All other--	862	598	648	544	231	8,043
Total--	504,479	385,482	550,795	460,820	256,196	168,746
Foreign value						
Japan-----	\$2,477,666	\$2,167,997	\$3,696,333	\$2,675,195	\$1,551,904	\$799,336
Hong Kong--	77,769	38,012	322,796	595,847	272,556	257,401
Italy-----	169,474	190,376	240,384	187,946	60,627	44,312
United Kingdom--	23,795	10,683	15,928	19,504	3,800	2,771
West Germany-----	49,652	33,342	40,952	15,586	8,717	4,336
All other--	19,044	15,978	21,234	19,489	3,075	12,800
Total--	2,817,400	2,456,388	4,337,627	3,513,567	1,900,679	1,120,956
Unit value (per dozen)						
Japan-----	\$5.36	\$6.04	\$8.07	\$8.52	\$8.53	\$7.98
Hong Kong--	2.67	2.59	3.94	4.28	3.82	4.38
Italy-----	18.30	20.88	26.52	28.91	22.62	27.83
United Kingdom--	27.83	61.05	25.44	76.79	88.37	72.92
West Germany-----	22.47	18.20	51.38	38.97	35.87	45.17
All other--	22.09	26.72	32.77	35.83	13.31	1.59
Average--	5.58	6.37	7.88	7.62	7.42	6.64

<sup>1/</sup> Preliminary.

Source: Compiled from official statistics of the U.S. Department of Commerce.

Table 9.--Umbrellas: Percentage distribution by types and sizes of imported rain umbrellas (including bases) entered into the United States by 75 importers, 1960-63 <sup>1/</sup>

(Percent of quantity)				
Type and size of rain umbrellas	1960	1961	1962	1963
Imports entered by producer-importers				
Men's:				
Self-opening-----	12.2	16.1	15.9	21.9
Other-----	2.6	2.6	3.5	4.8
Women's:				
Folding or telescopic frames-----	2.9	4.0	1.5	2.0
Other:				
19 or 20 inches x 10 ribs-----	40.6	39.9	41.8	35.1
18 or 19 inches x 16 ribs-----	29.4	21.1	23.0	20.3
Other-----	5.3	8.5	7.0	9.1
Children's:				
Rib 15 inches and 17 inches-----	7.0	7.6	6.9	6.4
Other-----	-	.2	.1	.4
Other (including golf and doormen's)-----	-	-	.3	-
Total-----	100.0	100.0	100.0	100.0
Imports entered by other importers				
Men's:				
Self-opening-----	16.3	18.0	16.5	17.9
Other-----	3.9	8.1	5.1	3.2
Women's:				
Folding or telescopic frames-----	20.2	15.9	9.1	11.6
Other:				
19 or 20 inches x 10 ribs-----	16.7	17.7	27.2	27.3
18 or 19 inches x 16 ribs-----	12.0	13.3	14.6	9.0
Other-----	16.4	14.8	13.3	11.6
Children's:				
Rib 15 inches and 17 inches-----	2.7	8.8	5.1	6.7
Other-----	8.8	3.0	5.9	8.9
Other (including golf and doormen's)-----	3.0	5.4	3.2	3.8
Total-----	100.0	100.0	100.0	100.0

<sup>1/</sup> The 75 importers (including 14 producers) accounted for approximately 50 percent of the U.S. imports of umbrellas in 1960, 59 percent in 1961, 73 percent in 1962, and 63 percent in 1963.

Source: Compiled from data supplied the U.S. Tariff Commission by domestic producers and importers.

Table 10.--Umbrella frames: U.S. imports for consumption, by principal sources, 1960-63 and January-May 1963 and 1964

Country	1960	1961	1962 <sup>1/</sup>	1963 <sup>1/</sup>	Jan.-May 1963 <sup>1/</sup>	Jan.-May 1964 <sup>1/</sup>
Quantity (dozen)						
Japan-----	76,409	88,572	110,251	74,458	30,781	39,555
Austria-----	26,109	26,289	27,562	22,104	8,435	4,851
West Germany----	11,677	4,351	3,325	2,072	1,011	1,238
United Kingdom--	180	423	982	669	306	149
All other-----	-	-	708	9,925	1,314	1,910
Total-----	114,375	119,635	142,828	109,228	41,847	47,703
Foreign value						
Japan-----	\$230,542	\$251,177	\$374,186	\$245,610	\$113,824	\$107,162
Austria-----	144,091	131,009	135,974	118,802	41,347	34,579
West Germany----	72,725	31,885	42,775	20,756	9,330	15,117
United Kingdom--	2,084	3,571	6,807	6,806	3,373	1,518
All other-----	-	-	3,799	24,393	4,284	3,900
Total-----	449,442	417,642	563,541	416,367	172,158	162,276
Unit value (per dozen)						
Japan-----	\$3.02	\$2.84	\$3.39	\$3.30	\$3.70	\$2.71
Austria-----	5.52	4.98	4.93	5.37	4.90	7.13
West Germany----	6.23	7.33	12.86	10.02	9.23	12.21
United Kingdom--	11.58	8.44	6.93	10.17	11.02	10.19
All other-----	-	-	5.37	2.46	3.26	2.04
Average----	3.93	3.49	3.95	3.81	4.11	3.40

<sup>1/</sup> Preliminary.

Source: Compiled from official statistics of the U.S. Department of Commerce.

Table 11.--Number of employees and output of 32 umbrella producers and 3 umbrella-frame producers, and man-hours worked by their production and related workers, 1960-63 <sup>1/</sup>

Item	1960	1961	1962	1963
Umbrellas:				
Average number of workers employed:				
All persons-----	1,452	1,449	1,351	1,257
Production and related workers:	1,303	1,296	1,210	1,126
Man-hours worked by production and related workers:				
On all products--	2,349,899	2,333,333	2,319,987	2,076,936
On umbrellas-----	1,699,887	1,706,137	1,793,073	1,634,211
Output of umbrellas:				
Total-----dozen--	454,716	466,098	523,305	460,551
Per man-hour unit--	3.2	3.3	3.5	3.4
Umbrella frames:				
Average number of workers employed:				
All persons-----	515	465	508	472
Production and related workers:	456	406	451	418
Man-hours worked by production and related workers:				
On all products--	856,846	779,627	929,761	791,955
On umbrella frames-----	743,294	603,846	754,145	642,613
Output of umbrella frames:				
Total-----dozen--	552,558	614,983	739,006	693,827
Per man-hour unit--	8.9	12.2	11.8	13.0

<sup>1/</sup> The 3 frame producers accounted for virtually all of the domestic production in 1960-63; the 32 umbrella producers accounted for approximately 75 percent of the U.S. production in 1960, 67 percent in 1961, 64 percent in 1962, and 65 percent in 1963.

Source: Compiled from data supplied the U.S. Tariff Commission by domestic producers.

Table 12.--Profit-and-loss experience of U.S. establishments <sup>1/</sup> producing umbrellas and parts (except handles), 1960-63

Year	Number of concerns showing losses	Net sales	Net operating profit		Salaries paid to officers <sup>2/</sup>	
			Amount	Ratio to net sales	Amount	Ratio to net sales
		<u>1,000</u> dollars	<u>1,000</u> dollars	Percent	<u>1,000</u> dollars	Percent
1960-----	8	18,155	5	3/	621	3.4
1961-----	4	19,020	428	2.3	663	3.5
1962-----	3	20,011	491	2.5	759	3.8
1963-----	7	18,664	322	1.7	751	4.0

<sup>1/</sup> Includes 26 umbrella producers accounting in 1960-63 for 60-65 percent of the estimated U.S. umbrella production, and 2 producers accounting for well over half of U.S. umbrella-frame production.

<sup>2/</sup> Six of the concerns did not pay salaries to their officer-stockholders. Most of the officers are stockholders.

<sup>3/</sup> Less than 0.05 percent.

Source: Compiled from data supplied the U.S. Tariff Commission by domestic producers.

