IN-PERSON AND ELECTRONIC FILING
Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

PUBLIC DOCUMENT
Re: Wooden Cabinets and Vanities from China, 701-TA-620 and 731-TA-1445 (Prelim):
Testimony

Dear Secretary Barton,

    On behalf of New Century Building Supplies Inc. (DBA. Innocraft Cabinetry), a US importer and a US retailer of subject merchandise, we humbly request to submit this public information as pertinent details to the ongoing investigation. We submit this on behalf of good-intentioned US businesses that both import “Wooden Cabinets and Vanities” from China as well as retail domestic US-manufactured “Wooden Cabinets and Vanities”.

    Specifically, we (New Century Building Supplies Inc.) produce a line of wooden cabinets that are designed in the US, use US-sourced raw wood materials, manufactured in-part in China, then imported in-part to be finished, assembled, and installed in the US. New Century Building Supplies is a 20 year old tax-paying US business, providing the West Coast with both US-made and imported products. As an impacted US business in this sector, we would like to request clarification on 1) how the accusations made by American Kitchen Cabinet Alliance (AKCA) could potentially claim to represent most (or >50%) of US businesses in this industry, and 2) how imposing anti-dumping tariff/duty to this market would solve any claimed industry-wide related trade deficits.

    Manufacturing, whether in the US or China, is only a fraction of the total cost of Wooden Cabinets and Vanities products, thus a tariff imposed on imported goods would benefit marginal profits for very select US manufacturers and cannot address potential industry-wide trade deficit. We cautiously warn the investigation team to consider all aspects of the Cabinet and Vanity products to investigate the potential intent of the petitioners to cause market manipulation and unfair business practices by securing punitive tariffs against select entities. For these reasons, we oppose the motion of anti-dumping measures for imported Wooden Cabinets and Vanities from China.

March 25th, 2019
We would like to humbly propose the following points to consider for this investigation:

1. Wooden Cabinets and Vanities are not commodities as they require significant design, marketing, assembly, and construction, much like an Apple iPhone or Nike shoes. This makes them naturally competitive based on their design and features. Our US-manufactured cabinets and vanities are offered as “Premium” products that can be sold competitively with our imported products due to product differentiation and discerning consumers. Our imported cabinets are manufactured based on patent-pending features and marketed as “Feature” products.

2. There are very distinct retail and wholesale market sectors, each with their individual pricing structures that are offered based on customer needs (custom design, multi-unit projects, and home refurbishing). Both imported and US-made products have remained competitive in their distinct market segment; our customers always know where the products are made and make informed purchase decisions.

3. The diversity and productivity of businesses in this sector is very high; reducing the overall competitiveness of this market as a result of anti-dumping tariffs is not needed to correct an already healthy market. This is why we have offered both imported and US-made products for 20 years.

Thank you for your attention and consideration to our testimony. Please contact me if you have any additional questions,

Respectfully,

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