



United States International Trade Commission

# Budget Justification

Executive Summary  
Fiscal Year 2026



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## Budget Highlights

For FY 2026, the Commission requests \$134 million to carry out our mission and functions. The request is required to sustain the human capital investments we have made in FY 2024 and the first part of FY 2025 and must continue to make during the remainder of FY 2025 to achieve our staffing goals. The volume and complexity of our workload demand a challenging level of effort by our current number of staff. In FY 2024, we continued a long-overdue hiring initiative that aims to provide staffing levels commensurate with our workload. Our FY 2025 staffing goal is to have an average staffing level (i.e., full-time equivalents, or FTE) of 437. As of mid-January 2025, our onboard staffing level is 430, with vacancy rates as high as 17 percent in offices responsible for statutory workload. Our hiring initiative is focused on filling the most critical positions necessary to accomplish the Commission's mission and mitigate risks, as determined by a data-driven and risk-informed analysis performed by the Human Capital Committee and Performance Management and Strategic Planning Committee.

The request also provides resources for IT investments needed to continuously advance the security and capabilities of our IT infrastructure, continue timely equipment lifecycle replacements, improve web-based applications, and re-engineer the Harmonized Tariff Schedule of the United States (HTS) to increase the efficiency of implementing tariff changes and improve accessibility and functionality for users. The request also ensures the availability and accessibility of our public-facing IT systems, as well as ensuring they are in compliance with mandated standards and best practices. Specific FY 2026 IT investments include replacement of end-of-life networking equipment, the continuation of third-party cybersecurity assessments and testing, the migration of file shares to the cloud for redundancy, increased backup capabilities, and the reengineering of the HTS application. Additionally, this request includes funds to continuously optimize and maintain virtual hearing capabilities used to provide a higher level of availability and accessibility to public and intra-governmental customers who use our facilities, such as the Office of the United States Trade Representative.

## Workload Drivers

The Commission continues to experience high and increasing caseload levels in antidumping/countervailing duty (AD/CVD) investigations and a higher number of unfair import investigations as described below, and we have been devoting more resources to conducting or supporting other investigations and Administration initiatives. Due to recent increases in petition filings in import injury investigations coupled with low levels of terminated orders, the average number of instituted and completed investigations has almost doubled in the last decade with commensurate increases in monthly import injury activity levels. In the fourth quarter of FY 2024 the Commission recorded its highest-ever number of active import injury investigations and has sustained these levels through the first quarter of 2025. This workload is expected to remain at high levels due to an increased number of original investigations as well as investigations returning for five-year reviews. Although AD/CVD investigations represent the bulk of import injury activity, the Commission continues to handle litigation-related activity and intermittent global safeguard investigations, such as the fine denier polyester staple fiber investigation.

In FY 2024, our section 337 monthly workload increased, matching the ten-year average, mainly due to a higher number of new complaints being filed compared to the previous year. The settlement rate in section 337 remained low, so we expect the majority of current unfair import investigations to remain before the Commission for longer, terminating either at or close to their target date. With the increase in complaints filed and investigations lasting longer, the overall upward trend of the nearly two decades in new investigations filed year over year continued, and we expect the trend to continue in FYs 2025 and 2026.

At the same time, the increased complexity of factfinding investigations and trade policy support requests have required more research and resources. The increasing number of complex reports with broad scope, such as *Greenhouse Gas Emissions in the Steel and Aluminum Industries* and the *USMCA Automotive Rules of Origin*, have increased requirements for innovative analysis and increased the number of staff and hours devoted to these reports. Hours spent per investigation have risen more than 40 percent over the past five years.

In addition, we have had to amend the HTS more often in recent years to incorporate changes brought about by Administration initiatives. Prior to FY 2018, we would typically publish the HTS two or three times per year. Since FY 2018, we have averaged 17 HTS publications per year. In FY 2024, we published the HTS 10 times and we expect a greater number of publications in FYs 2025 and 2026.

## Program Overview

### Antidumping/Countervailing Duty Investigations and Unfair Import Investigations (Section 337)

The Commission provides a venue for private sector firms and other qualifying entities to bring allegations of certain unfair or injurious trade practices involving imports before an independent, objective, and expert quasi-judicial governmental body. Our trade remedy investigations caseload continues to grow in volume and complexity. In FY 2024, the Commission experienced a surge in the number of AD/CVD petition filings, reaching its second-highest level in the last two decades. The caseload is expected to continue to remain elevated in FYs 2025 and 2026, driven by both original investigations (preliminary and final phases) and the structural increase in reviews of existing orders required every five years after imposition. In FY 2024, new unfair import matters under section 337 rose to be consistent with the ten-year monthly average after a slight decline in activity in FY 2023, and we are expecting caseload to increase in FYs 2025 and 2026.

### AD/CVD Caseload is at Record High Levels

In the last quarter of FY 2024 and continuing into the first quarter of FY 2025, we reached record high levels of active investigations. In FY 2024 we received near-record levels of petitions and anticipate receiving record levels in FY 2025. In FY 2024, 22 petitions were filed under Title VII of the Tariff Act of 1930. In FY 2024, more than one-half of the petitions involved imports from multiple countries. Domestic industries filing petitions in FY 2024 produced a range of products, including various chemical, steel and metal, retail/consumer goods, intermediate products, and aquaculture. Most of the investigations covered chemical (8), retail/consumer (6), and intermediate products (5). Additional investigations covered aquaculture products (1) and steel-related intermediate products (2). Some investigations were notable because of the size and/or complexity of the U.S. industry and market, including corrosion-resistant steel, 2-4-D, and aluminum extrusions. In addition to new investigations, we instituted 37 reviews of existing AD/CVD orders in FY 2024 and anticipate instituting 34 in FY 2025 and 45 in FY 2026. While the number of import injury review activity increased, the amount of safeguard activity was consistent with recent activity levels. In FY 2024, the Commission completed one safeguard monitoring investigation on crystalline silicon photovoltaic cells and modules (solar products) and completed injury and remedy phases for fine denier polyester staple fiber. Overall, the Commission instituted 75

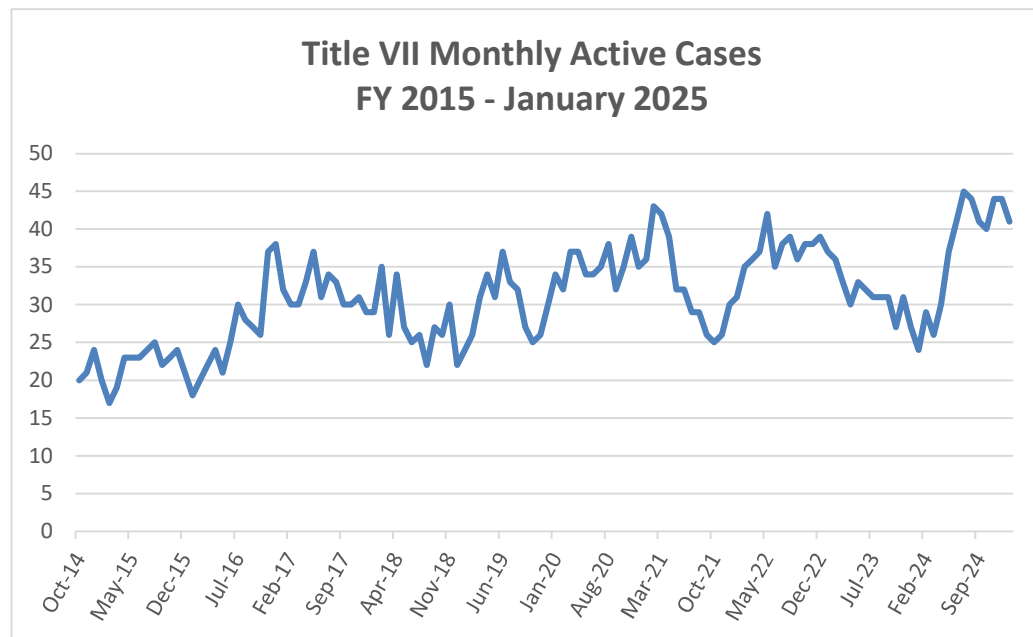
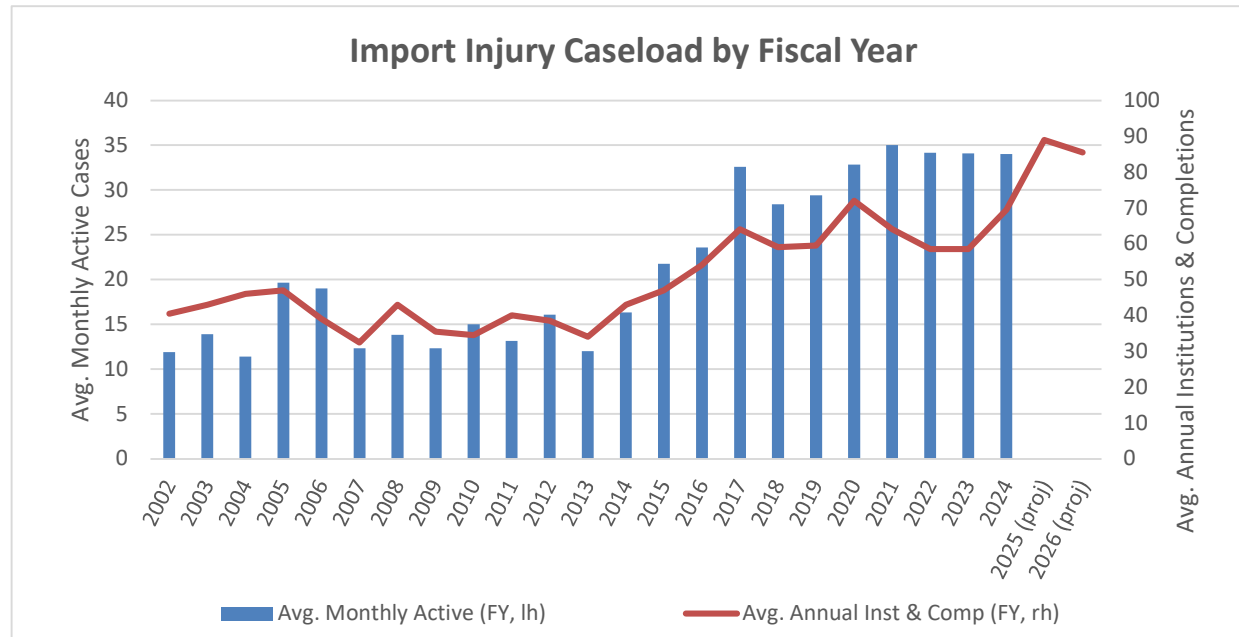
investigations and reviews and completed 64 investigations and reviews in FY 2024. Recent activity reflects an increase in filing activity and continued increases in 5-year review caseload. We anticipate continued high caseload levels; in FY 2025, we anticipate instituting 90 proceedings and completing 88. In FY 2026, we anticipate instituting 84 proceedings and completing 87.

During FY 2024, we continued our efforts to increase the transparency of our proceedings and reduce the burden on participating parties, as well as increase investigative efficiency. We transitioned to more-stable platform for securely collecting questionnaires from external firms and counsel. This new approach substantially improves our ability to efficiently gather information and enables more effective questionnaire processing. We met with stakeholders and used feedback to develop plans for updates to the Commission's import injury website. In FY 2024, we continued development of documentation and standard operating procedures for the Investigations Database System, or IDS, as well as compiling version 2 requirements to continually improve the system.

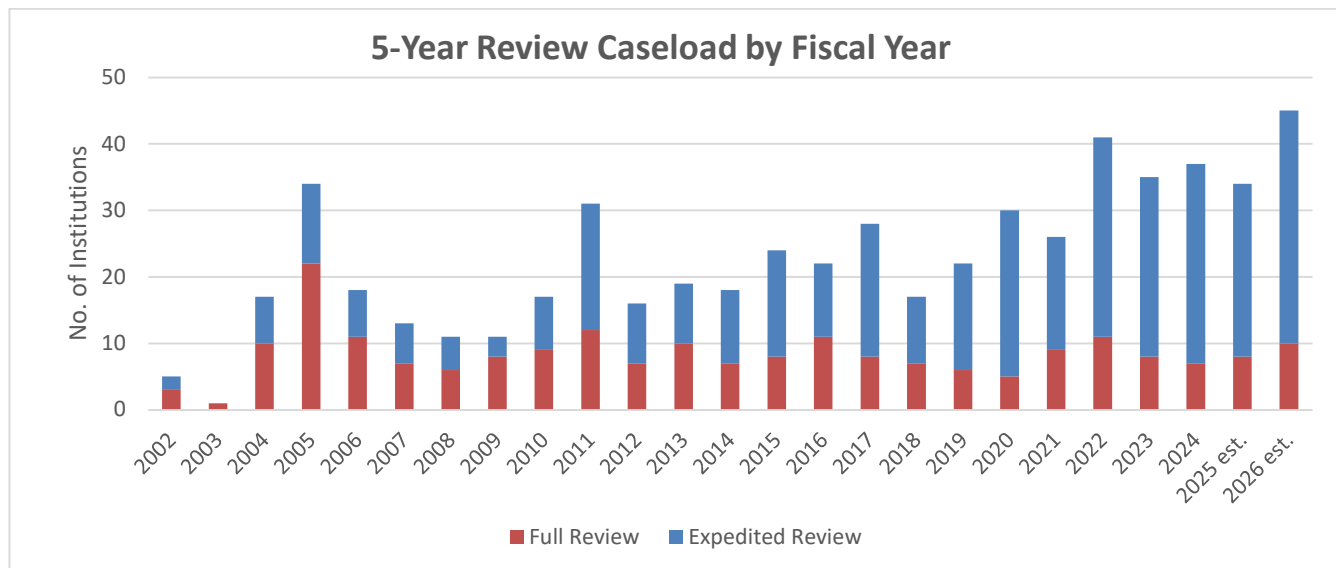
## Import Injury Investigations Caseload

### Instituted and Completed Investigations

	Instituted							Completed						
	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Estimate	FY 2026 Estimate	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Estimate	FY 2026 Estimate
Preliminary Title VII	26	11	10	10	22	26	17	25	12	10	10	21	24	21
Final Title VII	16	23	14	6	13	28	20	20	25	13	9	10	24	24
Other	3	1	0	2	3	2	2	2	2	1	1	4	2	2
Full Review	5	9	11	8	7	8	10	6	5	6	11	9	6	9
Expedited Review	25	17	30	27	30	26	35	16	23	22	33	20	32	31
<b>Total</b>	<b>75</b>	<b>61</b>	<b>65</b>	<b>53</b>	<b>75</b>	<b>90</b>	<b>84</b>	<b>69</b>	<b>67</b>	<b>52</b>	<b>64</b>	<b>64</b>	<b>88</b>	<b>87</b>







## Unfair Import Investigations Caseload Remains High

After peaking in FY 2022, our section 337 workload returned to the ten-year average levels of monthly activity, as the number of new complaints rose in FY 2024 by 30 percent over the previous year. As a result of the increased number of complaints filed last year and the low settlement rate, we anticipate that there will likely be an increased number of active investigations in FY 2025 into FY 2026.

Our proceedings provide for timely resolution of matters involving imported goods alleged to infringe U.S. intellectual property (IP) rights and imports that are involved with other unfair acts or methods of competition, such as trade secret misappropriation, that harm domestic industries. Indeed, it has been reported that nearly a quarter of the patent trials in the United States occur at the Commission. Section 337 authorizes relief in the form of exclusion of infringing or otherwise unfairly traded imports at the border, as well as cease and desist orders that prohibit domestic marketing and sales of the unfairly traded imports. IP-intensive domestic industries that seek relief against unfair imports under section 337 account for a large number of high-wage jobs in U.S. industries that generate significant exports.



The range of technologies covered in these investigations is quite broad, encompassing, among other things, various electronic devices, pharmaceutical and medical devices, transportation-related products, and other consumer goods such as ceiling fans, vaping devices, eyewear products, decorative wood, firearm disassembly thongs, eye cosmetic packaging, storage containers, hair extensions, raised garden beds, fitness devices, and compact wallets. Section 337 investigations typically involve allegations of patent infringement and other unfair acts such as trademark infringement, trade dress infringement, false advertising, and trade secret misappropriation, the latter of which is an area of heightened concern for U.S. companies and Congress.

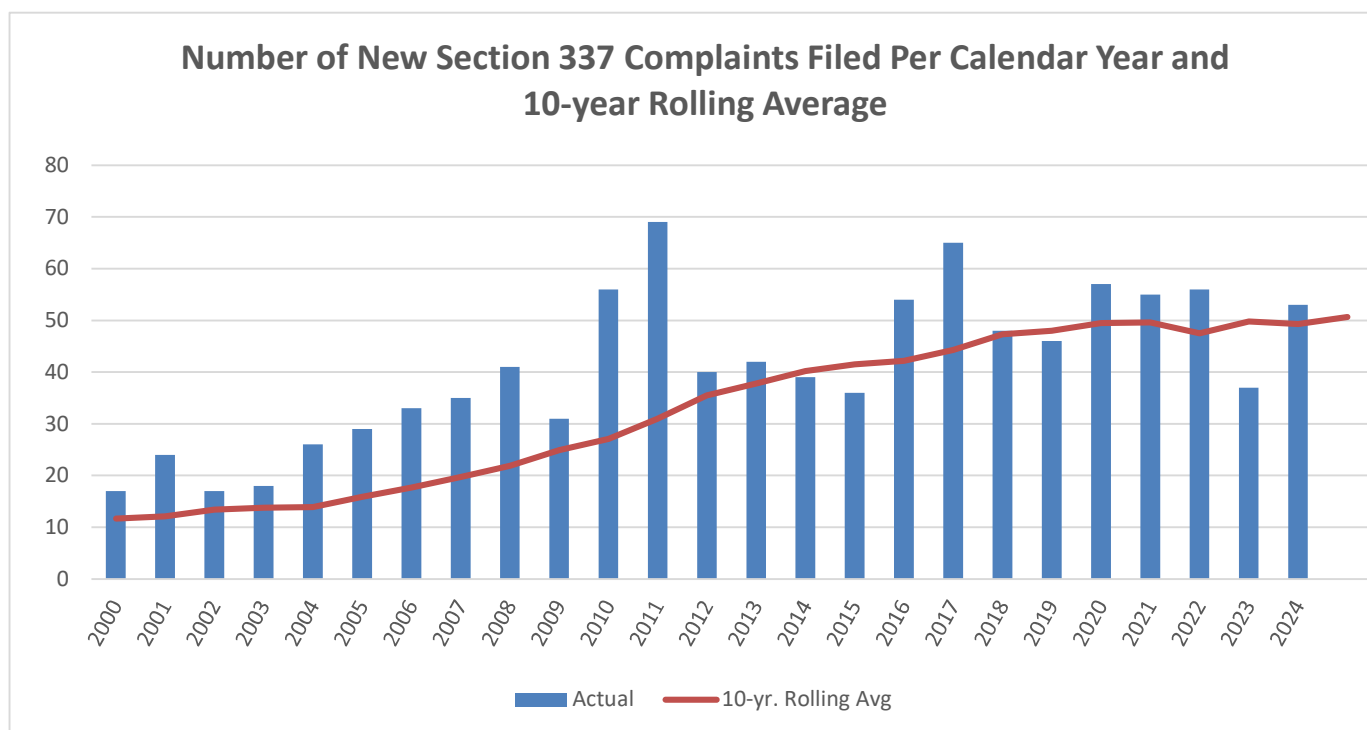
Work is ongoing to ensure that section 337 investigations are completed expeditiously, in line with congressional intent. We continue to build and develop the necessary staff and resources to conduct evidentiary hearings in section 337 investigations, focusing on making the process more efficient and less costly for both litigants and the agency. Our efforts include continued improvements to courtroom infrastructure to streamline technology in the courtrooms to allow for better presentations of evidence and witnesses, whether the witnesses appear remotely or in person, improvements to our rules of procedure, procedural pilot programs, and continued investments in our Electronic Document Information System (EDIS). In FY 2021, we implemented electronic service of public documents through EDIS and bulk downloading of documents in FY 2024. In FY 2025, we plan to implement electronic service of confidential documents through EDIS, and we plan to develop and launch version 2 of the Investigations Database System by the end of calendar year 2025. These technology projects necessitate an adequate level of funding to maintain these important spaces and technology systems that support the Commission's mission.

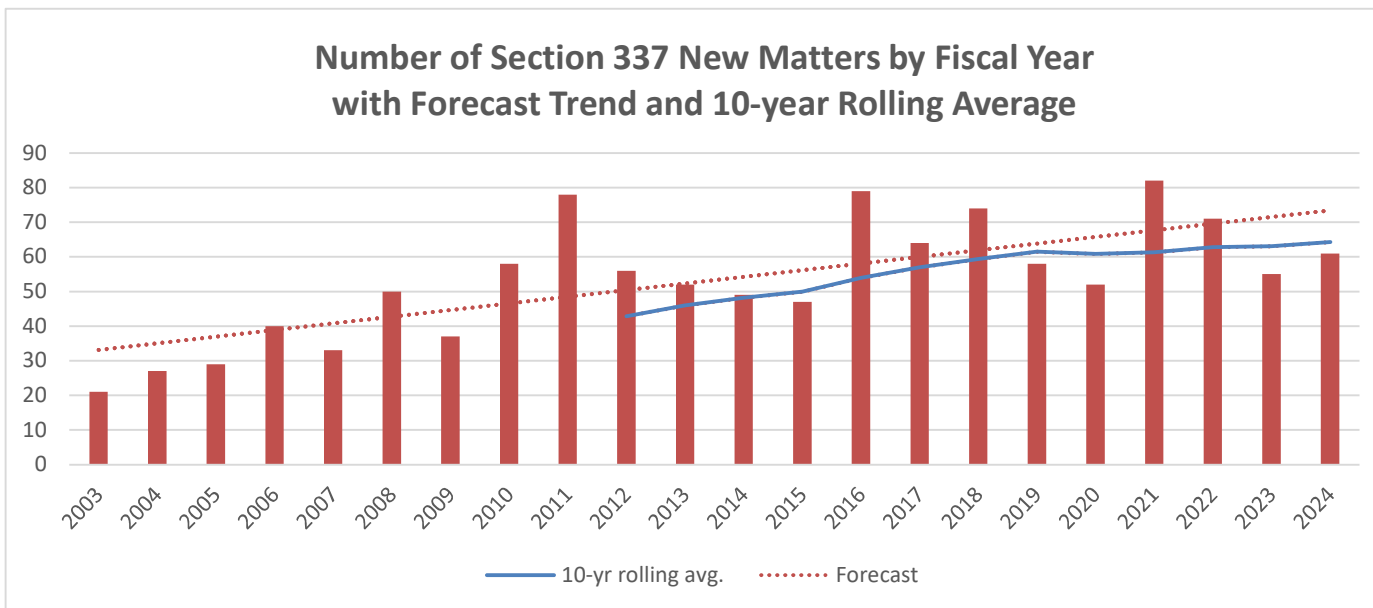
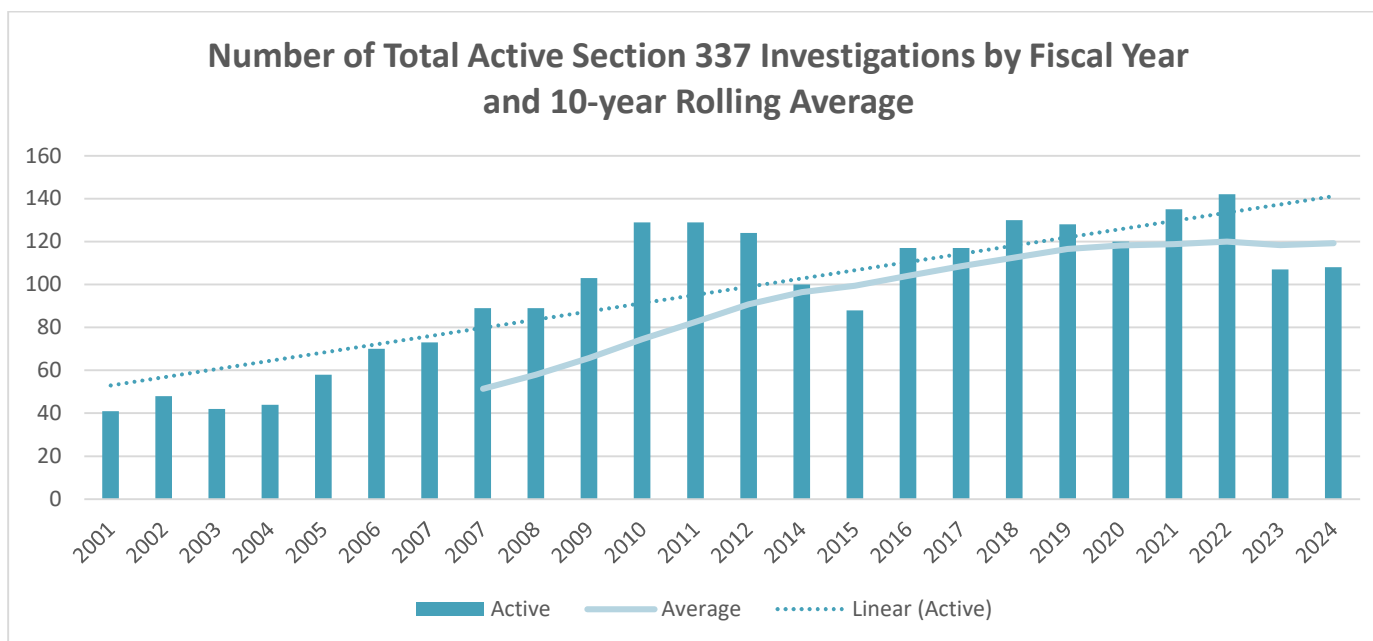
Synergies between EDIS and IDS have helped us to better manage our large volume of investigation-related materials while making our investigative process more transparent. These systems also comply with government Open Data rules, furthering our efforts to make our data more accessible to and usable by other agencies and the public. Funding these types of improvements will help us to address the challenges of resolving section 337 matters expeditiously and will keep the public informed on these matters.

## Unfair Import Investigations Caseload

### Instituted and Completed Original and Ancillary Investigations

Status	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Estimate	FY 2026 Estimate
Instituted	52	82	71	55	61	63	65
Completed	67	64	90	60	46	55	60





## Analysis and Information on Tariffs, Trade, and Competitiveness

The Commission supplies the executive branch, Congress, and the public with objective analyses of significant trade issues. We provide industry and economic research, tariff and trade information, and trade policy support through investigations and other expert advice. Given our independent economic and trade expertise, we offer cutting-edge data and insights that support the development of sound U.S. trade policy. The caseload for industry and economic analysis dipped in FY 2024, but the number of requests is projected to increase in FYs 2025 and 2026.

### We Continue to Develop New Approaches in Our Industry and Economic Analyses

International trade touches nearly all sectors of the U.S. economy. As with section 337 and Title VII investigations, we constantly develop and refine our capabilities to meet requests for increasingly complex analyses in emerging areas of international trade, trade policy, and competitiveness. We gather primary data to provide unique insights into emerging issues, assembling this information via a variety of instruments, including carefully crafted industry surveys.

Our staff also develops new methods to produce high-quality economic analysis to meet analytical priorities relevant to our requestors. During FY 2024, our priority effort for model innovation was improving modeling tools to quantify the effects of trade policy on U.S. workers, regions, and underserved communities. We also created new models to estimate the impact of trade and investment in industries such as motor vehicles, critical minerals, shipbuilding, and solar modules. During FYs 2025 and 2026, we plan to examine risks and vulnerabilities in U.S. supply chains, with a focus on trade in critical minerals and materials; transitions of U.S. workers to new industries and regions; the impact of nontariff measures; the impact of specific provisions in trade agreements; the estimation of greenhouse gas emissions intensity of U.S. industries; and industry competitiveness.

Our work in industry and economic analysis spans a wide variety of issues and responds to both specific requests and areas of potential interest from the President and Congress. A few examples include:

- the performance of U.S. industries in critical supply chains and the effects of global disruptions
- how trade and investment barriers, rules of origin, and standards affect U.S. firms, workers, and consumers
- the possibilities—and pitfalls—of new technologies, industries, and business models

- the intersection of trade and the environment
- assessments of industry competitiveness
- economic analysis of U.S. trade agreements, both proposed and completed, and
- technical support to policymakers during trade negotiations

To effectively support the requests of trade policymakers, we must maintain a staff with expert knowledge and skills to provide relevant and timely insights on trade, investment, and the international competitiveness of U.S. companies in the global marketplace.

Industry and Economic Analysis Investigations Caseload

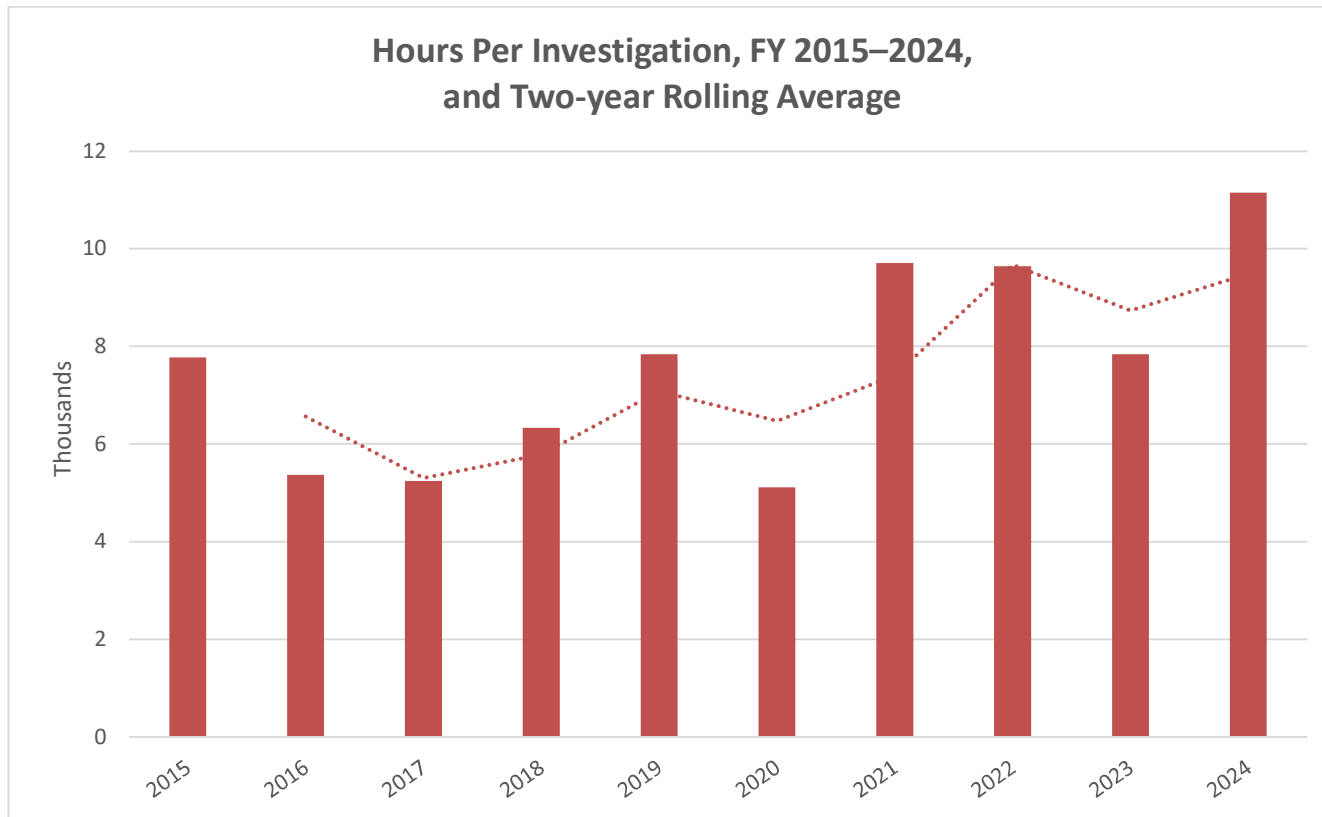
Instituted and Completed Investigations

	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Estimate	FY 2026 Estimate
Instituted	15	9	11	8	6	8	9
Completed	14	9	9	12	7	7	9

Note: Instituted and completed totals include both recurring and non-recurring reports. Investigation totals reflect the historical record available in IDS, which became available in FY 2023, and may be more complete (higher) than reported in earlier years of this report.

Completed Technical Assistance Requests

	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Estimate	FY 2026 Estimate
Completed	122	133	143	114	130	123	117



## The Harmonized Tariff Schedule Needs Technology and Process Improvements

Our work to maintain and update the HTS, as discussed above, also impacts other U.S. agencies, private parties, and other stakeholders. U.S. Customs and Border Protection (CBP) relies upon the HTS for collecting tariff revenues on imported goods. Private firms use the HTS to learn the duties that they will pay on imported goods. U.S. exporters and importers depend on our work in the World Customs Organization to ensure that international nomenclature is harmonized and considers stakeholder interests and changing patterns of trade. Compared to two or three revisions in a typical year, in FY 2024, we prepared and published the HTS 10 times, including the annual Basic Edition in January 2024. Revisions were made to reflect trade actions with respect to, inter alia, modifications to section 301 duties on articles of China resulting from USTR's four-year review of the section 301 investigation of China, granting exclusions to the section 301 duties on articles of China, modifications to Section 232 duties on steel and aluminum products, technical updates to the United States-Korea Free Trade Agreement rules of origin, modification of the quota limit on crystalline silicon photovoltaic cells under the Section 201 solar cells action, and extension of the suspension of Section 232 duties on steel and steel derivative products from Ukraine as well as other conforming or technical amendments.

The HTS provides the foundation for the U.S. trade data maintained by the U.S. Census Bureau (Census), and it enables CBP to manage its trade and enforcement activities. We ensure that the HTS is both accurate and up to date so that it meets the demands for trade and tariff information from Census, CBP, U.S. exporters and importers, the Administration, and policymakers in Congress. Due to the size and openness of the U.S. economy and the volume of U.S. trade, the HTS is the most heavily used tariff schedule in the world. In FY 2024, the HTS was accessed more than 10 million times, more than twice as many visits seen a decade earlier. It is, therefore, critical that the HTS contain accurate and timely information in an accessible and navigable system. To this end, in FY 2024, we evaluated the effectiveness of the current system that supports the HTS and documented deficiencies. We identified the following deficiencies: 1) challenging experience for novice users to find the information they seek in the HTS, 2) difficulty in integrating other types of import information, 3) counterintuitive ability to compare changes in the HTS, 4) lack of flexibility in user experience maintaining HTS information, and 5) outdated technology presents maintenance and security challenges. We concluded that, to most benefit the U.S. government and the private sector that rely upon the HTS, the current system requires a major upgrade and development effort. In FY 2025, we will document requirements for this upgrade, such that development of the upgraded system can commence in FY 2026. The requirements gathering phase will entail engaging with our government partners, stakeholders, and the public. The development phase, in FY 2026, will involve implementing the requirements and iterative testing of the new application with both internal and external stakeholders. This critical work requires significant resources—both



information technology (IT) and subject matter experts. These are the same resources needed to maintain the current HTS, which entails not only updating information in the system, but also supplying expertise in national and international fora to ensure terminology is consistently used, and tariff actions are properly reflected, in the HTS. If the number of tariff-related actions increases in number or complexity in the next few fiscal years, the success of the needed upgrade to the HTS system will be at risk without a commensurate increase in IT and staff resources.

**Number of Harmonized Tariff Schedule (HTS) Publications**

Number of HTS Publications	FY 2018 Actual	FY 2019 Actual	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual
	16	16	31	18	17	14	10

**Trade Policy Support Remains a Key Focus Requiring Deep Expertise**

Congress and the Administration place a high value on our staff’s ability to produce timely, objective, and independent information related to their most urgent issues. We draw heavily on staff in all agency program areas to respond to requests for trade policy support from Congress and the Administration. In FY 2024, we supplied rapid responses on a broad array of issues and topics, such as supporting interagency working groups, assessments of remedies in safeguard investigations, and litigation support in international tribunals. Moreover, behind-the-border issues related to regulation and services trade have required us to refocus our resources, apply new analytic techniques, and develop new trade-related databases. Our staff often provides support to policymakers developing new or revising existing trade programs and policies as well as negotiators working on proposed trade agreements or adjustments to existing agreements. We supply information, expertise, and software-based tools to support U.S. negotiating teams.

**Information Technology Overview**

The USITC continues to advance our technical infrastructure and support by continuously monitoring and maturing our cybersecurity, infrastructure, and software development programs by the timely implementation of relevant guidance, technical advancements, and best business practices. We continue to enhance our cybersecurity program by staying current with mandates and directives, vigorously tracking and remediating vulnerabilities, and actively identifying and defending against threat and attack

vectors utilizing in-house and third-party expertise. Life-cycle replacements of critical network and server infrastructure will continue in FY 2026, as we replace legacy hardware with more efficient variants to not only improve performance and reliability but to also continue to reduce our footprint.

Building off work begun in FY 2025, a complete reengineering of the HTS application is scheduled for FY 2026. This web-based application is the Commission's most accessed system, initiating over 10 million user sessions in FY 2024. This application will incorporate a new technology stack allowing for a future-proof, data-driven system more suitable to address current and future use cases.

In FY 2026, we will continue strengthening our IT security posture by investing in new technologies, processes, and capabilities. In addition to the previously noted activities, planned improvements include the following:

- continued evaluation and maturing of our incident response and intrusion detection processes
- improved flexibility and security in application development utilizing containerization both locally and in the cloud
- enhancements to the Commission's continuous monitoring program
- ongoing participation in the Cybersecurity and Infrastructure Security Agency's Continuous Diagnostics and Mitigation program
- continued use of bug bounty and penetration testing programs to validate and enhance our security posture
- fully realizing the gains in efficiencies and functionality by evaluating the return on investment of IT expenditures and projects

## Remote and Cloud Computing

USITC maintains a secure and modernized remote access solution that ensures high levels of availability and accessibility. Operating a remote datacenter that utilizes multiple service providers, coupled with a mix of cloud- and locally based technologies, USITC is able to exceed its average availability metric across all core applications and systems. We will continue to evaluate the need for additional compute capabilities in the cloud to provide even higher levels of redundancy and performance for remote and local users.

The Commission continues to implement non-proprietary development techniques and technologies to ensure flexibility and portability in cloud deployments, while maintaining the necessary levels of IT security. In FY 2026, we expect to continue utilizing a

hybrid, cloud-based architecture to improve the availability and accessibility of our systems, increase our redundancy, and reduce our dependence on physical datacenters.

## Risk Management and Planning

We have an enterprise risk management (ERM) process to establish, maintain, monitor, evaluate, and report on agency risks. The process is led by the Director of the Office of Internal Control and Risk Management, who reports to the Chief Financial Officer. ERM is an integral part of all strategic planning, performance management, budget, IT, and human capital functions and activities. As part of this effort, we maintain an ERM database, which supports categorizing, documenting, and evaluating risks to the agency.

Management performs ongoing assessments to identify, manage, and update the risks in the ERM database. Our risk profile is developed from the database and ranks risks from an agency-wide perspective. The profile is discussed, prioritized, and reviewed by the Commission's Performance Management and Strategic Planning Committee. The primary purpose of the risk profile is to assess how the risks we face from operations, mission-support activities, and external factors influence our ability to meet the agency's mission and achieve its performance goals.

The Office of Management and Budget (OMB) provides agencies with guidance related to risk management in certain specialized areas, including cybersecurity. OMB directs agencies to assess their cybersecurity risk, to manage the cybersecurity component of enterprise risk, and to adopt the National Institute of Standards and Technology's Framework for Improving Critical Infrastructure Cybersecurity. The Commission manages risk in a way that is commensurate with the magnitude of the harm that would result from unauthorized access, use, disclosure, disruption, modification, or destruction of a federal information system or federal information. The Commission complies with all cybersecurity reporting requirements.

Each quarter, agency leaders and senior staff review progress on our strategic and management objectives and identify and discuss enterprise risks. These reviews, along with the evidence related to specific performance goals and associated risks identified by our managers, inform the development of our Annual Performance Plan and Congressional Budget Justification. We continue to evaluate and implement improvements in our planning and ERM processes to make more effective use of the data we collect.

## Good Accounting Obligation in Government Act

The Good Accounting Obligation in Government Act requires each agency to include in its annual budget justification a report that lists each public recommendation issued by the Government Accountability Office (GAO) and the agency's Office of Inspector General (OIG) that has remained unimplemented for one year or more from the annual budget justification submission date. The Commission does not have any open GAO recommendations. The Commission also does not have any OIG recommendations that have been open for more than one year.

## Publications Proposed for Elimination

The Commission has identified two publications that it has proposed for elimination or streamlining in response to requirements of the GPRA Modernization Act of 2010. Specifically, the Commission has requested elimination of the requirement found in 19 U.S.C. § 3204 to provide the *Andean Trade Preference Act: Impact on U.S. Industries and Consumers and on Drug Crop Eradication and Crop Substitution* report. The requirement is outdated because the President's authority to provide trade preferences under the Act expired in 2013 and has not been extended by Congress. Thus, none of the four eligible countries has participated in the program since 2013. As a result, there is no continued benefit to issuing the report.

Similarly, the Commission requested that Congress streamline the production of the HTS by eliminating the requirement at 19 U.S.C. § 3007(a) to print a hard copy of it. The statute requires the Commission to prepare a hard-copy version of the HTS (the current version totals 4,400 pages) and authorizes it to publish an electronic version. Users of the HTS rely almost exclusively on the electronic version. The requirement of a hard copy duplicates the electronic version. In addition, the hard-copy version often becomes outdated soon after issuance due to the numerous modifications, and it therefore provides little benefit to the public.

## Preparing for Future of Work and Physical Space Reconfiguration

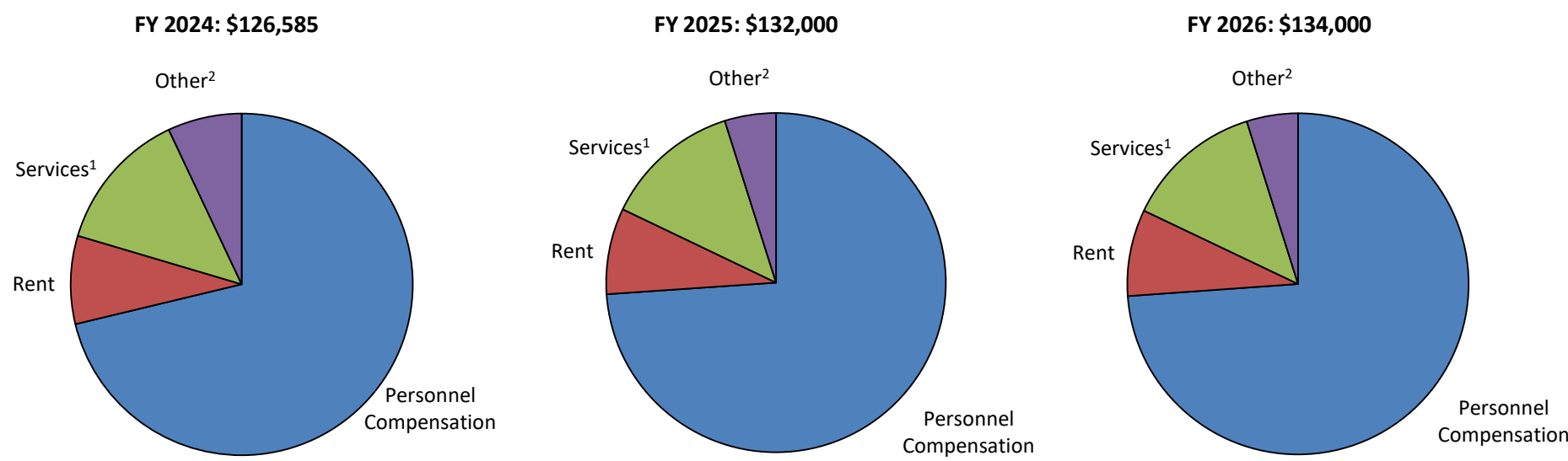
Agency leadership is engaging with mission owners and human capital, IT, and real property mission support functions to determine the most effective and efficient business practices to meet mission requirements in the post-pandemic era. This analysis includes an assessment of our physical space requirements considering changes in work processes and hybrid work. Of particular concern to the agency when assessing future work and physical space configuration is ensuring optimal hybrid operations of our public courtroom complex. At the end of FY 2024, the agency entered a contract to have an updated program of requirements developed for our





existing and future office space needs, considering changes in the way work is performed and updates to federal space standards, since the agency's current lease was entered in 2016. This effort will guide decision-making on potential space reconfiguration and redesign to optimize the environment for the way employees work today and will work in the future. The agency may be able to achieve cost savings over the long term through a reduction in leased space, though a reduction in leased space would come with upfront costs in terms of required reconfiguration of remaining office space and, if done prior to expiration of the lease term (2032), associated penalties.

# Budget Data

## Obligations: Comparison by Budget Object Classification, Fiscal Years 2024–26

(Dollar amounts in thousands)



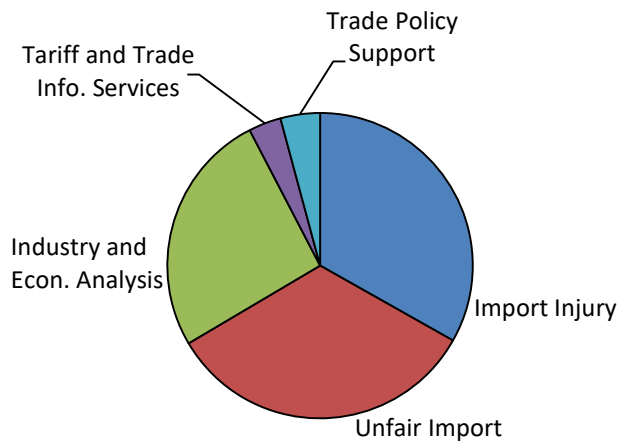
CATEGORY OF OBLIGATION		FY 2024 Actual		FY 2025 Request		FY 2026 Request	
		Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Personnel Compensation		\$90,196	71.2%	\$97,152	73.6%	\$98,967	73.8%
Rent		10,572	8.4%	10,959	8.3%	11,000	8.2%
Services		16,941	13.4%	16,227	12.3%	17,527	13.1%
Other		8,875	7.0%	7,662	5.8%	6,506	4.9%
<b>TOTAL</b>		<b>\$126,585</b>	<b>100.0%</b>	<b>\$132,000</b>	<b>100.0%</b>	<b>\$134,000</b>	<b>100.0%</b>

Note: Dollars may not add due to rounding in this and subsequent charts.  
<sup>1</sup>Services include, but are not limited to, obligations for contractor staff (IT service desk, security guards, financial audits), software licenses, and equipment maintenance.  
<sup>2</sup>“Other” includes budget object classes such as equipment, supplies, communications and equipment rental, travel, training, printing and reproduction, land and structures, postage and contractual mail, and transportation.

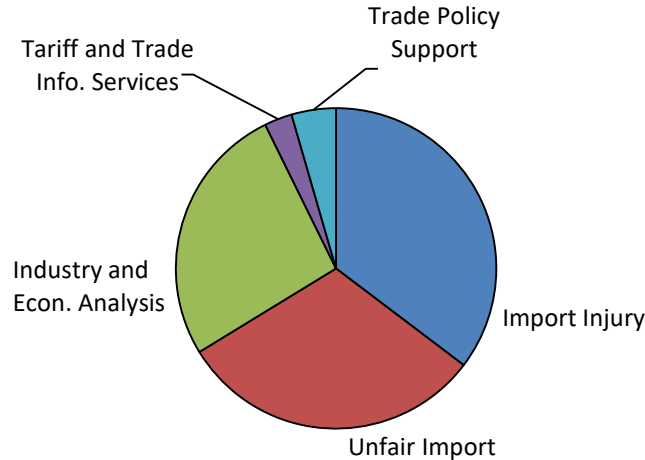
## Obligations: Comparison by Strategic Goal, Fiscal Years 2024–26

(Dollar amounts in thousands)

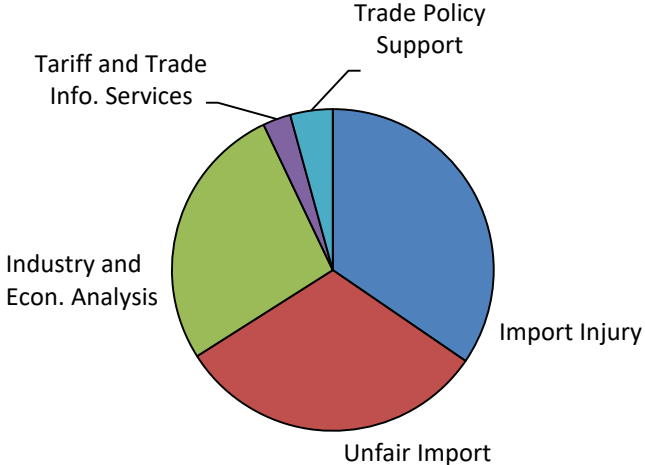
**FY 2024: \$126,585**








**FY 2025: \$132,000**



**FY 2026: \$134,000**



CATEGORY OF OBLIGATION		FY 2024 Actual		FY 2025 Request		FY 2026 Request	
		Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Trade Remedy Investigations (Strategic Goal 1)							
Import Injury		\$41,984	33.2%	\$46,633	35.4%	\$46,306	34.6%
Unfair Import		42,206	33.3%	40,830	30.9%	42,139	31.4%
Tariff, Trade, and Competitiveness-related Analysis and Information (Strategic Goal 2)							
Industry and Economic Analysis		32,772	25.9%	34,905	26.4%	36,055	26.9%
Tariff and Trade Information Services		4,326	3.4%	3,723	2.8%	3,779	2.8%
Trade Policy Support		5,297	4.2%	5,909	4.5%	5,721	4.3%
TOTAL		\$126,585	100.0%	\$132,000	100.0%	\$134,000	100.0%



## Analysis of Change by Budget Object Classification, Fiscal Years 2024–26

(Dollar amounts in thousands)

	FY 2024 Actual	FY 2025 Request	FY 2026 Request	FY 2025–26 Change	Percentage Change
<b>Personnel Obligations</b>	<b>\$90,196</b>	<b>\$97,152</b>	<b>\$98,967</b>	<b>\$1,815</b>	<b>1.9%</b>
<b>Non-personnel Obligations</b>					
Rent	\$10,572	\$10,959	\$11,000	\$40	0.4%
Services	16,941	16,227	17,527	1,300	8.0%
Supplies	2,221	2,152	1,831	-321	-14.9%
Equipment	2,167	1,405	1,210	-195	-13.9%
Travel	447	600	437	-163	-27.2%
Training	824	700	552	-148	-21.2%
Communications and Equipment Rental	1,865	2,324	2,120	-204	-8.8%
Printing and Reproduction	291	338	286	-51	-15.2%
Official Reception and Representation	0	4	2	-2	-57.5%
All Other (Transportation, Postage, Land and Structures, Credit Card Rebates)	1,062	139	69	-70	-50.6%
<b>Subtotal Non-personnel Obligations</b>	<b>\$36,388</b>	<b>\$34,848</b>	<b>\$35,033</b>	<b>\$185</b>	<b>0.5%</b>
<b>Total Obligations</b>	<b>\$126,585</b>	<b>\$132,000</b>	<b>\$134,000</b>	<b>\$2,000</b>	<b>1.5%</b>

# Summary of Changes from the FY 2025 Budget Request

(Dollar amounts in thousands)

## Personnel Obligations

**Personnel.....+\$1,815**

Personnel obligations are expected to increase by about \$1.8 million. This funding is required to sustain the human capital investments that we plan to make in FY 2025. The volume and complexity of our workload demand a challenging level of effort by our current number of staff. In FY 2024, we continued a long-overdue hiring initiative that aims to provide staffing levels commensurate with our workload. Our FY 2025 staffing goal is to have an average staffing level (i.e., full-time equivalents, or FTE) of 437. As of mid-January 2025, our onboard staffing level is 430, with vacancy rates as high as 17 percent in offices responsible for statutory workload.

The Commission continues to experience high and increasing caseload levels in AD/CVD investigations and a higher number of unfair import investigations. AD/CVD filings in FY 2024 reached near-record levels, and we anticipate record levels in FY 2025. As of the fourth quarter of FY 2024, the Commission was handling a record high number of active import injury cases, which has remained at record levels through the first quarter of FY 2025. In FY 2024, we instituted 22 preliminary-phase investigations covering a wide variety of industries in the U.S. economy; more than one-half of the petitions involved imports from multiple countries. We anticipate instituting 26 preliminary-phase investigations in FY 2025 and 17 in FY 2026. In addition to the increase in petitions in FY 2024, the sustained high level of import injury activity over the last decade has contributed to a structural increase in the number of AD/CVD orders returning for five-year reviews. We instituted 37 reviews of existing AD/CVD orders in FY 2024 and anticipate instituting 34 and 45 in FYs 2025 and 2026, respectively.

Further, in FY 2024, our section 337 monthly workload equaled the ten-year monthly average, mainly due to the 30 percent increase in new complaints being filed, after a year of lower filings. Based on the number of complaints filed during the first quarter of FY 2025, 17, we expect the level of new filings to increase in FYs 2025 and 2026. Additionally, in FYs 2025 and 2026, we expect the number of new incoming factfinding reports to increase from FY 2024. Lastly, compared to two or three publications in a typical year, in FY 2024, we published the HTS 10 times to implement multiple tariff changes. We expect that a greater number of publications will be necessary for FYs 2025 and 2026.

This funding level will also cover the anticipated pay raise effective January 1, 2026, and pay for the normal cost of employee promotions, within-grade increases, and increased benefits.

**Non-personnel Obligations**

**Rent.....+\$40**

FY 2026 rent obligations are expected to increase by \$40,000 because of an inflationary increase to operating costs.

**Services.....+\$1,300**

Services obligations are expected to increase by \$1.3 million, largely because of increased funding to improve our web-based applications, including re-engineering of the HTS system to create a more data-centric application. HTS user sessions increased again for FY 2024, with over 10 million sessions initiated, more than twice as many visits seen a decade earlier. It is, therefore, critical that the HTS contain accurate and timely information in an accessible and navigable system. In FY 2024, we evaluated the effectiveness of the current system that supports the HTS and documented deficiencies. We concluded that the current system requires a major upgrade and development effort. In FY 2025, we will document requirements for this upgrade, such that development can commence in FY 2026.

Additionally, funds are required to cover the new operation and maintenance costs associated with our migration to a new federal financial shared services provider. The migration will result in efficiencies and long-term savings by integrating disparate financial management systems, automating processes, and enabling a smaller number of staff to perform financial management responsibilities, allowing upcoming staff retirements to occur without the need to backfill the vacancies.

**Supplies.....-\$321**

Supplies obligations are expected to decrease by \$321,000, reflecting the discontinuance of supplies and data purchases that are no longer critical to support our statutory investigations.

**Equipment.....-\$195**

Equipment obligations are expected to decrease by \$195,000, resulting largely from FY 2025 lifecycle replacement of IT equipment that is not included in the FY 2026 request.

**Travel.....-\$163**

Travel obligations are projected to decrease by \$163,000 and align with post-pandemic travel expectations. This request will sufficiently fund statutory investigations, anticipated studies, knowledge development in emerging trade issues and priority areas, representational travel to international organization meetings, litigation support, and multilateral and regional agreement negotiation support.

**Training.....-\$148**

Training obligations are expected to decrease by \$148,000. The request will provide sufficient funding for developing and advancing staff skills and meeting the licensing, certification, and professional education requirements of existing and newly hired staff.

**Communications and Equipment Rental.....-\$204**

Communications and equipment rental obligations are expected to decrease by \$204,000, driven by planned one-time FY 2025 telecommunications investments that are not included in the FY 2026 request.

**Printing and Reproduction.....-\$51**

Printing and reproduction obligations are expected to decrease by \$51,000 to reflect updated Government Publishing Office requirements.

**All Other (Official Reception and Representation, Transportation, Postage, Land and Structures, Credit Card Rebates).....-\$72**

Land and structures obligations (minor building renovations) are expected to be lower in FY 2026, reflecting the postponement of expenditures until we receive feedback from an architectural and design assessment of our future office space needs.

**Net Non-personnel Obligations Changes.....+\$185**

**Total Adjustment to FY 2025 Base (\$132,000) .....+\$2,000**

**Total FY 2026 Budget Request.....\$134,000**

# Human Resources Data

## The Commissioners

The USITC is headed by six commissioners, who are nominated by the President and confirmed by the U.S. Senate. Amy A. Karpel, a Democrat, is serving as Chair of the Commission, for a term ending June 16, 2026. A Vice Chair has not been nominated for the current term. Other commissioners currently serving are, in order of seniority, David S. Johanson, a Republican, and Jason E. Kearns, a Democrat.<sup>1</sup>

Each commissioner serves a term of nine years, unless appointed to fill an unexpired term. The terms are set by statute and are staggered such that a different term expires every 18 months.<sup>2</sup> A commissioner who has served for more than five years is ineligible for reappointment. A commissioner may, however, continue to serve after the expiration of his or her term until a successor is appointed and qualified. Congress's desire to create an independent and nonpartisan Commission is evident in the rules that dictate the composition of the Commission. No more than three commissioners may be members of the same political party. The Chair and the Vice Chair are designated by the President and serve for a statutory two-year term.<sup>3</sup> The Chair may not be of the same political party as the preceding Chair, nor may the President designate two commissioners of the same political party to serve as the Chair and Vice Chair. Currently two Democrats and one Republican serve as commissioners.

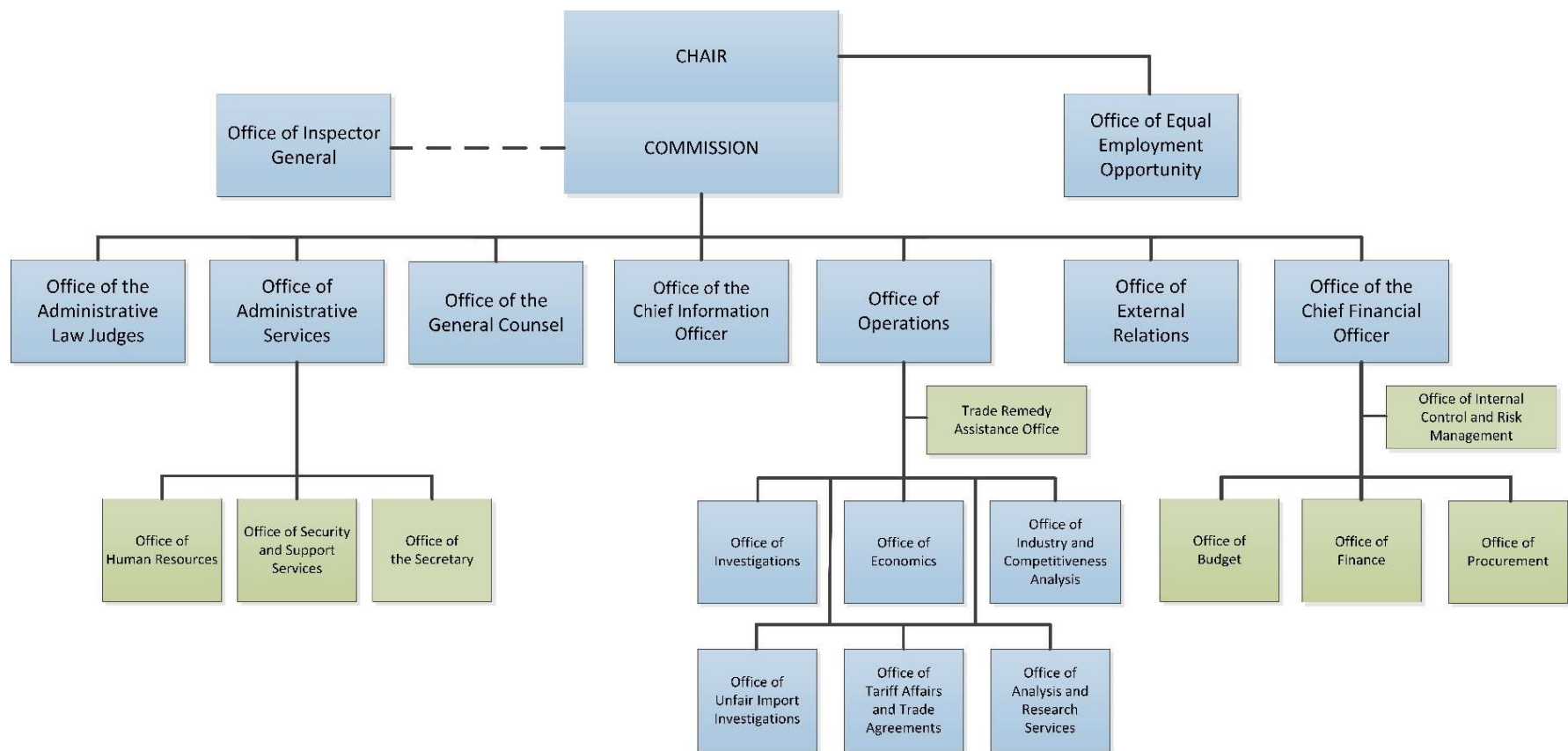
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<sup>1</sup> Currently, there are three vacancies.

<sup>2</sup> 19 U.S.C. § 1330.

<sup>3</sup> If the President does not designate a Chair, the senior commissioner of the relevant political party serves as Chair, by operation of law.

## U.S. International Trade Commission Office-level Organization Chart



## Current Permanent and Term Hiring Plan and Onboard Staffing Levels

Office	Permanent and Term Positions		
	FY 2025 Hiring Plan	Onboard as of 1/17/25	Gap
Commissioners	38	24	14
External Relations	4	4	0
Inspector General	7	4	3
General Counsel	58	58	0
Administrative Law Judges	28	24	4
Equal Employment Opportunity	3	4	-1
Chief Information Officer	41	38	3
<b>Subtotal: Other Offices</b>	<b>179</b>	<b>156</b>	<b>23</b>
Operations	7	7	0
Analysis and Research Services	30	25	5
Investigations	34	33	1
Unfair Import Investigations	28	24	4
Economics	41	41	0
Tariff Affairs and Trade Agreements	14	12	2
Industry and Competitiveness Analysis	71	66	5
<b>Subtotal: Operations</b>	<b>225</b>	<b>208</b>	<b>17</b>
Chief Financial Officer	4	4	0
Budget	3	3	0
Finance	8	6	2
Procurement	5	5	0
Internal Control & Risk Management	2	1	1
<b>Subtotal: Chief Financial Officer</b>	<b>22</b>	<b>19</b>	<b>3</b>
Administrative Services	5	5	0
Human Resources	12	13	-1
Security and Support Services	11	10	1
Secretary and Dockets	21	19	2
<b>Subtotal: Administrative Services</b>	<b>49</b>	<b>47</b>	<b>2</b>
<b>Commission Total</b>	<b>475</b>	<b>430</b>	<b>45</b>

Note: We are constantly evaluating our workload and aligning resources to meet emergent needs. In the short term, we may approve requests for an office to exceed its staffing allocation to meet workload challenges. If those workload challenges persist, we may make the adjustment permanent by shifting positions.





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