Large Residential Washers from Korea and Mexico

Inv. Nos. 701-TA-488 & 731-TA-1199-1200

Petitioner's Public Exhibits
December 11, 2012

2011 ConsumerReports

WFW94HEX*

#1

WFW95HEX*

#2

WFW97HEX*

#3

MHW6000X*

#4

MHW7000X*

#5

FRONT LOAD WASHER RATINGS – WHIRLPOOL

Source: Consumer Reports March 2011

WTW7990XG

#1

MVWB300W*

#4

MVWB750W*

#5

MVWB450W*

#6

MVWB850W*

#7

TOP LOAD WASHER RATINGS – WHIRLPOOL

Source: Consumer Reports March 2011

EXHIBIT 1

WHIRLPOOL WASHER PLATFORMS

"ALPHA"
FRONT LOAD

"OASIS"
TOP LOAD
>3.7 cu. ft.
(In Scope)

"VMW"
TOP LOAD
<3.7 cu. ft.
(Out of Scope)

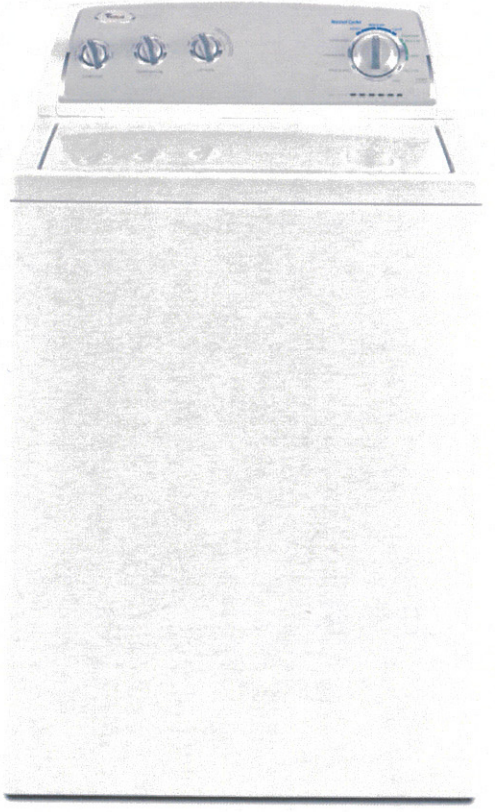
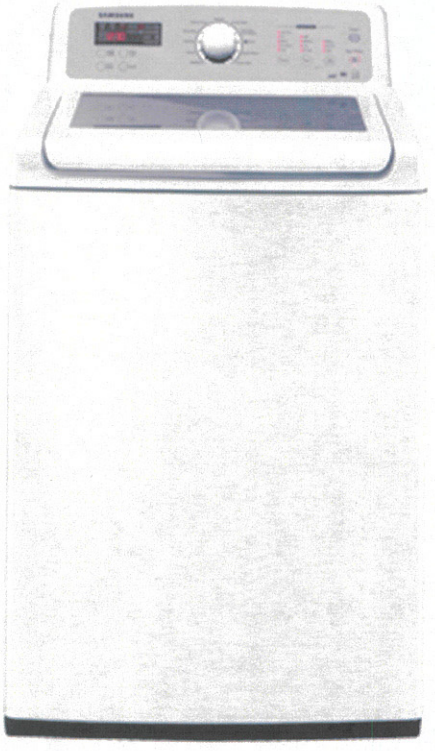


EXHIBIT 2

SAMSUNG

WA5451ANW

- 4.7 cu. ft
- CEE Tier 3
- Heater
- Glass lid



$440 Wholesale
September 2011

Whirlpool® HOME APPLIANCES

WTW8800YW

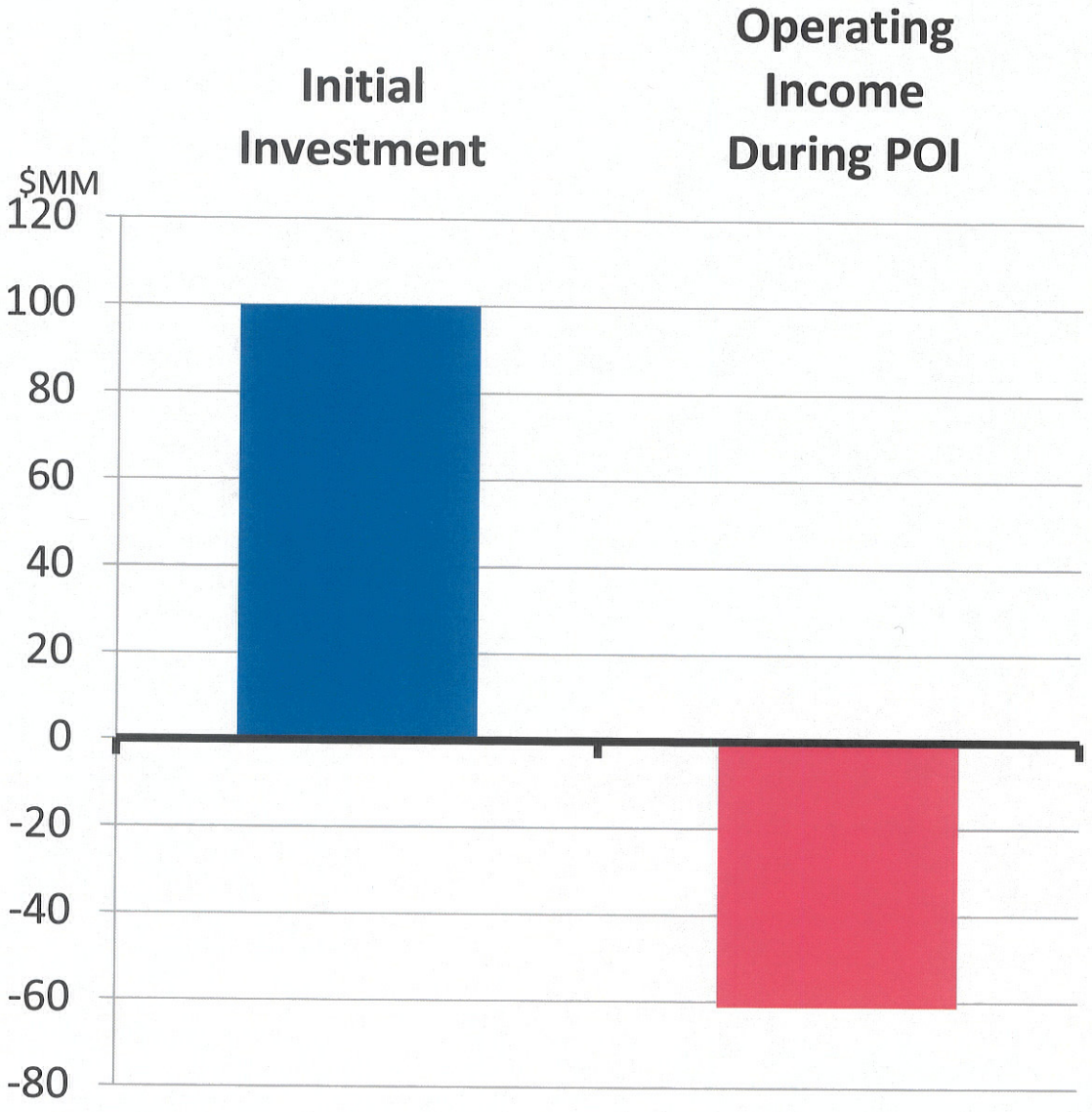
- 4.6 cu. ft.
- CEE Tier 3
- Heater
- Glass lid

$609 Wholesale
September 2011

Source: Whirlpool Corporation market intelligence

EXHIBIT 3

WHIRLPOOL "ALPHA" FRONT LOAD RESULTS

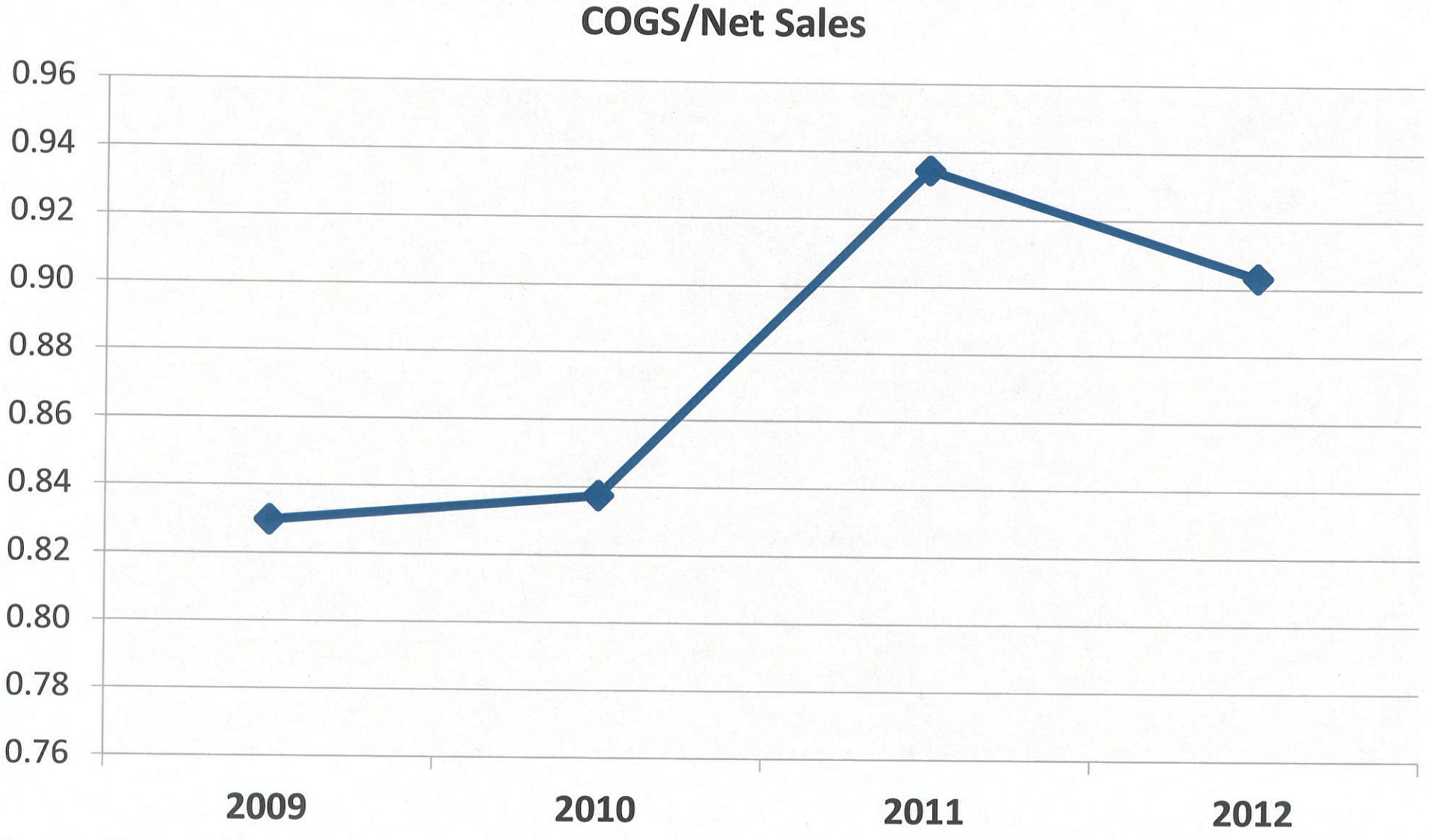


- Subject FL imports: ~1.5 MM units
- Whirlpool U.S. FL capacity: ~500,000 units
- < 50% capacity utilization
- Unprofitable since launch

Source: Whirlpool Corporation

EXHIBIT 4

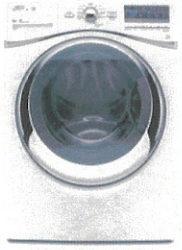
LARGE RESIDENTIAL WASHERS
"COST/PRICE SQUEEZE"



Source: Whirlpool Corporation

EXHIBIT 5

2011 ConsumerReports



WFW94HEX*

#1

WFW95HEX*

#2

WFW97HEX*

#3

MHW6000X*

#4

MHW7000X*

#5

FRONT LOAD WASHER RATINGS – WHIRLPOOL

Source: Consumer Reports March 2011

WTW7990XG

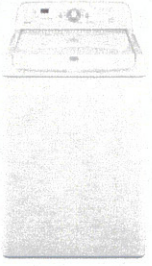
#1

MVWB300W*

#4

MVWB750W*

#5



MVWB450W*

#6

MVWB850W*

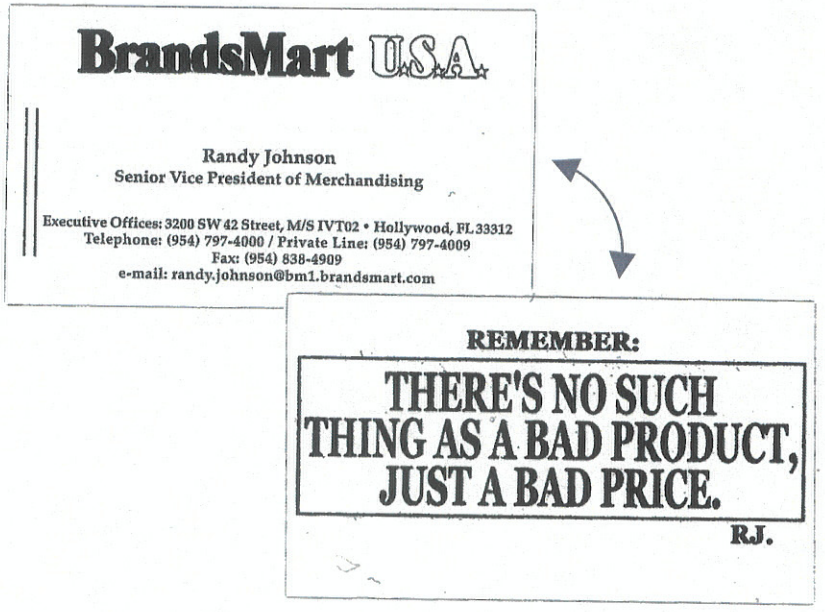
#7

TOP LOAD WASHER RATINGS – WHIRLPOOL

Source: Consumer Reports March 2011

EXHIBIT 6

WHOLESALE PRICE MATTERS



Email from Home Depot

October 19, 2010

"We are looking to floor your new Maxima in white in December to replace the WM02501pair. I would need $800,000 in markdown for this to happen. This would mean the Maxima would be on all floors. Please advise."

Email from Lowe's

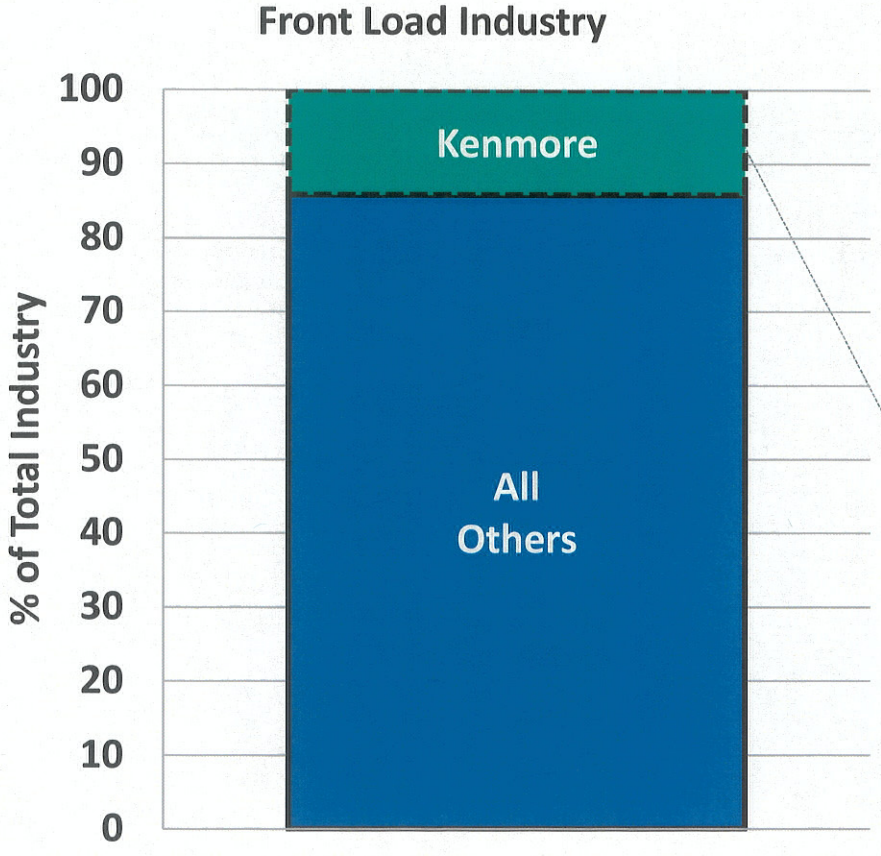
January 18, 2010

"I've only got one open spot that I can do something, so the best fully supported offer wins."

EXHIBIT 7

2011 SEARS SSI BID

(3-YEAR CONTRACT)



Email from Sears SSI Bid Feedback

July 25, 2011

"...costs need to come down 9% of average..."

What was it worth?

~513,000 Units

~14% FL Share

~$263 Million

Traqline: Front Load Branded Market Share Q3 2012

EXHIBIT 8

SUBJECT IMPORTS IMPACTED OUR ABILITY TO RAISE PRICES

Email from Lowe's

June 14, 2012

"I wanted to reiterate in writing that we are NOT accepting Whirlpool Corporations announced July 1st price increase for both stock and SOS product."

Email from Home Depot

April 27, 2012

"As discussed on floor walks this week, ***you will definitely loose spots on the floor with this increase.*** Maxima and most likely the Maytag bravos for sure."

Email from Sears

May 8, 2012

"We do feel that this (price increase) will make Whirlpool generally uncompetitive at most impacted price points. This will impact our ability to advertise these items. I also feel that it could impact productivity that would cause current flooring decisions on ongoing product to be reviewed."

EXHIBIT 9

JUST A SAMPLE OF WHIRLPOOL INNOVATIONS DURING POI

Optimized Dispensing with Bulk Storage (36 loads)*

Upgradable software via USB Port*

Full Color Touch LCD and Laundry Apps*

- Largest FL capacity (Alpha) at launch
- Largest TL capacity (Oasis) at launch
- Oxi (clean) dispenser*
- Self cleaning washer*
- PowerWash system*
- Dynamic venting technology*
- Soft touch impeller*

PowerSpray Technology*

Eco Boost* & Eco Monitor*

Smooth Open Glass Lid*

* Market Firsts

EXHIBIT 10

LG INNOVATION?... THE FACTS

Direct Drive	
Alleged Introduction	**Truth**
2003: LG 2005: Samsung	1981: Whirlpool introduces first direct drive washer (eliminating the drive belt) 1989: F&P invents and introduces current direct drive washer technology (rotor + stator) 1996: F&P first to market direct drive technology in North America 2005: Whirlpool introduces HETL LRW with direct drive technology 2010: Whirlpool repatriates winning HEFL LRWs with direct drive technology
Vibration Reduction Technology	
Alleged Introduction	**Truth**
2009: LG and Samsung	1960s - 1970s: Whirlpool introduces hung suspension to control washer vibration 1981: Whirlpool introduces a water balance ring to improve vibration performance 1997: Whirlpool develops software to detect improper balance in the wash load 1998: Maytag introduces first HEFL in US market with 6 point suspension and tuned counterweight 1999: Whirlpool develops a ball balance ring on first ever HETL washer in the US 2001: Whirlpool launches HEFL LRW "Duet" with 6 point QuietPak Vibration Control System 2005: Whirlpool introduces gap dampers to improve vibration control system "QuietSpin 360" 2010: Whirlpool's Alpha platform launches with a best-in-class adaptive vibration control system (2 ball balance rings)
Allergen Cycle	
Alleged Introduction	**Truth**
2007: LG & Samsung	2001: Whirlpool develops first sanitation cycle w/stepped cleaning on HEFL LRW (sanitization is a higher standard which is inclusive of allergen claims and performance) 2006: Whirlpool co-develops first NSF testing protocol and certification for sanitation for LRW's 2009: Whirlpool co-develops first NSF testing protocol and certification for allergens for LRW's
Machine Diagnostics	
Alleged Introduction	**Truth**
2010: LG & Samsung	1990s: Whirlpool has had error code diagnostics on washers since they've launched electronic controls
Cold Wash	
Alleged Introduction	**Truth**
2010: LG & Samsung	1911: Cold Wash option on washing machines (machines were capable of washing with cold water since the beginning) 2010: Whirlpool works closely with P&G to develop and launch cold wash detergent that can be used in all washers
Advanced Displays	
Alleged Introduction	**Truth**
2006: LG & Samsung	1990s: Whirlpool introduces electronic controls to market 1998: Maytag Neptune launches with an advanced control and LCD diplay 2000s: Whirlpool product evolves LED lights, digital encoders, enhanced aethetics 2010: Whirlpool HETL launches with first TL full color, touch LCD display 2010: Whirlpool HEFL launches with first FL full color LCD display 2010: Whirlpool introduces laundry apps and a USB upgradable display 2012: Whirlpool introduces full capacitive touch display technology

EXHIBIT 11

AESTHETIC DESIGN… WHO'S FOLLOWING WHOM?

Maytag 1997 → Whirlpool 2001 → LG 2003 → Samsung 2006

Whirlpool FL Design Firsts:

- Front control/ configuration
- Round door execution
- Dispenser location/design

Whirlpool TL Design Firsts:

- Top Load Impeller design
- Control layout and design
- Cabinet aesthetics and architecture

Whirlpool 1999 → Kenmore 2005 (by Whirlpool) → Whirlpool 2006 → Maytag 2007 → LG 2010 → Samsung 2011

WHIRLPOOL HAS DEFINED THE MODERN DAY AESTHETICS FOR LRWs

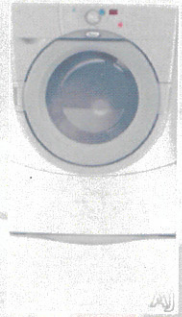
EXHIBIT 12

COLOR LEADERSHIP

2001

Blue Waltz

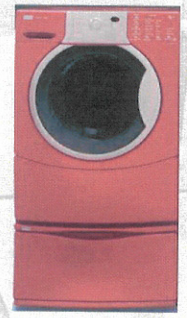
Pewter

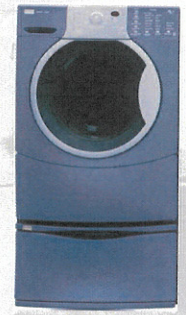

Dove Grey

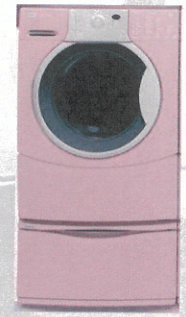
2003

Stainless Steel

2004


Sedona


Pacific Blue


Champagne

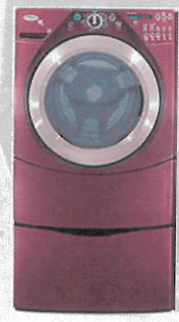
2007

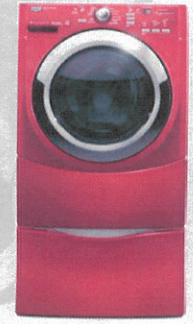
Barolo

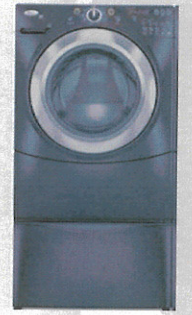
Ocean Sapphire

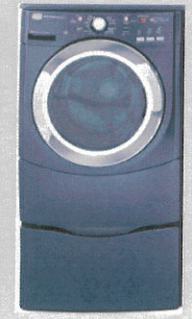
Ultimate Silver

Aspen Green

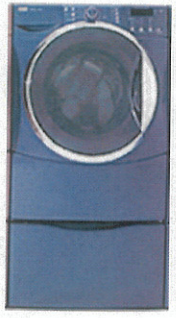

Tuscan Chestnut

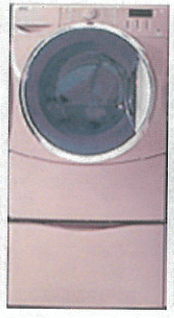

Classic Red


Black


Evergreen

2008


Twilight


Chai

Emerald Green

Oxide

2010

Lunar Silver

Crimson

Granite

Black

Chrome Shadow

2012

Diamond Steel

EXHIBIT 13

WHIRLPOOL® RESIDENTIAL WASHERS Q4 2011

MAP	Front Load Model	Country of Origin	Capacity (Cu. Ft.)	ENERGY STAR®	CEE Tier III	Heater	Steam	Metal Door Rim	LCD Display	Additional Features
$1999										
$1499	WFW97HEXL		4.3	Yes	Yes	Yes	Yes	Yes	Yes	Precision Dispense Ultra Laundry Apps CR† #1
$1299	WFW95HEXL		4.3	Yes	Yes	Yes	Yes	Yes	No	Oxi Dispenser CR† #1
$1199	WFW95HEXW		4.3	Yes	Yes	Yes	Yes	Yes	No	Oxi Dispenser CR† #1
$1099	WFW94HEXW*		4.3	Yes	Yes	Yes	No	Yes	No	QuietSpin 360 CR† #1
$999	WFW9750WW*		3.9	Yes	Yes	Yes	Yes	Yes	No	Dynamic Venting Technology™ Precision Dispense CR† Recommended
$899	WFW9550WW*		3.8	Yes	Yes	Yes	Yes	Yes	No	NightQuiet™ CR† Recommended
$799	WFW9351YW*		3.5	Yes	Yes	Yes	No	Yes	No	Eco-Monitor NSF® Sanitize Cycle
$749										
$699	WFW9151YW		3.5	Yes	Yes	No	No	No	No	EcoBoost™ TumbleFresh™
$649										
$599										
$499										
$449										

Top Load Model	Country of Origin	Capacity (Cu. Ft.)	Agitator/ Impeller	ENERGY STAR®	CEE Tier III	Heater	Lid	LCD Display	Additional Features
WTW7990XG		4.0	Impeller	Yes	Yes	Yes	Clear	Yes	USB Port CR† #1
WTW8800YC		4.6	Impeller	Yes	Yes	Yes	Clear	No	Clean Care Cycle Active Wear Cycle Chrome Accents
WTW8800YW		4.6	Impeller	Yes	Yes	Yes	Clear	No	Sanitary with Oxi Cycle Deep Clean Option LED Basket Light Allergen Cycle
WTW8600YW		4.6	Impeller	Yes	Yes	No	Clear	No	Clean Care Cycle Active Wear Cycle Chrome Accents
WTW8200YW		4.6	Impeller	Yes	Yes	No	Solid	No	Soft Touch Impeller Slow Close Lid
WTW5700XW		3.6	Impeller	Yes	Yes	No	Clear	No	Deep Clean Option Eco-Monitor EcoBoost™ Pre Wash Cycle Delay Wash CR† #2
WTW5600XW		3.6	Impeller	Yes	Yes	No	Solid	No	Quick Wash Cycle 7 Segment Display CR† #2
WTW5500XW		3.6	Impeller	Yes	Yes	No	Solid	No	Dispenser Drawer Cabrio Aesthetics
WTW4950XW		3.6	Impeller	Yes	Yes	No	Solid	No	H2Low™ Wash EcoBoost™ Higher Spin Speed
WTW4850XQ		3.4	Agitator	Yes	No	No	Solid	No	4 Soil Levels 5 Temperatures Soak Only
WTW4800WQ		3.4	Agitator	No	No	No	Solid	No	Cycle Status Quiet Spin Extra Rinse

Top Load Washers <3.7 Cu. Ft. (OUT OF SCOPE)

* Color Up-Charge = $100

CR† = Consumer Reports

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EXHIBIT 14

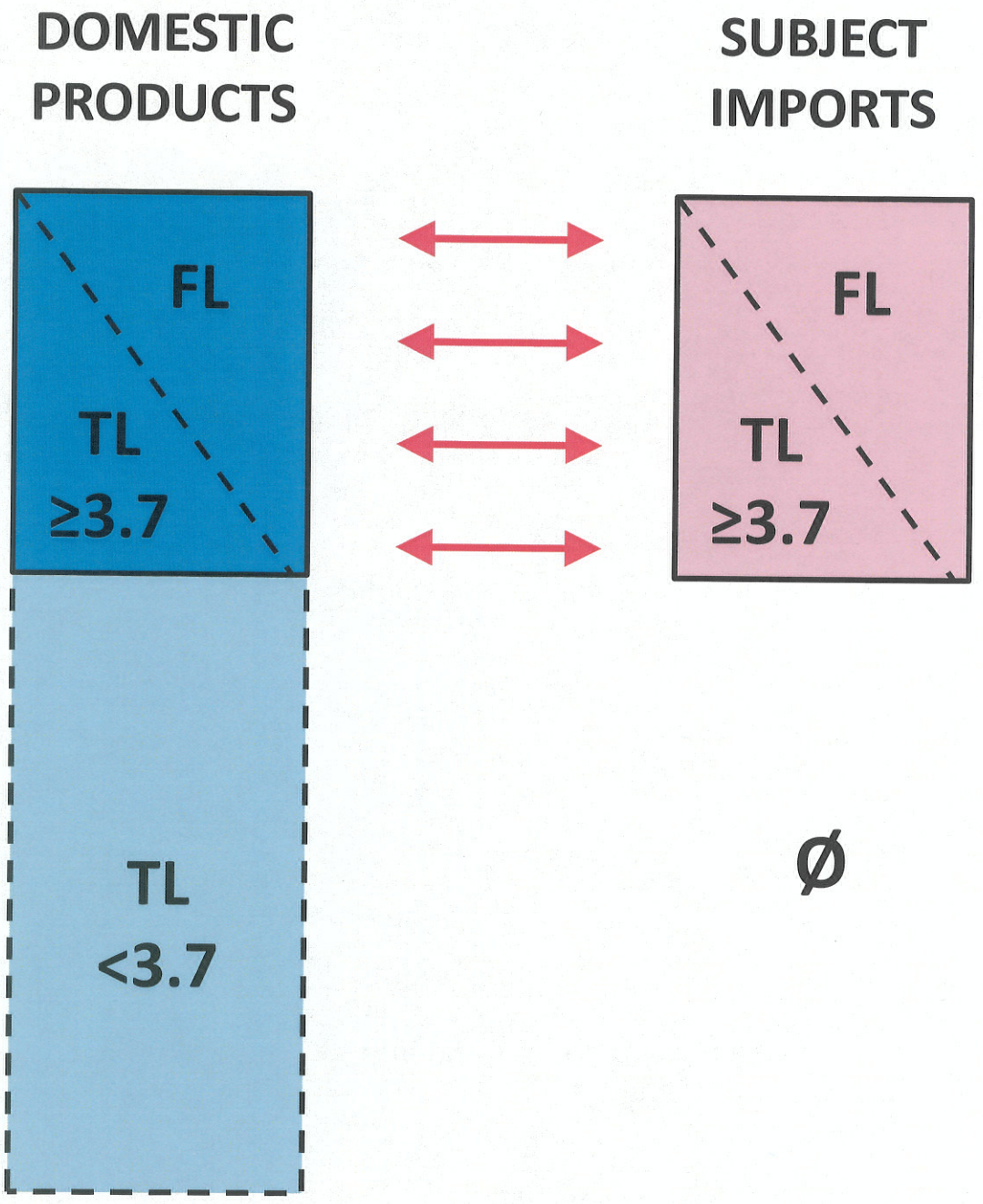
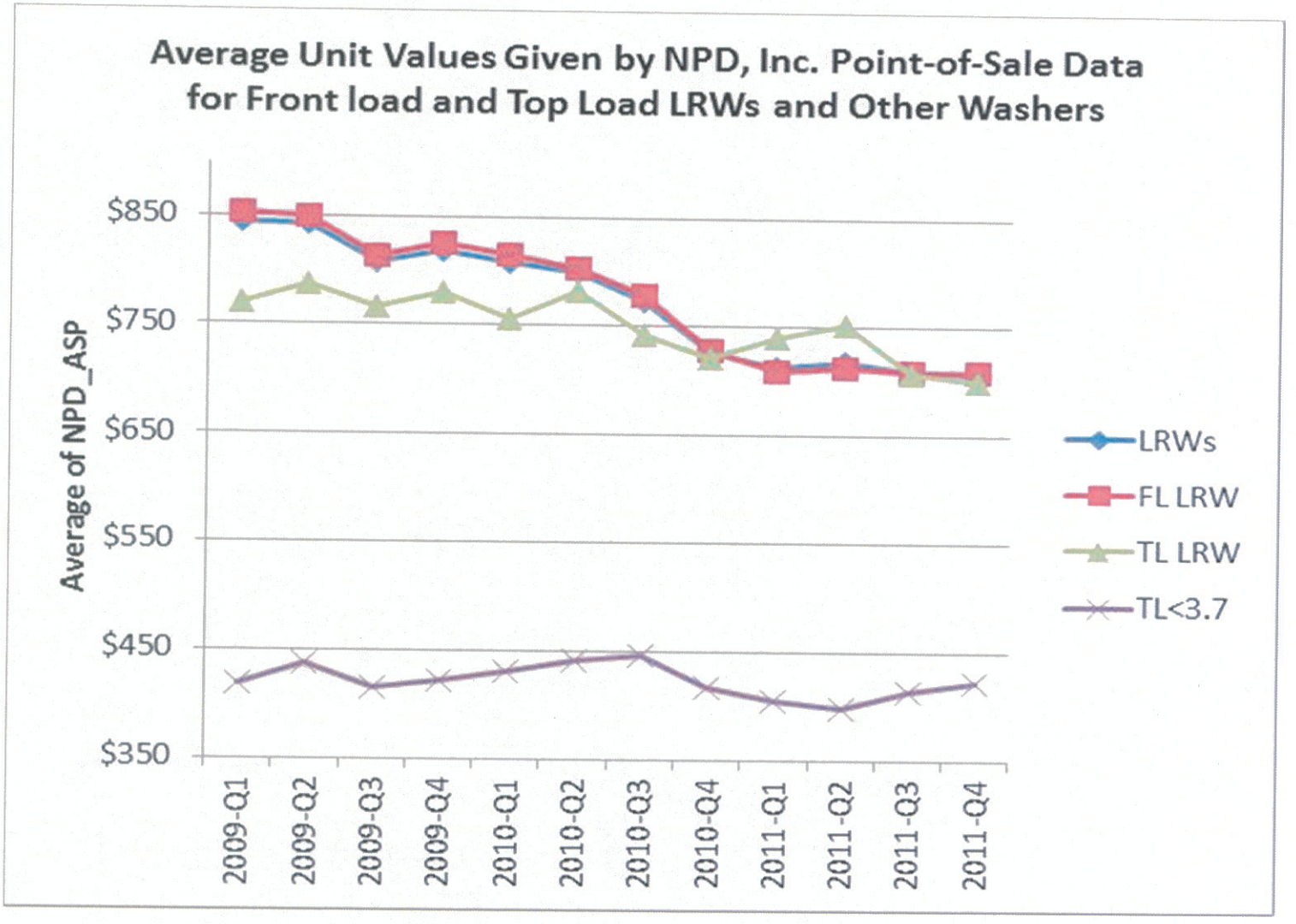


EXHIBIT 15

PRICES OF LARGE RESIDENTIAL WASHERS OVERLAP

TL <3.7 ARE GENERALLY SOLD AT LOWER PRICES



Source: Petitioner's Prehearing Brief at 28

EXHIBIT 16

DOMESTIC LIKE PRODUCT

DEFINED BY REFERENCE TO THE SUBJECT IMPORTS

LIKE PRODUCT	VOLUME
Respondents' Argument	**Respondents' Argument**
"There is no reason why 3.7 cu. ft. capacity would function as a meaningful boundary for this industry…." (LG at 5)	"This {<3.7} is U.S. production that <u>did not compete with subject imports in any way during the POI</u>." (LG at 42)

EXHIBIT 17

Degree of Direct Competition, and Significance of Price per ITC Purchaser Questionnaire Responses

QUESTION		YES	NO
	(1) DEGREE OF DIRECT COMPETITION		
IV-2	Are large residential washers produced in the United States and other countries interchangeable? (Staff Report at II-31)	Most	
IV-5	Since January 1, 2009, have certain grades/types/sizes of LRWs been available from only a single source (domestic or foreign)? (Staff Report at II-22)	1	20
	(2) SIGNIFICANCE OF PRICE		
III-12 (b)	Does your firm vary its purchases based on price? (Staff Report at V-4)	17	2
III-23 (b)	Has your firm ever denied a floor spot because of price? (Staff Report at II-27)	10	8
III-23 (c)	Does your firm factor expected profits into its floor space allocation decisions? (Staff Report at II-27)	14	6
III-23 (d)	Does relative pricing from alternative suppliers affect your floor space allocations among them? (Staff Report at II-27)	12	8
III-27	Does the availability of a highly featured washer at a low price affect the sales of less highly featured washers? (Staff Report at V-12)	19	0
III-31	Is the price you are willing to pay for offerings from one supplier influenced by the prices/features offered by competing suppliers? (Staff Report at V-13)	15	4
IV-3	Are differences other than price a significant factor in your firm's purchases? (Staff Report at II-31)		Most

EXHIBIT 18