

THIN SHEET GLASS FROM SWITZERLAND, BELGIUM, AND THE FEDERAL REPUBLIC OF GERMANY

**Determinations of the Commission in
Investigations Nos. 731-TA-127
Through 129 (Preliminary)
(Remand) Under the Tariff
Act of 1930, Together With
the Petition Filed in the
Investigations**



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UNITED STATES INTERNATIONAL TRADE COMMISSION

COMMISSIONERS

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Susan W. Liebeler, Vice Chairman.
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UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

731-TA-127, 128, and 129 (Preliminary) (Remand)

THIN SHEET GLASS FROM SWITZERLAND, BELGIUM,
AND THE FEDERAL REPUBLIC OF GERMANY

Determination

Based upon the petition filed in Investigations Nos. 731-TA-127-129 (Preliminary), ^{1/} the Commission determines ^{2/} that as of May, 1983, the date of the Commission's initial determination regarding thin sheet glass from Belgium, Switzerland and the Federal Republic of Germany, there is a reasonable indication that an industry in the United States producing regular quality thin sheet glass is materially injured or threatened with material injury by reason of imports allegedly sold at less than fair value (LTFV). The determination in this matter is made pursuant to the order of the U.S. Court of International Trade entered March 22, 1985, in Jeannette Sheet Glass Corp. v. United States. ^{3/}

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- ^{1/} Pursuant to the order of the U.S. Court of International Trade (CIT) in Jeannette Sheet Glass Corp. v. United States, 607 F. Supp. 123 (1985), the Commission has made its redetermination consistent with the standards set forth in Republic Steel Corp. v. United States, 591 F. Supp. 640 (1984), motion for reconsideration denied, ___ F. Supp. ___, slip op. 85-27 (March 11, 1985). Thus, we have based our determinations solely on the allegations contained in the petition.
 - ^{2/} Vice Chairman Liebeler, Commissioner Lodwick, and Commission Rohr did not participate in the Commission's prior investigation.
 - ^{3/} Chairwoman Stern affirms her earlier decision that there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of thin sheet glass from Belgium, Switzerland and the Federal Republic of Germany allegedly sold at less than fair value. Chairwoman Stern notes, however, that she based her prior determinations on the record as a whole that was developed during that investigation.

Background

On March 16, 1983, counsel for Jeannette Sheet Glass Corp. filed a petition with the Commission and the Department of Commerce alleging that imports of thin sheet glass from Switzerland, Belgium, and the Federal Republic of Germany are being sold in the United States at LTFV, and that an industry in the United States is materially injured, or is threatened with material injury, or the establishment of an industry in the United States is materially retarded, by reason of imports of such merchandise. Accordingly, effective March 16, 1983, the Commission instituted preliminary investigations under section 733(a) of the Act (19 U.S.C. § 1673b(a)).

On May 2, 1983, the Commission ^{4/} determined that there was no reasonable indication that an industry in the United States was materially injured or threatened with material injury by reason of imports of regular quality thin sheet glass from Belgium, Switzerland, and the Federal Republic of Germany. ^{5/} On May 17, 1983, Jeannette Sheet Glass Corp. appealed the Commission's determinations to the U.S. Court of International Trade (CIT).

On March 22, 1985, the CIT remanded the case to the Commission and ordered the Commission to (1) reconsider its preliminary negative determinations respecting material injury and threat of material injury in conformity with the standard for preliminary determinations set forth in Republic Steel and in conformity with the court's decision in this case,

^{4/} Commissioners Eckes and Haggart.

^{5/} Commissioner Stern dissenting.

and (2) report its findings and redeterminations to the court within thirty days after the date of entry of the order.

In conformity with the court's order, the Commission has applied the Republic Steel standard and considered whether the petition raises the possibility of material injury or threat of material injury.

Issued:

VIEWS OF THE COMMISSION

The Commission submits these views in response to the March 22, 1985, order of the U.S. Court of International Trade (CIT), 1/ remanding to the Commission investigations Nos. 731-TA-127-129 (Preliminary), Thin Sheet Glass from Switzerland, Belgium, and the Federal Republic of Germany. On May 2, 1983, having conducted the preliminary investigations prescribed by statute, the Commission 2/ determined that there was no reasonable indication that an industry in the United States was materially injured or threatened with material injury by reason of imports of regular quality thin sheet glass from Switzerland, Belgium, and the Federal Republic of Germany allegedly sold at less than fair value (LTFV). 3/ The Commission found that there was no reasonable indication that imports of regular quality thin sheet glass had caused the difficulties experienced by the domestic industry.

On March 22, 1985, the CIT found that the Commission misapplied the reasonable indication standard as interpreted by the court in Republic Steel Corp. v. United States, 607 F. Supp. 123. The CIT remanded these investigations to the Commission to reconsider under the Republic Steel standard whether there is a reasonable indication of material injury or threat of material injury to the domestic industry producing regular quality thin sheet glass. 4/

Pursuant to the court's order, we have considered whether "the petition contains the evidence of injury which could reasonably be expected to be

1/ 607 F. Supp. 123.

2/ Commissioners Eckes and Haggart.

3/ Commissioner Stern dissenting.

4/ The court's order does not require the Commission to reconsider those portions of the Commission's determination that relate to the definition of the domestic industry or to the condition of the domestic industry. Therefore, in this opinion we adopt those previous findings.

within petitioner's knowledge, or is false, or is in conflict on essential points with matters of public record, or does not state injury as a matter of law even if its contents are taken as true. . . ." 5/ Also in accordance with the Republic Steel standard and pursuant to the court's order, the Commission did not weigh conflicting evidence in reaching its determination. 6/

Reasonable indication of material injury by reason of imports of regular quality thin sheet glass.

The petition contains the evidence of injury which could reasonably be expected to be within petitioner's knowledge. 7/ That evidence does not appear to be false, nor is it in conflict on essential points with matters of public record. Taken as true, the contents of the petition do not fail to state injury as a matter of law. Further, the petition alleges and contains evidence indicating: a significant and increasing volume of imports; 8/ underselling; 9/ price depression and price suppression; 10/ and other adverse effects caused by imports. 11/

Therefore, applying the Republic Steel standard for reasonable indication of material injury or threat of material injury as ordered by the court, we determine that there is a reasonable indication of material injury or threat of material injury by reason of imports of regular quality thin sheet glass

5/ Republic Steel Corp v. United States, —F. Supp.—, slip op 85-27 at 3 (March 11, 1985).

6/ Id. at 2.

7/ The Commission has looked solely at the petition as instructed in the court's opinion in Republic Steel denying the Commission's motion for reconsideration. Id.

8/ Petition at 28-33.

9/ Id. at 34-37.

10/ Id. at 38-39.

11/ Id. at 40-46.

from Switzerland, Belgium, and the Federal Republic of Germany that are allegedly sold at LTFV. 12/

We note that the Commission is acting solely under the compulsion of the court's order and that the Commission continues to believe that the Republic Steel standard for determining whether there is a reasonable indication of material injury or threat of material injury is unsupported by the statute, the legislative history, and Congress' clear intent.

12/ Chairwoman Stern notes that in the original investigations, she found a reasonable indication of material injury or threat of material injury based upon her analysis of the entire record and not just the petition. In making her analysis, she utilized the same "reasonable indication" standard as the Commission majority and not the standard articulated by the court in Republic Steel, which she believes is overly-restrictive. Thus, she interprets the court's order as applying to her as well, and joins in this unanimous opinion.

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Public Version of Document Which Contains "Business Confidential" Information, Submitted in Reliance Upon 19 CFR 201.6, 207.4(a), 353.28-29; 19 U.S.C. 1677f(b)(1); 5 U.S.C. 552(b)(4); and 18 U.S.C. 1905, on pages 29-33, 36, 37, 39, and 40-45, and in Exhibit 1.

March 16, 1983

Honorable Malcolm Baldrige
Secretary of Commerce
U. S. Department of Commerce
Washington, D.C. 20230

Mr. Kenneth R. Mason
Secretary
United States International
Trade Commission
701 E Street, N.W.
Washington, D.C. 20436

Attention: Mr. Lawrence J. Brady
Assistant Secretary
for Trade Administration
Room 3826, Department of Commerce

Dear Mr. Secretary:

Re: Petition Requesting the Imposition of Antidumping Duties on Imports of Thin Sheet Glass from Switzerland, Belgium, and the Federal Republic of Germany.

Pursuant to Subtitles B and D of Title VII of the Tariff Act of 1930 (the Act) (19 U.S.C. §§ 1673 - 1673i and 1677 - 1677g), this petition is being filed on behalf of the United States domestic industry producing thin sheet glass. Imports of thin sheet glass manufactured in Belgium, Switzerland, and the Federal Republic of Germany are being, or are likely to be, within the meaning of the Act, sold in the United States at less than fair value. As a consequence, the United States domestic industry producing the subject thin sheet glass is being materially injured and is threatened with material injury by reason of the less-than-fair-value ("LTFV") imports. The petitioner, Jeannette Sheet Glass Corporation ("Jeannette"), seeks the imposition of an antidumping duty upon this

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merchandise, in addition to any other duty imposed, which will be equal to the amount by which the foreign market value exceeds the United States price for the merchandise. In consonance with 19 C.F.R. 353.36(a), information reasonably available to the petitioner is submitted below in support of these allegations.

(1) The name and address of the petitioner:

Jeannette Sheet Glass Corporation
P.O. Box 739
Jeannette, Pennsylvania 15644

(2) The industry on whose behalf the petition is filed, including the names of other enterprises included in such industry:

This petition is filed on behalf of the sole domestic producer of thin sheet glass, Jeannette Sheet Glass Corporation. Unlike most other categories of sheet glass, the particular sheet glass which is the subject of this antidumping duty petition cannot be manufactured by the float glass process. The very thin glass required, for example, for microscope slides and microcovers, weighing over 4 ounces, but not over 12 ounces per square foot, is manufactured by Jeannette Sheet Glass Corporation in its sheet glass plant at Jeannette, Pennsylvania. In addition to the very thin dimension of the glass, the particular sheet glass used in the manufacture of microscope slides and microcovers must also be super clear and free from distortion. Jeannette's thin sheet glass possesses these qualities thanks to the particular nature of its manufacturing process at Jeannette, and to its particular technology for the elimination of distortion and the enhancement of clarity in thin sheet glass.

The petitioner knows of no other sheet glass producer in the United States. West Virginia Flat Glass, Inc., in Clarksburg, West Virginia which is owned by Asahi Glass Co., Ltd., offered sheet glass ranging in thickness from 2.0mm to 3.0mm. See, Confidential Exhibit 1. West Virginia Flat Glass has, however, discontinued operations; part of its equipment has been sold, the rest has been offered for sale, and the plant continues to be idle.

Jeannette, therefore, believes that it is the only domestic manufacturer of sheet glass with the productive capacity, technology, and definite market interest in supplying the specialized thin sheet glass required in the domestic manufacture of such products as, for example, microscope slides and microcovers, lantern slides, photocopier slides, and cosmetic mirrors.

The International Trade Commission ("ITC") has in the past determined that the domestic "flat glass" industry consists of both sheet glass and float glass producers. In Clear Sheet Glass from Romania, Inv. No. AA1921-163, USITC Pub. No. 811 (April 1977), the Commission determined that the float glass and sheet glass products under investigation were interchangeable. Id. at 4. The "Information Obtained in the Investigation" stated that float glass is chiefly used to make "laminated windshields and tempered side and rear windows of motor vehicles, to glaze large openings such as store display windows and so-called curtain walls, and to make high quality mirrors." Id. at A-5. Moreover, in identifying the areas of "direct competition" between float and sheet glass, the ITC staff identified the markets for automobile

glass, mirrors, tabletops, desk covers, sash (window panes), and doors. Id.; see also Summary of Trade and Tariff Information, Flat Glass and Certain Glass Products, USITC Pub. No. 841, 21 (October 1982). The Commission's opinion and findings of fact in Clear Sheet Glass from Romania, thus, did not address the composition of the domestic industry producing thin sheet glass as defined by this petition.

The merchandise which is the subject of this petition, namely thin sheet glass from 0.6mm to 1.65mm (.026 inch to .065 inch) in thickness, is not subject to competition from producers of float glass simply because float glass cannot be produced at a cost competitive with sheet glass in very thin thicknesses. Generally, float glass is only produced in thicknesses from 2.5 to 25 millimeters. E.g., H. Newman, An Illustrated Dictionary of Glass, 119 (1977). More importantly, sheet glass produced by the "Vertidraw" process in the 0.050 to 0.125 inch range is superior to float glass. See, The Handbook of Glass Manufacture, vol. 2, 688 (1974).

There is, then, no "like product" manufactured by the float glass method which competes with thin sheet glass. Accordingly, for the purpose of this investigation, Jeannette Sheet Glass Corporation is the sole domestic producer in the United States, within the meaning of section 771(4) of the Act.

(3) The applicant has neither filed nor is filing for import relief pursuant to section 201 or to section 301 of the Trade Act of 1974 (19 U.S.C. § 2251) and has not initiated proceedings pursuant to section 337 of the Act (19 U.S.C. § 1337) or pursuant to section 232 of the Trade Expansion Act of 1962 (19 U.S.C. section 1862).

(4) A detailed description of the imported merchandise in question, including its technical characteristics and uses, and, where appropriate, its tariff classification under the Tariff Schedules of the United States:

"Sheet" glass is a relatively thin glass, fire-finished with a glossy surface, which exhibits high transparency. Sheet glass is a flat sheet drawn from molten glass varying in width from 60 to 120 inches and in thickness from 0.05 inch to 7/16th inch. See The Handbook of Glass Manufacture, vol. 2, 689 (1974). For purposes of this petition, "thin sheet glass" includes "photo", "lantern slide", "standard micro", and "ultra thin", determined by thickness as follows:

	Inches			Millimeters (mm)		
	Min.	Avg.	Max.	Min.	Avg.	Max.
Photo	.057	.061	.065	1.45	1.55	1.65
Lantern slide	.045	.048	.051	1.14	1.22	1.30
Standard micro	.036	.039	.042	.91	1.00	1.07
Ultra thin	.026	.028	.030	.667	.712	.769

Each type of thin glass may also be expressed in terms of its average weight, thus: photo averages 12.68 oz./sq. ft.; lantern slide averages 9.97 oz./sq. ft.; standard micro averages 8.11 oz./sq. ft.; and, ultra thin averages 5.82 oz./sq. ft.

Thin sheet glass in the thicknesses and weights set forth above is used in many applications, including watch crystals, photographic negatives and slides for projection in a slide projector (lantern slides), microscope slides, and cosmetic mirrors. Thin sheet glass is also employed in the manufacture of LED and LCD crystals, coated optical glass for instrumentation, and other technical applications.

The Tariff Schedules of the United States, Annotated, classify thin glass in items 542.1100 and 542.1300. Item 542.1100, TSUSA, is

described as "Glass (whether or not containing wire netting), in rectangles, not ground, not polished and not otherwise processed, weighing over 4 oz. per sq. ft.: Other, including blown or drawn glass, but excluding pressed or molded glass: Ordinary glass: Weighing over 4 oz. but not over 12 oz. per sq. ft.: Measuring not over 40 united inches." Item 542.1300, TSUSA, is defined by identical language excepting the last clause which states: "Measuring over 40 united inches."*

The Tariff schedules thus include all types of thin sheet glass, regardless of intended application or quality. The TSUSA coverage is significant because a significant portion of the production of Flachglas in West Germany and Glaverbel in Belgium is a distinct product line, sometimes sold under the trade name "Vitover," which is usually sold in sizes not over 40 united inches and which is a more expensive thin sheet glass produced specifically for the photographic slide industry, the optical coating market for instrumentation, and other technical and scientific applications, including LED and LCD applications. Jeannette, on the other hand, produces thin glass primarily to be used for microscope slides and cosmetic mirrors. In the market in which Jeannette competes with Glaverbel, Erie-Electroverre, and Flachglass, the thin sheet glass is considerably less expensive to produce and sell than in the market for "Vitover" thin sheet glass.

* "United inches" are equal to the sum of the length and width in inches of a rectangular piece of glass.

(5) The name of the country or countries from which the merchandise is being, or is likely to be, exported to the United States:

Belgium, Switzerland, and the Federal Republic of Germany.

(6) The names and addresses of all known foreign enterprises believed to be manufacturing, producing, or exporting the merchandise in question:

Glaverbel, S.A.
166 Chaussee de la Hulpe
Brussels, Belgium

Erie-Electroverre S.A.
Romont, Switzerland

Flachglas, A.G.
West Germany

Asahi Glass Co., Ltd., a major Japanese glass producer, holds approximately 80 percent of Glaverbel, S.A., and the French group BSN holds the remainder.

Erie-Electroverre, formerly Elektroverre Romont, S.A., in Romont, Switzerland is wholly owned by the Sybron Corporation, Portsmouth, New Hampshire, which acquired and renamed Elektroverre Romont, S.A., on January 1, 1983.

Market research indicates that there is one other West German producer of thin glass, Deutsche Spezialglas, A.G. (DESAG). DESAG, however, reportedly produces only an optical quality thin glass which is not similar to the merchandise covered by this petition.

(7) All pertinent facts as to the price at which the foreign merchandise is sold or offered for sale in the United States and in the home market in which produced or from which exported, including information concerning transportation and insurance charges and information regarding sales in third countries and cost of producing the merchandise:

Petitioner believes that the thin glass products identified in section (4) above and imported from Belgium, Switzerland, and the Federal Republic of Germany are being, or are likely to be, sold in the United States at less than fair value within the meaning of section 731 of the Act. Market research performed on behalf of Jeannette and submitted separately in support of this petition discloses that the home market prices for each of the products identified were above the f.o.b. origin prices for export to the United States in 1980, 1981, and in all or many of the four quarters of 1982. Tables 1A, 1B, and 1C, infra, present a comparison of the home market prices in Belgium, Switzerland and West Germany with (1) the average unit value, f.o.b. origin, of imports to the United States as given by Commerce Department, Bureau of the Census, statistics, (2) the average unit value, f.o.b. origin, of exports to the United States as given by Belgian, Swiss, and West German export statistics and the market research, (3) the prices of exports to the European Community (EC) and the cost of production as given by the market research, and (4) the export prices to third countries, where available. The tables show the continuous presence of substantial margins of less-than-fair-value sales by imports from each of the three countries during the period 1980 through 1982.

It is important to note well the shortcomings of the Commerce Department, Bureau of the Census, statistics which were compared with home market prices in Tables 1A, 1B, and 1C, and which were used as the basis for calculating landed cost as set forth infra in Tables 3 and 5. The TSUSA items which include the thin sheet glass products covered by this petition (see supra section (4)) include in their coverage some thin glass which is not covered by this petition. For example, items 542.1100 and .1300, TSUSA, include thin glass which contains wire netting imbedded in the glass. Also, both statistical classifications include glass which weighs as little as 4 ounces per square foot. As defined in section (4) of this petition, ultra thin glass at a minimum will be 5.41 ounces per square foot. The pricing data set forth in Tables 1A, 1B, and 1C, and elsewhere in this petition, indicate that as the thickness of the glass decreases, the price of the glass increases. Accordingly, the Commerce Department statistics, to the extent that they include glass which is not covered by this petition yet which is more expensive than the subject thin glass, overstate the average unit value, f.o.b. origin, of thin glass.

(a) Belgium

Table 1A which follows shows in section I(a) the average unit value, f.o.b. origin, of Belgian imports of thin sheet glass for glass classified in items 542.1100 and 542.1300, TSUSA, separately, and the weighted average unit value for all entries under items 542.1100 and .1300 taken together. Subsection (b) sets forth the Belgian export prices to the United States for two separate thickness ranges, viz. 0.6mm

through 1.0mm and 1.0mm through 1.5mm. Subsections (c), (d), and (e) set forth the home market prices, EC prices, and Belgian cost of production for thin glass of specified thicknesses.

Given that the coverage of the TSUSA items includes some thin sheet glass imports not of concern to this petition, a more accurate comparison to home market price can be made by resort to Belgian export statistics which reveal prices for export to the U.S. of thin sheet glass broken down into two thickness categories. This comparison, as shown by section II(d) of Table 1A, reveals substantial margins of underselling in 1980, 1981, and 1982. In the most recent two quarters of 1982, Belgian home market prices were 34.6 percent and 38.1 percent above export prices to the U.S. of comparable thin glass. Moreover, comparing the export prices in part I subsection (b) with the home market prices in subsection (c) or with the EC prices in subsection (d), reveals LTFV sales in each thickness category separately broken out:

Part II(a) of Table 1A similarly reveals substantial LTFV margins when Commerce Department statistics are compared with home market price. As shown in subsection (a) of section II, the f.o.b. origin price of imports from Belgium in 1980 was 85.6 percent below home market price, while in 1981 the LTFV margin was 13.0 percent. In 1982, subsection (a) indicates substantial margins of LTFV sales in all but the fourth quarter, and the absence of LTFV margins in the fourth quarter was apparently due to the coverage of item 542.1100, TSUSA, rather than to fair trading on the part of the Belgian producers. Thus, examination of the figures in part I, subsection (a), reveals that imports not over 40

united inches in the fourth quarter 1982 had an extraordinarily high average unit value which skewed the weighted average for all thin glass upward. When home market prices are compared, instead, to entries in commercial-size sheets, i.e., over 40 united inches, part II section (c) of Table 1A reveals that the margins of underselling in the fourth quarter 1982 exceeded the LTFV margins in 1980, 1981, and the prior three quarters of 1982, and amounted to 162.2 percent of the average unit value of Belgian imports in the fourth quarter.

Table 1A

Comparison of Belgian, FOB Origin, Import
Prices with Belgian Home Market Prices, Third
Country Prices, and Belgian Cost of Production
for Thin Sheet Glass
(1980 - 4th Qtr 1982)

	1980 (BF/m ²)	1981 (BF/m ²)	1982			
			1st Qtr (BF/m ²)	2nd Qtr (BF/m ²)	3rd Qtr (BF/m ²)	4th Qtr (BF/m ²)
<u>Part I: Sales prices and cost of production:</u>						
<u>a) Belgian prices for Export to U.S. and other countries compared with home market prices, E.C. prices, and costs of production (for thin sheet glass 0.7mm - 1.5mm (+/- 0.1mm) in thickness):</u>						
Avg. Unit Value, f.o.b. origin, U.S. imports:	78.01	142.09	93.32	136.58	135.67	230.49
(not over 40 united inches)	153.46	405.97	121.07	524.47	251.14	827.42
(over 40 united inches)	63.07	63.15	75.67	65.56	63.51	65.01
Avg. Unit Value, Belgian Exports to U.S.	67.24	86.93	106.08	112.88	121.68	123.43
Belgian home market price	144.80	160.60	151.08	157.28	163.74	170.44
Export price to E.C.	126.75	98.05	110.15	115.25	120.80	127.25
Cost of Production in Belgium	124.14	133.85	na	na	125.02	125.02

<u>b) Belgian Export price to U.S.:</u>						
--0.6mm - 1.0mm thickness:	74.01	97.74	121.70	127.75	139.60	141.50
--1.0mm - 1.5mm thickness:	56.96	69.23	90.45	98.00	103.75	105.35
--0.6mm - 1.5mm thickness:	67.24	86.93	106.08	112.88	121.68	123.43

<u>c) Belgian home market prices:</u>						
--0.6mm - 0.8mm thickness:	247	270	211.7	220.4	229.4	238.8
--0.8mm - 1.0mm thickness:	163	180	169.3	176.2	183.5	191.0
--1.0mm - 1.2mm thickness:	118	132	141.1	147.0	152.9	159.2
--1.2mm - 1.4mm thickness:	102	115	129.8	135.1	140.7	146.4
--1.4mm - 1.6mm thickness:	94	106	103.5	107.7	112.2	116.8
--0.6mm - 1.6mm thickness:	144.80	160.60	151.08	157.28	163.74	170.44

<u>d) Belgian Export price to E.C.:</u>						
--0.6mm - 1.0mm thickness:	158.35	123.96	124.90	129.70	135.10	141.20
--1.0mm - 1.5mm thickness:	107.67	89.41	95.40	100.80	106.50	113.30
--0.6mm - 1.5mm thickness:	126.75	98.05	110.15	115.25	120.80	127.25

<u>e) Belgian Cost of Production:</u>						
--0.6mm - 1.0mm thickness:	na	182.56	na	na	170.52	170.52
--1.0mm - 1.6mm thickness:	na	85.21	na	na	79.59	79.59
--0.6mm - 1.6mm thickness:	124.14	133.85	na	na	125.02	125.02

Table 1A (cont.)

Comparison of Belgian, FOB Origin, Import
Prices with Belgian Home Market Prices, Third
Country Prices, and Belgian Cost of Production
for Thin Sheet Glass
(1980 - 4th Qtr 1982)

	1982					
	1980 (BF/m ²)	1981 (BF/m ²)	1st Qtr (BF/m ²)	2nd Qtr (BF/m ²)	3rd Qtr (BF/m ²)	4th Qtr (BF/m ²)
Part II: Margins of Sales at Less than Fair Value:						
<u>a) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) included in items 542.1100 and .1300, TSUSA, and is compared to the following:</u>						
--Belgian home market price	85.6%	13.0%	61.9%	15.2%	20.7%	-26.0%
--Export price to E.C.	62.5%	-30.9%	18.0%	-15.5%	-10.9%	-44.7%
--Cost of Production in Belgium	59.1%	-5.7%	na	na	-7.7%	-45.7%

<u>b) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) not over 40 united inches included in item 542.1100, TSUSA, and is compared to the following:</u>						
--Belgian home market price	-5.5%	-60.3%	24.8%	-69.9%	-34.7%	-79.3%
--Export price to E.C.	-17.3%	-75.7%	-8.9%	-77.9%	-51.8%	-84.5%
--Cost of Production in Belgium	-19.0%	-66.9%	na	na	-50.1%	-84.8%

<u>c) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) over 40 united inches included in item 542.1300, TSUSA, and is compared to the following:</u>						
--Belgian home market price	129.6%	154.3%	99.7%	139.9%	157.8%	162.2%
--Export price to E.C.	101.0%	55.3%	45.6%	75.8%	90.2%	95.7%
--Cost of Production in Belgium	96.8%	112.0%	na	na	96.9%	92.3%

<u>d) Where avg. unit value Belgian exports to U.S. is compared to the following:</u>						
--Belgian home market price	115.3%	84.7%	42.4%	39.3%	34.6%	38.1%
--Export price to E.C.	88.5%	12.8%	3.8%	2.1%	-0.6%	3.1%
--Cost of Production in Belgium	84.6%	54.0%	na	na	2.7%	1.3%

Source notes: BF/m² = Belgian Francs per square meter. Avg. unit value, f.o.b. origin, U.S. imports from U.S. Department of Commerce, Bureau of the Census, IA245XAnn; IM 145X; IM 146. Currency conversions were made according to Federal Reserve Bulletin, various issues. Note that statistics are compiled for sheet glass imports from both Belgium and Luxembourg, but the petitioner knows of no producers of the subject glass in Luxembourg and, therefore, attributes all imports to Belgium. Belgian home market prices, EEC prices, and cost of production taken from market research; note that 1981 figures are for first six months 1981 only. Avg. unit value of exports to U.S. taken from Belgian export statistics as set forth in market research; 1981 figures for first six months 1981 only.

(b) Switzerland

Table 1B, following, compares Swiss home market prices, U.S. import prices, Swiss export prices, prices for sale in the EC, prices for sale to third countries, and Swiss cost of production. As shown in part I, subsections (a) and (b), Swiss home market prices fell during 1982 from SF8.40 per square meter in the first quarter to SF6.20 per square meter in the fourth quarter. Market research attributes this decline in home market prices, and the similar decline in prices to the EC, to the overall recession, the weak Swiss Franc, and the takeover of Elektroverre Romont by Sybron Corporation. Notwithstanding the declining home market prices, however, comparison of those prices or prices for sale in the EC reveals significant margins of dumping throughout 1982. Part II, subsection (d), of Table 1B shows that when home market prices are compared with export prices to the U.S., LTFV margins were present in all four quarters of 1982 ranging from 46.6 percent in the first quarter to 12.5 percent in the fourth quarter.

Subsection (a) of part II of Table 1B likewise reveals LTFV sales in every quarter of 1982, as well as in 1980 and 1981, when home market prices are compared to Department of Commerce, Bureau of the Census data. LTFV margins in 1982 according to this comparison ranged from 56.8 percent in the first quarter to 10.1 percent in the fourth quarter. Moreover, when home market sales are compared to imports of thin glass measuring over 40 united inches, the margins of sales at less than fair value in 1982 ranged from 75.6 percent in the first quarter of 1982 to 22.8 percent in the fourth quarter.

Market research indicates that the major portion of Swiss thin glass exported to the United States is in calibrated thicknesses of 0.92 to 1.05 millimeters or 1.2 to 1.32 millimeters. These thicknesses correspond approximately to standard micro and lantern slide as defined in section (4). Comparison of the home market prices in these particular high-volume thicknesses reveals LTFV sales in all quarters of 1982 by margins ranging from 51.4 percent to 6.1 percent. See Table 1B, part II, subsection (a).

Table 1B

Comparison of Swiss, FOB Origin, Import
Prices with Swiss Home Market Prices, Third
Country Prices, and Swiss Cost of Production
for Thin Sheet Glass
(1980 - 4th Qtr 1982)

	1980 (SF/m ²)	1981 (SF/m ²)	1982			
			1st Qtr (SF/m ²)	2nd Qtr (SF/m ²)	3rd Qtr (SF/m ²)	4th Qtr (SF/m ²)
Part I: Sales prices and cost of production:						
a) Swiss prices for Export to U.S. and other countries compared with home market prices, E.C. prices, and costs of production (for thin sheet glass 0.7mm - 1.5mm (+/- 0.1mm) in thickness):						
Avg. Unit Value, f.o.b. origin, U.S. imports (not over 40 united inches)	3.04	3.34	3.17	3.63	3.47	3.77
(over 40 united inches)	3.22	3.94	3.51	3.75	3.72	4.16
Avg. Unit Value, Swiss Exports to U.S.	2.83	2.98	2.83	3.27	3.34	3.38
Swiss home market price (0.8mm - 1.5mm thickness)	3.38	3.77	3.39	3.36	3.58	3.69
(0.92mm - 1.05mm and 1.2mm - 1.32 thickness)	5.73	6.30	4.97	4.77	4.73	4.15
Export price to E.C.	na	na	4.80	4.60	4.55	4.00
Export price to other countries	5.66	5.23	4.97	4.77	4.73	4.15
Cost of Production in Switzerland	4.85	4.97	na	na	na	na
	3.40	3.66	na	na	3.45	3.45
b) Swiss home market prices:						
--0.6mm - 0.8mm thickness:	7.90	8.90	8.40	7.10	7.10	6.20
--0.8mm - 1.0mm thickness:	5.80	6.30	5.00	4.80	4.75	4.15
--0.92mm - 1.05mm thickness*:	na	na	4.70	4.50	4.45	3.90
--1.0mm - 1.2mm thickness:	5.40	6.00	4.80	4.60	4.55	4.00
--1.2mm - 1.32mm thickness*:	na	na	4.90	4.70	4.65	4.10
--1.3mm - 1.5mm thickness:	6.00	6.60	5.10	4.90	4.90	4.30
--0.8mm - 1.5mm thickness:	5.73	6.30	4.97	4.77	4.73	4.15
--0.92mm - 1.05mm and 1.2mm - 1.32 thickness:	na	na	4.80	4.60	4.55	4.00
c) Swiss Export price to E.C.:						
--0.6mm - 0.8mm thickness:	6.60	7.20	8.50	8.00	8.00	7.10
--0.8mm - 1.0mm thickness:	4.85	5.35	5.00	4.80	4.75	4.15
--1.0mm - 1.2mm thickness:	4.40	4.80	4.80	4.60	4.55	4.00
--1.3mm - 1.5mm thickness:	4.65	5.10	5.10	4.90	4.90	4.30
--0.7mm - 1.5mm (+/- 0.1mm) thickness:	5.66	5.23	5.85	5.58	5.55	4.89
d) Swiss Cost of Production:						
--0.6mm - 0.8mm thickness:	3.56	3.83	na	na	3.61	3.61
--0.8mm - 1.0mm thickness:	3.56	3.83	na	na	3.61	3.61
--1.0mm - 1.2mm thickness:	3.24	3.48	na	na	3.29	3.29
--1.3mm - 1.5mm thickness:	3.24	3.48	na	na	3.29	3.29
--0.7mm - 1.5mm (+/- 0.1mm) thickness:	3.40	3.66	na	na	3.45	3.45

Table 1B (cont.)

Comparison of Swiss, FOB Origin, Import
Prices with Swiss Home Market Prices, Third
Country Prices, and Swiss Cost of Production
for Thin Sheet Glass
(1980 - 4th Qtr 1982)

	1980 (SF/m ²)	1981 (SF/m ²)	1982			
			1st Qtr (SF/m ²)	2nd Qtr (SF/m ²)	3rd Qtr (SF/m ²)	4th Qtr (SF/m ²)
<u>Part II: Margins of Sales at Less than Fair Value:</u>						
<u>a) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) included in items 542.1100 and .1300, TSUSA, and is compared to the following:</u>						
--Swiss home market price (0.8mm - 1.5mm thickness)	88.5%	88.6%	56.8%	31.4%	36.3%	10.1%
(0.92mm - 1.05mm and 1.2mm - 1.32 thickness)	na	na	51.4%	26.7%	31.1%	6.1%
--Export price to E.C.	86.2%	56.6%	56.8%	31.4%	36.3%	10.1%
--Export price to other countries	59.5%	48.8%	na	na	na	na
--Cost of Production in Switzerland	11.8%	9.6%	na	na	-0.5%	-8.4%

<u>b) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) not over 40 united inches included in item 542.1100, TSUSA, and is compared to the following:</u>						
--Swiss home market price (0.8mm - 1.5mm thickness)	78.0%	59.9%	41.6%	27.2%	27.2%	-0.1%
(0.92mm - 1.05mm and 1.2mm - 1.32 thickness)	na	na	36.8%	22.7%	22.3%	-3.7%
--Export price to E.C.	75.8%	32.7%	41.6%	27.2%	27.2%	-0.1%
--Export price to other countries	50.6%	26.1%	na	na	na	na
--Cost of Production in Switzerland	5.6%	-7.0%	na	na	-7.2%	-17.0%

<u>c) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) over 40 united inches included in item 542.1300, TSUSA, and is compared to the following:</u>						
--Swiss home market price (0.8mm - 1.5mm thickness)	102.5%	111.4%	75.6%	45.9%	41.6%	22.8%
(0.92mm - 1.05mm and 1.2mm - 1.32 thickness)	na	na	69.6%	40.7%	36.2%	18.3%
--Export price to E.C.	100.0%	75.5%	75.6%	45.9%	41.6%	22.8%
--Export price to other countries	71.4%	66.8%	na	na	na	na
--Cost of Production in Switzerland	20.1%	22.8%	na	na	3.3%	2.1%

Table 1B (cont.)

Comparison of Swiss, FOB Origin, Import
Prices with Swiss Home Market Prices, Third
Country Prices, and Swiss Cost of Production
for Thin Sheet Glass
(1980 - 4th Qtr 1982)

	1980 (SF/m ²)	1981 (SF/m ²)	1982			
			1st Qtr (SF/m ²)	2nd Qtr (SF/m ²)	3rd Qtr (SF/m ²)	4th Qtr (SF/m ²)
<u>Part II: Margins of Sales at Less than Fair Value (continued):</u>						
d) Where avg. unit value Swiss exports to U.S. is compared to the following:						
--Swiss home market price (0.8mm - 1.5mm thickness)	69.5%	67.1%	46.6%	42.0%	32.1%	12.5%
(0.92mm - 1.05mm and 1.2mm - 1.32 thickness)	na	na	41.6%	36.9%	27.1%	8.4%
--Export price to E.C.	67.5%	38.7%	46.6%	42.0%	32.1%	12.5%
--Export price to other countries	43.5%	31.8%	na	na	na	na
--Cost of Production in Switzerland	0.6%	-2.8%	na	na	-3.5%	-6.4%

* Shipments of thin glass which fall within this thickness range accounted for the major volume of shipments by Erie-Electroverre.

Source notes: SF/m² = Swiss Francs per square meter. Avg. unit value, f.o.b. origin, U.S. imports from U.S. Department of Commerce, Bureau of the Census, IA245XAnn; IM 145X; IM 146. Currency conversions were made according to Federal Reserve Bulletin, Various issues. Swiss home market prices, EC prices, other country prices and cost of production taken from market research; note that 1981 prices are for first half 1981 only. Avg. unit value, exports to U.S. was taken from Swiss export statistics, Tariff Code 7005.01, thin flat glass, not worked, 0.7 mm to 1.5 mm +/- 0.1 mm, as set forth in the market research report; note that 1981 figures are for first six months 1981 only.

(c) West Germany

Table 1C, following, presents the pricing data for West German thin sheet glass sales in the home market and to the United States. As shown, the margins of sales at less than fair value by the West German producer, Flachglas, are even larger than those shown for the Belgian and Swiss producers. Indeed in the second quarter of 1982 the average LTFV margin for West German thin sheet glass imports was over 600 percent. And, comparing West German home market prices for micro glass (0.9 to 1.1 millimeters) also reveals substantial margins of sales at less than fair value.

Market research indicates that these home market prices are for single truckloads (20 to 24 tons) of assorted thicknesses. Where a sale is made to a major home market customer, these prices are up to 15 percent lower, and furthermore, Flachglas extends a three percent discount for payment within 10 days. These reductions to the home market prices set forth in Table 1C, however, will not eliminate the margins of sales at less than fair value.

It should also be noted that, as explained above, a significant portion of West German imports are "Vitover" which is a higher-priced, higher quality thin sheet glass generally shipped in units not over 40 united inches. Thus, the LTFV margins between West German home market prices and import average unit values for thin sheet glass suitable for microscope slides, cosmetic mirrors, and so forth, would be expected to exceed the margins shown in Table 1C when compared to the average home market prices set forth.

Table IC

Comparison of West German, FOB Origin, Import
Prices with West German Home Market Prices, Third
Country Prices, and West German Cost of Production
for Thin Sheet Glass
(1980 - 4th Qtr 1982)

	1981				1982			
	1st Qtr (DM/m ²)	2nd Qtr (DM/m ²)	3rd Qtr (DM/m ²)	4th Qtr (DM/m ²)	1st Qtr (DM/m ²)	2nd Qtr (DM/m ²)	3rd Qtr (DM/m ²)	4th Qtr (DM/m ²)
Part I: Sales prices in the home market and for export to the U.S.:								
Home market prices, ex-works:								
0.6mm - 0.8mm	10.00	10.50	10.60	10.70	10.70	10.70	10.70	10.50
0.8mm - 1.0mm	7.70	8.05	8.15	8.25	8.25	8.25	8.25	8.05
0.9mm - 1.1mm or 1.0mm - 1.2mm	7.60	7.95	8.05	8.10	8.10	8.10	8.10	7.95
1.3mm - 1.5mm	6.80	7.10	7.20	7.25	7.25	7.25	7.25	7.10
0.6mm - 1.5mm	8.11	8.40	8.50	8.58	8.58	8.58	8.58	8.40
Avg. Unit Value,								
fob origin, US Imports	4.67	4.26	3.17	3.61	7.13	2.60	2.52	3.99
--not over 40 united inches	4.66	4.34	3.13	3.68	7.32	3.41	2.71	4.07
--over 40 united inches	4.75	3.98	6.57	3.46	5.26	1.22	1.53	2.98
Part II: Margins of Sales at Less than Fair Value:								
a) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) included in items 542.1100 and .1300, TSUSA, and is compared to the following:								
0.6mm - 1.5mm home market price	73.7%	97.2%	168.1%	137.7%	20.3%	230.0%	240.5%	110.5%
0.9mm - 1.1mm home market price	62.7%	86.6%	153.9%	124.4%	13.6%	211.5%	221.4%	99.2%
b) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) not over 40 united inches included in item 542.1100, TSUSA, and is compared to the following:								
0.6mm - 1.5mm home market price	74.0%	93.5%	171.6%	133.2%	17.2%	151.6%	216.6%	106.4%
0.9mm - 1.1mm home market price	63.1%	83.2%	157.2%	120.1%	10.7%	137.5%	198.9%	95.3%
c) Where avg. unit value, fob origin, US imports, is taken from FAS value, port of origin, for glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) over 40 united inches included in item 542.1300, TSUSA, and is compared to the following:								
0.6mm - 1.5mm home market price	70.7%	111.1%	29.4%	148.0%	63.1%	603.3%	460.8%	181.9%
0.9mm - 1.1mm home market price	60.0%	99.7%	22.5%	134.1%	54.0%	563.9%	429.4%	166.8%

Source notes: DM/m² = German Marks per square meter. Avg. unit value, f.o.b. origin, U.S. imports from U.S. Department of Commerce, Bureau of the Census, IA245XAnn; IM 145X; IM 146. Currency conversions were made according to Federal Reserve Bulletin, Various issues. West German home market prices taken from market research.

(d) Transportation charges

Table 2, following, sets forth the CIF charges for imports of thin sheet glass, both under and over 40 united inches, from Belgium, Switzerland, and West Germany.

Table 2

CIF Charges for Imports of Thin Sheet Glass
from Belgium, Switzerland, and West Germany
(\$/sq. ft.)

	<u>1981</u>	<u>1st Qtr. 82</u>	<u>2nd Qtr. 82</u>	<u>3rd Qtr. 82</u>	<u>4th Qtr. 82</u>
<u>a) Imports of glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) not over 40 united inches included in item 542.1100, TSUSA:</u>					
Belgium	.0565	.0195	.0445	.0242	.0551
West Germany	.0524	.0535	.0384	.0359	.0449
Switzerland	.0290	.0277	.0321	.0347	.0255

<u>b) Imports of glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) over 40 united inches included in item 542.1300, TSUSA:</u>					
Belgium	.0364	.0284	.0320	.0324	.0309
West Germany	.0531	.0628	.0297	.0397	.0308
Switzerland	.0288	.0411	.0259	.0328	.0434

Source: U.S. Department of Commerce, Bureau of the Census.

(8) The volume and value of imports of the merchandise from the country in question in the most recent period:

Table 3, following, sets forth the volume and unit value (landed cost, duty paid) of imports of thin sheet glass from each of the countries covered by this petition. As shown by section 3 of Table 3, imports from Belgium accounted for the greatest quantity of imports of the subject glass products in 1980-1982. Imports from Switzerland accounted for the second-largest import quantity, while imports from West Germany were third but rising. Moreover, in 1982 imports of the glass products covered by items 542.1100 and .1300, TSUSA, from all countries other than Belgium, Switzerland, and West Germany totalled only 285,950 square feet. Stated differently, LTFV imports from the three target countries accounted for 98.7 percent of total imports in 1982.

Table 3 (cont.)

U.S. Imports of Thin Sheet Glass from Belgium,
Switzerland, West Germany and All Countries
(1980 - 4th Qtr. 1982)

	1980	1981	1982	1981				1982			
				1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.
3. Imports of glass, weighing over 4 oz., but not over 12 oz. per sq. ft., (0.483 mm to 1.473 mm) included in items 542.1100 and .1300, TSUSA, from the following countries (continued):											
WEST GERMANY											
--quantity (000's ft. ²)	2,677.64	2,494.53	3,956.66	477.37	818.57	455.87	742.73	635.19	1,733.80	848.13	739.53
--landed cost (\$/ft. ²)	\$0.5694	\$0.5901	\$0.4929	\$0.7526	\$0.6256	\$0.4342	\$0.5421	\$0.9816	\$0.3692	\$0.3469	\$0.630
--% change in quantity:											
1980-1982			47.8%								
1981-1982			58.6%								
TOTAL ALL COUNTRIES											
--quantity (000's ft. ²)	24,234.50	20,916.00	22,625.50	5,240.52	6,708.99	5,098.48	3,867.97	4,313.48	7,893.87	5,953.38	4,464.75
--% change in quantity:											
1980-1982			-6.6%								
1981-1982			8.2%								

Source: U.S. Department of Commerce, Bureau of the Census. Import Statistics converted from pounds to square feet by conversion factor of 2.75kg per square meter given by market research.

(9) The names and addresses of enterprises believed to be importing the merchandise.

DeGorter and Company (Agent for Belgian glass)
1044 Northern Boulevard, Roslyn
Long Island, New York 11576

Crystal International Corporation (Agent for
German glass)
One World Trade Center
New York, New York 11576

Erie Scientific
Sybron Corporation
Portsmouth Industrial Park
Portsmouth, New Hampshire 03801

Interglas Corporation (Agent for
Erie-Electroverre)
248-28 Bay View Avenue
Douglas Manor
New York, New York 11363

Market research indicates that Erie-Electroverre, while owned by Sybron Corporation, will ship thin glass to competitors of Erie Scientific, handled sometimes directly or through their agent Interglas Corporation. Erie Scientific produces microscope slides and covers in the United States, and is thus a competitor of other U.S. producers of microscope slides and covers to whom Erie-Electroverre sells imported thin sheet glass.

(10) The names and addresses of other enterprises in the United States engaged in the production, manufacture or sale of like merchandise:

See section (2), supra.

(11) Information as to the material injury or threat thereof to, or the material retardation of the establishment of, a United States industry by reason of the imported merchandise alleged to be sold at less than fair value, as described in 19 C.F.R. §§ 207.11 and 207.26:

In the recent injury determination concerning Certain Carbon Steel Products from Spain, Chairman Eckes and Commissioner Haggart noted their reluctance to cumulate in any prior investigation and indicated that their determination was made on a case-by-case basis. USITC Pub. No. 1331 at 14-15 (December 1982). Rather than cumulate imports from several countries, the Commissioners treated imports from each country as contributory factors or conditions of trade in the marketplace. Id.; see also Additional Views of Commissioner Haggart at 36-37. In the investigation of thin sheet glass from Belgium, Switzerland, and West Germany, the U.S. International Trade Commission ("ITC") should cumulate imports from all three target countries because it is the aggregate presence of imports from Belgium, Switzerland, and West Germany which causes material injury to the domestic industry. See, USITC Pub. No. 1221 at 100.

In the preliminary determination in the European steel cases, Chairman Alberger and Commissioners Stern and Eckes listed eight factors and conditions which might combine to create a "hammering effect" on the domestic industry: the volume of imports, the trend of import volume, fungibility of imports, competition in the marketplace for the same end-users, common channels of distribution, pricing similarity, simultaneous impact, and any coordinated action by importers from various countries. USITC Pub. No. 1221, vol. 1 at 16-17. In the sections which

follow, Jeannette presents information showing that the volume of imports from Belgium, Switzerland, and West Germany, taken singly or together, is significant and that the trend of imports is that of rising penetration of the shrinking domestic marketplace (Table 4, infra); that the prices of imports from these countries are similar (Table 5, infra); and, that there is a simultaneous impact of unfairly-traded imports from these countries on the domestic market for thin sheet glass.

In the words of the Appellate Term, First Division, U.S. Customs Court:

[A]n investigation of imports from only one country, in disregard of the effect on the market area in question, of sales at less than fair value from other countries, would result in a study and conclusions that would be myopic and unrealistic. An investigation so limited and restricted would not help achieve the statutory remedy envisaged by the enabling legislation. It would seem clear that the mischief that the act aimed to remedy required a broad solution. Surely the Congress did not seek to fashion a remedy to the problem of dumping "by solutions only partially effective."

City Lumber Co. v. United States, 64 Cust. Ct. 826, 836-37, 311 F. Supp. 340, A.R.D. 269 (1970), affirmed, 59 C.C.P.A. (Customs) 89, 457 F.2d 991, C.A.D. 1045 (1972).

Cumulation in this investigation need not and should not preclude analysis of imports from Belgium, Switzerland, and West Germany which, as shown below, are each a cause of injury regardless of the other two. Cumulation simply reflects the fact that imports from these sources are fungible, are priced near the same levels, and otherwise cumulatively injure the domestic industry.

Thin Sheet Glass from Belgium,
Switzerland, and West Germany
March 16, 1983

Public Version

(a) The volume of imports of the merchandise which is the subject of this petition is significant:

(i) in absolute terms.

Table 3, supra, showed that imports of thin glass from Belgium, Switzerland, and West Germany together accounted for over 90 percent of all imports in 1982. As shown by section 1 of Table 3, imports of thin glass not over 40 united inches from Belgium increased 34 percent, from Switzerland increased 49.6 percent, and from West Germany increased 52.3 percent between 1981 and 1982. Imports of thin glass over 40 united inches from Belgium increased 3.8 percent, from Switzerland decreased 37.3 percent, and from West Germany increased 85.2 percent between 1981 and 1982. Thus, in absolute terms imports from Belgium and West Germany increased between 1981 and 1982, while imports from Switzerland declined roughly 10 percent overall (due to rebuilding of the Swiss plant). Given that Belgium, Switzerland, and West Germany rank one, two, and three, respectively, as import suppliers of thin sheet glass, the volume of imports, in absolute terms, are "significant" within the meaning of section 771(7)(C)(i) of the Act.

(ii) relative to apparent domestic consumption, domestic shipments, and domestic production.

"Business Confidential" Table 4 sets forth domestic shipments, U.S. exports, and domestic production figures for 1980, 1981, and 1982. As shown in section (b) of Table 4, apparent domestic consumption increased slightly between 1980 and 1981, and decreased in 1982 by []

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percent from the 1981 level. Jeannette Sheet Glass Corporation did not start production until March 1980, and in 1980 Jeannette's market share amounted to [] percent. In 1981, though, Jeannette improved its position and captured [] percent of domestic consumption. Increased import competition in 1982 from LTFV imports from Belgium, Switzerland, and West Germany captured [] percent of domestic consumption in 1982, up from [] percent in 1981. Section (f) of Table 4 shows that imports from Belgium, Switzerland, and West Germany accounted for over 98 percent of all imports. Thus, the less-than-fair-value imports from the three target countries accounted for virtually all of the increased market penetration by imports which caused a corresponding decrease in Jeannette's market share from [] percent in 1981 to [] percent in 1982.

Table 4 also shows Jeannette's shipments, production, and exports for nine months of 1981 and nine months of 1982. These figures provide a further comparison with the 1980 data, which as noted above represent at most only ten months of production and sales.

Imports from West Germany show the greatest increases in market penetration, from [] percent in 1980 to [] percent in 1982. Imports from Belgium and Switzerland maintained their strong positions in the U.S. market, accounting for [] percent and [] percent of apparent domestic consumption respectively.

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Unfair import competition thus has forced Jeannette's market share [

] The domestic industry must compete fairly in a market dominated by Glaverbel, Erie-Electroverre, and Flachglas. Less-than-fair-value imports from these sources have enabled these companies to maintain their dominance in the U.S. market and to prevent further penetration by Jeannette Sheet Glass. The increase in market penetration by imports from all three countries in 1982 attests to the material injury inflicted upon the domestic industry by these imports.

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Table 4

U.S. Imports; Jeannette Sheet Glass Corporation
Shipments, Production, and Exports; and Apparent Domestic
Consumption of Thin Sheet Glass: 1980 - 1982
(Quantity = 000's sq. ft.)

	<u>1980</u>	<u>1981</u>	<u>1982</u>	<u>9 months 1981</u>	<u>9 months 1982</u>
<u>a) U.S. Imports from:</u>					
Belgium	12,411.7	9,658.0	10,688.8	8,043.8	9,144.0
Switzerland	8,867.3	8,577.0	7,694.1	7,066.9	5,583.5
West Germany	2,677.6	2,494.5	3,956.7	1,751.8	3,217.1
Subtotal	23,956.6	20,729.5	22,339.6	16,862.5	17,944.6
Total, all imports	24,234.5	20,916.0	22,625.5	17,048.0	18,160.7

<u>b) Apparent U.S. Domestic Consumption:</u>					
Total imports	24,234.5	20,916.0	22,625.5	17,048.0	18,160.7
Domestic shipments	[]
Domestic production	[]
U.S. exports	[]
Apparent U.S. Consumption	[]

<u>c) Imports from Belgium as a percent of:</u>					
--Apparent Consumption	[]
--Domestic shipments	[]
--Domestic production	[]
--All imports	51.2%	46.2%	47.2%	47.2%	50.4%
<u>d) Imports from Switzerland as a percent of:</u>					
--Apparent Consumption	[]
--Domestic shipments	[]
--Domestic production	[]
--All imports	36.6%	41.0%	34.0%	41.5%	30.7%

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Table 4 (cont.)

U.S. Imports; Jeannette Sheet Glass Corporation
Shipments, Production, and Exports; and Apparent Domestic
Consumption of Thin Sheet Glass: 1980 - 1982
(Quantity = 000's sq. ft.)

	<u>1980</u>	<u>1981</u>	<u>1982</u>	<u>9 months 1981</u>	<u>9 months 1982</u>
<u>e) Imports from West Germany as a percent of:</u>					
--Apparent Consumption	[]
--Domestic shipments	[]
--Domestic production	[]
--All imports	11.0%	11.9%	17.5%	10.3%	17.7%
<u>f) Imports from Belgium, Switzerland, and West Germany as a percent of:</u>					
--Apparent Consumption	[]
--Domestic shipments	[]
--Domestic production	[]
--All imports	98.9%	99.1%	98.7%	98.9%	98.8%
<u>g) All imports as a percent of:</u>					
--Apparent Consumption	[]
--Domestic shipments	[]
--Domestic production	[]
<u>h) Jeannette Sheet Glass as a percent of:</u>					
--Apparent Consumption	[]

* Jeannette did not begin production until March 1980.

Source: U.S. Department of Commerce, Bureau of the Census; Jeannette Sheet Glass Corporation.

(b) Imports of thin glass from Belgium, Switzerland, and West Germany have significantly undercut the price of like merchandise produced in the United States.

The Commission's staff, in Clear Sheet Glass from Romania, concluded that "[t]he selection of one type of flat glass over another is based on both quality and price; price is often the predominant factor, particularly when small surfaces are involved." USITC Pub. No. 811 at A-7. In the marketplace for thin sheet glass, and particularly for thin sheet glass suitable for microscope slides and microcovers, price is the predominant factor. Thus, the substantial margins of underselling by LTFV imports in competition with the sole domestic producer have enabled the imports to increase their strong position in the domestic market.

"Business confidential" Table 5, below, shows that the landed costs, duty paid, of imports from Belgium, Switzerland, and West Germany were substantially below domestic list prices and were also below domestic realized prices in 1980, 1981, and 1982. The overcoverage of the Commerce Department statistics with respect to the category of glass covered by this petition, however, makes meaningful comparison difficult and requires careful attention be paid to the figures being compared. Table 5, section (c)(i) compares landed costs of imports with the list prices set forth in Exhibit 2 to the petition. List prices for the lowest priced glass in a particular thickness category were chosen so that the landed costs of imports which include all of the types of glass mentioned above in section (4) are compared only to the lowest list prices of Jeannette glass. Yet, this comparison reveals very large margins of underselling by all three of the importing countries: 120.5

percent by Belgian imports in 1982, 96.4 percent by Swiss imports in 1982, and 48.9 percent by West German imports in 1982.

The average prices actually realized by Jeannette on sales in 1980, 1981, and 1982, are similarly compared to import landed costs in section (c)(ii) of the table. Again, comparison discloses significant margins of underselling by Belgian, Swiss, and West German imports in 1982. Moreover, given the use of Commerce Department data which include thin glass for use in photographic slides, LED and LCD applications, and other technical and scientific applications, the average landed costs of imports from West Germany and Belgium overstate the landed costs of imports of thin glass of the type specified in this petition.

The margins of underselling of imported glass versus Jeannette's glass also are indicative of the substantial downward pressure exerted on Jeannette's pricing levels by the LTFV imports. The increased market penetration of the three major importing countries of thin glass reflects the presence of substantial lost sales due to the lower prices of the imports.

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Table 5

Underselling by Imports from Belgium, Switzerland, and West Germany -
Jeannette Sheet Glass Prices Compared with Import Landed Cost, Duty Paid, Prices

	1980	1981	1982	1981				1982			
				1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.
a) Domestic Prices:											
(1) List price, large orders over 31 united inches ¹ :											
--Micro slide	\$0.3920	\$0.4378	\$0.4480	\$0.4070	\$0.4480	\$0.4480	\$0.4480	\$0.4480	\$0.4480	\$0.4480	\$0.4480
--Lantern slide	\$0.3747	\$0.4223	\$0.4320	\$0.3930	\$0.4320	\$0.4320	\$0.4320	\$0.4320	\$0.4320	\$0.4320	\$0.4320
--Photo	\$0.3090	\$0.3518	\$0.3600	\$0.3270	\$0.3600	\$0.3600	\$0.3600	\$0.3600	\$0.3600	\$0.3600	\$0.3600
(11) Jeannette's average realized prices	[]							
<hr/>											
b) Landed Cost, Duty Paid, of imports of glass, weighing over 4 oz., but not over 12 oz. per sq. ft., over 40 united inches included in item 542.1300, TSUSA, from the following countries:											
--Belgium	\$0.2105	\$0.1949	\$0.1633	\$0.2285	\$0.1985	\$0.1677	\$0.1617	\$0.1753	\$0.1669	\$0.1546	\$0.1556
--Switzerland	\$0.1826	\$0.1703	\$0.1833	\$0.1801	\$0.1691	\$0.1660	\$0.1693	\$0.1841	\$0.1840	\$0.1775	\$0.1893
--West Germany	\$0.6781	\$0.5741	\$0.2418	\$0.7649	\$0.5809	\$0.9021	\$0.5234	\$0.7463	\$0.1855	\$0.2274	\$0.3940
<hr/>											
c) Margins of Underselling											
(1) Jeannette's lowest list price compared to imports from:											
Belgium											
--\$ margin	\$0.0985	\$0.1569	\$0.1967	\$0.0985	\$0.1615	\$0.1923	\$0.1983	\$0.1847	\$0.1931	\$0.2054	\$0.2044
--% margin	46.8%	80.5%	120.5%	43.1%	81.4%	114.7%	122.6%	105.4%	115.7%	132.9%	131.4%
Switzerland											
--\$ margin	\$0.1264	\$0.1815	\$0.1767	\$0.1469	\$0.1909	\$0.1940	\$0.1907	\$0.1759	\$0.1760	\$0.1825	\$0.1707
--% margin	69.2%	106.6%	96.4%	81.6%	112.9%	116.9%	112.6%	95.5%	95.7%	102.8%	90.2%
West Germany											
--\$ margin	\$-0.3691	\$-0.2223	\$0.1182	\$-0.4379	\$-0.2209	\$-0.5421	\$-0.1634	\$-0.3863	\$0.1745	\$0.1326	\$-0.0340
--% margin	-54.3%	-38.6%	48.9%	-57.1%	-37.9%	-60.0%	-31.1%	-51.7%	94.1%	58.3%	-8.5%

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Table 5 (cont.)

Underselling by Imports from Belgium, Switzerland, and West Germany
Jeannette Sheet Glass Prices Compared with Import Landed Cost, Duty Paid, Prices

	1980	1981	1982	1981				1982			
				1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.
<u>c) Margins of Underselling</u>											
(ii) Jeannette's average realized price compared to imports from:											
Belgium											
--\$ margin	[]
--% margin	[]
Switzerland											
--\$ margin	[]
--% margin	[]
West Germany											
--\$ margin	[]
--% margin	[]

Source and methodology notes: Domestic list prices taken from published price lists for Jeannette Sheet Glass attached in Exhibit 2. List prices for micro and lantern glass are for 31-50 united inches in pallets of 6000 sq. ft. List prices for photo glass are for 31-60 united inches in pallets of 5000 sq. ft. Import statistics from U.S. Department of Commerce, Bureau of the Census, IM 145, 156, for entries under item 542.1300, which includes glass over 4" united inches. Domestic average realized prices from Jeannette Sheet Glass Corporation, import landed costs given by quarter in section (c)(ii) compared annual average realized prices for Jeannette Sheet Glass.

(b) The effect of imports of such merchandise imported from Belgium, Switzerland, and West Germany otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.

The less-than-fair-value glass imported from Belgium, Switzerland, and West Germany not only enables the importers to capture a larger market share, see supra section (11)(a), but depresses Jeannette's prices and forces the domestic industry to repeatedly forego price hikes notwithstanding rising costs of production. As shown above in Table 5, Jeannette's list prices have risen little since 1980 and have not risen at all since January 28, 1982. The ultimate effect is declining profits, productivity, return on investment and capacity utilization as shown infra in section (11)(d).

As Chairman Eckes and Commissioner Haggart stated in their recent opinion concerning steel products from Spain:

In a market where discounting is now commonplace, the mere presence of an offer from an importer of steel at a low price can have a discernible impact. Such offers affect the ability of the domestic steel producer to price competitively to cover fixed costs, and to generate funds for needed capital improvements.

USITC Pub. No. 1331 at 17.

In the thin glass market, as in the steel market, price is the primary factor from the purchasers' standpoint. Thus, offers of thin glass at low prices by foreign producers impact the price that Jeannette can charge and still remain competitive. "Business Confidential" Table 6, following, shows the price depression caused by imports from each of the three target countries in direct competition with Jeannette at particular accounts.

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Table 6

Price Suppression and Depression
Competition From Imported Thin Sheet Glass

<u>Date</u>	<u>Customer</u>	<u>Location</u>	<u>Foreign Produced Thin Sheet Glass</u>			<u>Comparable Product Produced by Jeannette</u>				
			<u>Country of Origin</u>	<u>Producer</u>	<u>Quantity Offered</u>	<u>Price Offered</u>	<u>Quantity Sold</u>	<u>Price of Prior Sale*</u>	<u>Price at which sold to meet competition</u>	<u>Lost Revenue^a</u>
1983			Switzerland	Electroverre						
1982			Switzerland	Electroverre						
			W. Germany	Flachglas						
			W. Germany	Flachglas						
			W. Germany	Flachglas						
1981			Belgium	Glaverbel						
			Switzerland	Electroverre						
			Switzerland	Electroverre						
			Switzerland	Electroverre						
1980			Belgium	Glaverbel						
			Switzerland	Electroverre						
			Switzerland	Electroverre						
			Switzerland	Electroverre						
			Switzerland	Electroverre						
			W. Germany	Flachglas						
			Switzerland	Electroverre						
			Switzerland	Electroverre						
			Switzerland	Electroverre						
			W. Germany	Glaverbel						

* Last previous sale of thin sheet glass to particular customer shown.

Source: Jeannette Sheet Glass Corporation. Prices are delivered prices; FCL = full container load; Lost Revenue = difference between price of prior sale and price of instant sale times quantity sold in instant transaction.

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(c) Imports of thin sheet glass have caused an actual decline in output, market share, profits, productivity, return on investment, and utilization of capacity.

Jeannette's decline in shipments and substantial loss of market share were analyzed above in section (11)(a). As shown by "Business Confidential" Table 4, domestic shipments declined by [] percent, from [] million square feet in 1981 to [] million square feet in 1982. Domestic consumption, on the other hand, declined by only [] percent between 1981 and 1982, and imports from Belgium, Switzerland, and West Germany increased by 7.8 percent from 20.9 million square feet in 1981 to 22.6 million square feet in 1982. The LTFV imports, thus, increased their market penetration in the declining domestic market at the expense of the output and market share of Jeannette Sheet Glass Corporation.

The loss of sales revenue accompanying Jeannette's reduced output and loss of market share has adversely impacted Jeannette's profits on thin sheet glass operations in 1982. "Business Confidential" Table 7, following, presents Jeannette's profit and loss data for thin sheet glass operations in 1980, 1981, and the first nine months of 1982. As shown, profits in the first nine months of 1981 were []. With the loss of output and market share due to LTFV imports, however, profits in the first nine months of 1982 declined by [] percent to [].

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Table 7

Jeannette Sheet Glass Corporation
Thin Sheet Glass Operations
Profitability: 1980 - 9 months 1982

	<u>1980</u>	<u>1981</u>	<u>9 mos. 1981</u>	<u>9 mos. 1982</u>
Net Sales (less discounts, returns allowances, and pre-paid freight)	[]
Cost of Goods Sold	[]
--Raw Materials	[]
--Direct Labor	[]
--Other Factory Costs	[]
Cost of Goods Sold	[]
Gross Profit (or Loss)	[]
Administrative Expenses	[]
Net Operating Profit	[]
Other Income and (other expense) Net	[]
Net Profit (or loss) before Federal and other income taxes	[]
Net Profit (or loss) before taxes as a percent of Net Sales	[]

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The increased market penetration by imports during 1982 also caused Jeannette to reduce production relative to capacity to produce thin sheet glass. Table 8, below, shows that utilization of capacity by Jeannette Sheet Glass fell from [] percent in the first nine months of 1981 to [] percent in the first nine months of 1982, []

Table 8

Underutilization of Production Capacity
Jeannette Sheet Glass Corporation
1980 - 9 months 1982

	<u>1980</u>	<u>1981</u>	<u>9 mos. 1981</u>	<u>9 mos. 1982</u>
<u>Photo</u>				
Production (Units)	[]
Capacity	[]
Capacity Utilization (%)	[]
Index (1980 = 100)	100.0	277.4	289.8	276.3
<u>Lantern Slide</u>				
Production (Units)	[]
Capacity	[]
Capacity Utilization (%)	[]
Index (1980 = 100)	100.0	154.1	158.8	72.2
<u>Standard Micro</u>				
Production (Units)	[]
Capacity	[]
Capacity Utilization (%)	[]
Index (1980 = 100)	100.0	76.5	73.5	47.3

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Table 8 (cont.)

Underutilization of Production Capacity
Jeannette Sheet Glass Corporation
1980 - 9 months 1982

	<u>1980</u>	<u>1981</u>	<u>9 mos. 1981</u>	<u>9 mos. 1982</u>
<u>Total, thin glass</u>				
Production	[]
Capacity	[]
Capacity utilization	[]
Index (1980 = 100)	100.0	115.2	116.4	64.8

Source: Jeannette Sheet Glass Corporation.

In short, LTFV imports from Belgium, Switzerland, and West Germany have increased their presence in the domestic thin sheet glass market, thereby causing the sole domestic producer to reduce output, to suffer a substantial decline in profits, and to operate at a greatly reduced level of capability utilization.

(d) The low prices and increasing market penetration of LTFV imports from Belgium, Switzerland, and West Germany have had a negative effect upon the cash flow, inventories, employment, and growth of the domestic industry.

"Business Confidential" Table 7, above showed the decline in profits experienced by Jeannette's thin sheet glass operations between 1981 and 1982. This decline in net operating profits parallels a decline in gross profits shown in Table 7. During the first nine months of 1982, Jeannette's gross profits stood at [] down from [] during the same period of 1981. This is indicative of the cash flow shortfall

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experienced by Jeannette in 1982 relative to the prior year.

Jeannette's closing inventory of finished thin sheet glass goods in 1980 was valued at []. In 1981, Jeannette's closing inventory was valued at [], and at the end of three quarters of 1981, its inventory was []. From these levels, Jeannette's closing inventory after three quarters of 1982 fell to []. This represents a decline of [] percent between 1982 and the same period in 1981 and represents a [] percent decline from 1980.

Employment and man-hours worked by production workers also fell during the first nine months of 1982 to levels below 1980 and 1981. Table 9, below, shows that in the first nine months of 1982, the number of production workers employed by Jeannette was only slightly over half the number employed in 1980 and in 1981.

Table 9

Jeannette Sheet Glass Corporation
Employment and Man-Hours Worked
By Production Workers

	<u>1980</u>	<u>1981</u>	<u>9 mos. 1981</u>	<u>9 mos. 1982</u>
Production and related workers engaged in the production of:				
--Photo	[]
--Lantern slide	[]
--Standard micro	[]
--Total	[]
Index (1980 = 100)	100.0	102.9	106.8	56.3

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Table 9 (cont.)

Jeannette Sheet Glass Corporation
Employment and Man-Hours Worked
By Production Workers

	<u>1980</u>	<u>1981</u>	<u>9 mos. 1981</u>	<u>9 mos. 1982</u>
Man-hours worked by production and related workers:				
--Photo	[]
--Lantern slide	[]
--Standard micro	[]
--Total	[]
Index (1980 = 100)	100.0	140.9	104.0	57.1

Source: Jeannette Sheet Glass Corporation.

Table 9 also shows the impact of the influx of less-than-fair-value imports from Belgium, Switzerland, and West Germany on the man-hours worked by Jeannette's thin sheet glass production workers. By calculating the man-hours required in 1982 per ton of thin sheet glass shipped by Jeannette--[]-- it can readily be seen that the increase in imports from the three target countries between the first nine months of 1981 and the first nine months of 1982 (see Table 4 supra) of 1,082,100 square feet equates to a loss in man-hours worked by Jeannette Sheet Glass production workers of [] man-hours.

The increase of imports of thin sheet glass from Belgium, Switzerland, and West Germany into the U.S. market, the current dominant market position of the three principal importing firms in the U.S.

market, and the ability and motivation of these importers to increase the level of market penetration have materially injured the sole domestic producer of thin sheet glass, as shown by the decline in output, profits, capability utilization, cash flow, and employment experienced by Jeannette Sheet Glass Corporation. With respect to the future ability of Jeannette to compete in the thin sheet glass market, Jeannette has been unable to undertake research and development due to shrinking sales volume in the wake of increasing import penetration.

(e) Summary and Conclusion

The foregoing data and analysis establish that--

(i) imports of thin sheet glass from Belgium, Switzerland, and West Germany are significant in volume, in their increase, as a proportion of domestic production in 1982 as compared with 1980 and 1981 and of apparent domestic consumption in 1982 as compared with 1980 and 1981;

(ii) imports have significantly undercut the price of domestic thin sheet glass;

(iii) imports of thin sheet glass have adversely impacted the domestic industry as shown by--

(a) an actual decline in output and market share relative to such imports,

(b) a sharp decline in profits,

(c) a utilization of production capacity which has been and remains depressed below the levels of capacity utilization on the sole domestic producer in 1980 and 1981;

(d) a decline in cash flow, and

(e) an adverse effect on average employment and
production worker man-hours in the industry.

(iv) These facts amply satisfy the statutory definition of material injury in that they show that, given the conditions of competition in the United States, the domestic industry has sustained material injury by reason of imports from Belgium, Switzerland, and West Germany in that the injury caused Jeannette Sheet Glass Corporation by the LTFV imports is not inconsequential, immaterial, or unimportant. The price depression, loss of sales caused by less-than-fair-value imports and the loss of the substantial and increasing volume of sales captured by such imports in a domestic market of declining demand is a cause of the decline in profits, working capital and wages of production workers--and thus of material injury--which meets the congressional intent of causation. Dumped imports need not be the principal, a substantial, or even a significant cause of material injury, but only a contributing cause in light of the market conditions impacting a domestic industry. See, S. Rep. 96-249, July 17, 1979, at 57; and see S. Rep. 93-1298, Nov. 26, 1974, at 180.

(v) Accordingly, the petitioners believe that the facts presented and analyzed in this petition justify the conclusion that the material injury test of the antidumping law is satisfied.

(12) Supporting documentation

The petitioner has marshalled information from a variety of sources, public and private, which are presented in the petition with

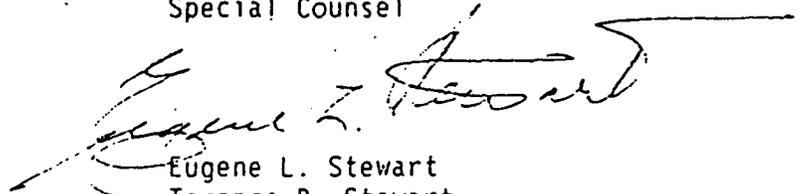
appropriate source citations. These data support the allegations of the petitioner. Documentation from private sources are included as exhibits to this petition, or in the case of the market research report, are submitted separately under request for confidential treatment.

(13) Conclusion

The information presented in this petition supports its allegation that certain thin sheet glass products manufactured in Belgium, Switzerland, and West Germany are being sold in the United States at less than fair value, and that the domestic industry has been materially injured by these imports. The petitioner therefore respectfully requests that the ITA initiate an investigation to determine the amount of the margin of dumping, and to impose upon this merchandise, in addition to any other duty imposed, an antidumping duty equal to the amount of the dumping margin.

Respectfully submitted,
Jeannette Sheet Glass Corporation

By: Law Offices of Eugene L. Stewart
Special Counsel



Eugene L. Stewart
Terence P. Stewart
James R. Cannon, Jr.

Of Counsel:

Ronald C. Makoski, Esq.
General Counsel
Jeannette Sheet Glass Corporation
P.O. Box 739
Jeannette, Pennsylvania 15644

Public Version Exhibit 1

Re Conf: 83-78

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KATHLEEN T. WEAVER
ROBERT E. RUOGERI

March 28, 1983

Hand delivered

Sheet # 923

Mr. Kenneth R. Mason
Secretary, U.S. International
Trade Commission
701 E Street, N.W.
Washington, D.C. 20436

PUBLIC INSPECTION

Dear Mr. Mason:

Re: Thin Sheet Glass from Switzerland, Belgium, and the
Federal Republic of Germany

By letter of March 24, 1983, the Commission denied in part our request for confidential treatment of Exhibit 1 to the petition filed on behalf of Jeannette Sheet Glass Corporation on March 16, 1983. We would agree to release the document which was contained as Exhibit 1 on condition that certain hand-written notations and identifying marks on the letter are masked. Such identifying marks could reveal the source of information, thus causing substantial harm to the competitive position of the person or person(s) supplying the information and impairing the Commission's ability to obtain similar information in the future. 19 C.F.R. 201.6.

Accordingly, we have enclosed a copy of Exhibit 1 with all identifying marks deleted which may be placed in the public file. Please contact us if you determine to release the exhibit as originally submitted so that we may consider whether to withdraw the exhibit.

Sincerely yours,

Eugene L. Stewart
Terence P. Stewart
James R. Cannon, Jr.

93 MAR 28 12:36
FEDERAL TRADE COMMISSION
DOCUMENTS UNIT

RECEIVED



HAPPINESS IS PROSPERITY THROUGH HIGH MOTALE AND PRODUCTIVITY

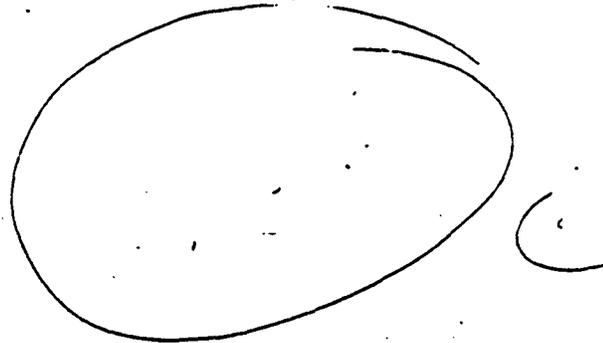
West Virginia Flat Glass, Inc.

P.O. BOX 1840, 1628 ADAMS AVE.
Cable Code: WVFLGS Clarksburg, W.Va.

CLARKSBURG, WV 26301

TEL(304)624-6434

Telex: 68411 WVFLGS CLG



TO THE TRADE:

As you are aware, ASAHI GLASS CO., LTD., a major flat glass manufacturer in Japan, has purchased controlling interest in Hordis Glass, Inc. and changed the name to WEST VIRGINIA FLAT GLASS, INC.

We are pleased to inform you that the plant has already started reconstruction of the tank using the highly improved ASAHI process and is expected to be completed by early May, 1980 with the plant to be in full production by early June, 1980.

Attached is a new price schedule, effective as of the start of production, which covers the following products:

2.0mm (Picture), 2.3mm (Single)
and 3.0mm (Double) in pallets,
boxes and special stock sizes.

We are now accepting orders for delivery beginning June/July 1980. West Virginia Flat Glass representative's in your local area will be calling on you in the near future.

If you have any questions, please contact our Sales Office to discuss your glass needs.

Sincerely,

Edward E. Dutchess
Vice-President, Sales



HAPPINESS & PROSPERITY THROUGH HIGH MOTIVATION AND PRODUCTIVITY

West Virginia Flat Glass, Inc.

P.O. BOX 1840, 1628 ADAMS AVE. CLARKSBURG, WV 26301 TEL(304)624-643-
Cable Code: WVFLGS Clarksburg, W.Va. Telex: 88411 WVFLGS CLC

TO THE TRADE:

Effective with shipments after this date we announce the prices of our Picture Glass (16 cz.), Single Strength (2.3 mm) and Double Strength (3.0 mm). Clear Sheet Glass as follows:

CLEAR SHEET GLASS
PICTURE GLASS (16 oz)
('B' QUALITY)

CUT SIZES

<u>United Inch Bracket</u> <u>(Inclusive)</u>	<u>Sq. Ft. Prices</u> <u>In Pallets</u>	
	<u>Light</u>	<u>Heavy</u>
12" to 15"	\$.307	\$.295
15.1 to 30	.284	.273
30.1 to 60	.258	.248
60.1 to 70	.270	.259
70.1 to 80	.288	.276

NOTE: Prices for 'A' Quality, add 15% to 'B' Quality Prices.

<u>TOLERANCES:</u>	<u>Thickness</u>	<u>Size & Squareness</u>
Cut Size	.071"-.084"	± 1/16"

CLEAR SHEET GLASS
SINGLE STRENGTH (2.3 mm)
('B' QUALITY)

CUT SIZES

<u>United Inch Bracket</u> <u>(Inclusive)</u>	<u>Price Per Box</u>		<u>Sq. Ft. Prices</u> <u>In Pallets</u>	
	<u>50'</u>	<u>100"</u>	<u>Light</u>	<u>Heavy</u>
12" to 15"	\$17.12	-	\$.311	\$.298
15.1 to 30	14.87	-	.273	.263
30.1 to 60	14.60	-	.258	.248
60.1 to 70	15.73	-	.270	.259
70.1 to 80	17.33	-	.288	.276
80.1 to 100	-	\$39.86	.317	.306
100.1 to 120	-	51.10	.355	.340



HAPPINESS PROSPERITY THROUGH HIGH MORALE AND PRODUCTIVITY

West Virginia Flat Glass, Inc.

P.O. BOX 1840, 1628 ADAMS AVE. CLARKSBURG, WV 26301 TEL(304)624-6434
Cable Code: WVFGLS Clarksburg, W.Va. Telex: 68411 WVFGLS CLG

TO THE TRADE:

Effective with shipments after this date we announce the prices of our Picture Glass (16 oz.), Single Strength (2.3 mm) and Double Strength (3.0 mm). Clear Sheet Glass as follows:

CLEAR SHEET GLASS
PICTURE GLASS (16 oz)
('B' QUALITY)

CUT SIZES

United Inch Bracket
(Inclusive)

12" to 15"
15.1 to 30
30.1 to 60
60.1 to 70
70.1 to 80

Sq. Ft. Prices
In Pallets

<u>Light</u>	<u>Heavy</u>
\$.307	\$.295
.284	.273
.258	.248
.270	.259
.288	.276

NOTE: Prices for 'A' Quality, add 15% to 'B' Quality Prices.

TOLERANCES:

	<u>Thickness</u>	<u>Size & Squareness</u>
Cut Size	.071"-.084"	+ 1/16"

CLEAR SHEET GLASS
SINGLE STRENGTH (2.3 mm)
('B' QUALITY)

CUT SIZES

United Inch Bracket
(Inclusive)

12" to 15"
15.1 to 30
30.1 to 60
60.1 to 70
70.1 to 80
80.1 to 100
100.1 to 120

Price Per Box
50' 100'

\$17.12	-
14.87	-
14.60	-
15.73	-
17.33	-
-	\$39.86
-	51.10

Sq. Ft. Prices
In Pallets

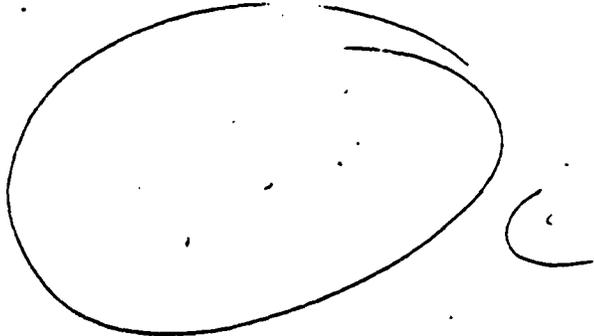
<u>Light</u>	<u>Heavy</u>
\$.311	\$.298
.273	.263
.258	.248
.270	.259
.288	.276
.317	.306
.355	.340



HAPPINESS IS PROSPERITY THROUGH HIGH MOTIVE AND PRODUCTIVITY

West Virginia Flat Glass, Inc.

P.O. BOX 1840, 1628 ADAMS AVE. CLARKSBURG, WV 26301 TEL(304)624-6434
Cable Code: WVFGLS Clarksburg, W.Va. Telex: 68411 WVFLGLS CLG



TO THE TRADE:

As you are aware, ASAHI GLASS CO., LTD., a major flat glass manufacturer in Japan, has purchased controlling interest in Hordis Glass, Inc. and changed the name to WEST VIRGINIA FLAT GLASS, INC.

We are pleased to inform you that the plant has already started reconstruction of the tank using the highly improved ASAHI process and is expected to be completed by early May, 1980 with the plant to be in full production by early June, 1980.

Attached is a new price schedule, effective as of the start of production, which covers the following products:

2.0mm (Picture), 2.3mm (Single)
and 3.0mm (Double) in pallets,
boxes and special stock sizes.

We are now accepting orders for delivery beginning June/July 1980. West Virginia Flat Glass representative's in your local area will be calling on you in the near future.

If you have any questions, please contact our Sales Office to discuss your glass needs.

Sincerely,

Edward E. Dutchess
Vice-President, Sales

EXHIBIT 2



1.00 MM - MICRO GLASS - GLAZING QUALITY
6 - 8 OZ. (.038" - .042")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
Up to 30"	54.95	.515	.494
31" - 50"	52.57	.466	.448

1.2 MM LANTERN GLASS - GLAZING QUALITY
9 - 11 OZ. (.043" - .053")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
12" - 15" U.I. Incl.	56.52	.536	.515
16" - 30"	52.33	.473	.454
31" - 50"	50.82	.450	.432

1.5 MM PHOTO GLASS - GLAZING QUALITY
12 - 14 OZ. (.058" - .068")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u>	<u>PER 100 SQ. FT.</u>	<u>SQ. FT. PRICES IN</u>	
	<u>BOX</u>	<u>BOX</u>	<u>PALLETS</u>	
			<u>2500 Sq. Ft.</u>	<u>5000 Sq. Ft.</u>
12" - 15"	25.96	49.65	.446	.428
16" - 30"	24.04	45.98	.413	.396
31" - 60"	22.33	42.37	.374	.360
61" - 70"	23.58	44.73	.392	.376
71" - 80"	25.36	48.14	.417	.400

2.0 MM PICTURE GLASS - GLAZING QUALITY
15 - 17 OZ. (.070" - .080")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u>	<u>PER 100 SQ. FT.</u>	<u>SQ. FT. PRICES IN</u>	
	<u>BOX</u>	<u>BOX</u>	<u>PALLETS</u>	
			<u>1900 Sq. Ft.</u>	<u>3800 Sq. Ft.</u>
12" - 15"	21.71	41.24	.365	.351
16" - 30"	20.11	38.18	.338	.325
31" - 60"	18.54	35.43	.307	.295
61" - 70"	19.86	37.72	.321	.308
71" - 80"	20.83	39.44	.342	.328

NOTE: MINIMUM SIZE 6 x 6 (excluding 5 x 7) - SIZES WITH ONE DIMENSION UNDER 6" PRICE ON APPLICATION. 12-14 and 15-17 oz. will be packed 24 boxes per skid (50 sq. ft.) & 12 boxes per skid (100 sq. ft.) 12 (50 sq. ft.) boxes per skid - PRICE ON APPLICATION.

For "A" Quality - Add 15% CUTTING TOLERANCE ± 1/32"

For "AA" Quality - Add 11% over "A" Quality Prices.

Fractional Cutting Charges - 1 Fraction: \$.0066 Sq. Ft. } Set up charge same as ss.
2 Fractions: \$.0132 Sq. Ft. }

Fractional Cutting charge waived on orders of 5000' or more of one size, 1 thickness, at one time.

INTERLEAVING: LA 50 Lucor is the standard separator. For paper interleaving add \$.01 per sq. ft. These products can be combined with other JENNYGLAS PRODUCTS to obtain truckload weight.

SET-UP CHARGES: See page 2.

TERMS AND CONDITIONS: Refer to "GENERAL TERMS AND CONDITIONS" dated April 6, 1981.

General Glass

INTERNATIONAL CORP

542 Main Street
New Rochelle, NY 10801
(914) 235-5900



JSG 431 Rev.
April 6, 1981
Page 1

1.00 MM - MICRO GLASS - GLAZING QUALITY
6 - 8 OZ. (.038" - .042")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
Up to 30"	54.95	.515	.494
31" - 50"	52.57	.466	.448

1.2 MM LANTERN GLASS - GLAZING QUALITY
9 - 11 OZ. (.043" - .053")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
12" - 15" U.I. Incl.	56.52	.536	.515
16" - 30"	52.33	.473	.454
31" - 50"	50.82	.450	.432

1.5 MM PHOTO GLASS - GLAZING QUALITY
12 - 14 OZ. (.058" - .068")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u>	<u>PER 100 SQ. FT.</u>	<u>SQ. FT. PRICES IN PALLETS</u>	
	<u>BOX</u>	<u>BOX</u>	<u>2500 Sq. Ft.</u>	<u>5000 Sq. Ft.</u>
12" - 15"	25.96	49.65	.446	.429
16" - 30"	24.04	45.98	.413	.396
31" - 60"	22.33	42.37	.374	.360
61" - 70"	23.58	44.73	.392	.376
71" - 80"	25.36	48.14	.417	.400

2.0 MM PICTURE GLASS - GLAZING QUALITY
15 - 17 OZ. (.070" - .080")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u>	<u>PER 100 SQ. FT.</u>	<u>SQ. FT. PRICES IN PALLETS</u>	
	<u>BOX</u>	<u>BOX</u>	<u>1900 Sq. Ft.</u>	<u>3800 Sq. Ft.</u>
12" - 15"	21.71	41.24	.365	.351
16" - 30"	20.11	38.18	.338	.325
31" - 60"	18.54	35.43	.307	.295
61" - 70"	19.86	37.72	.321	.308
71" - 80"	20.83	39.44	.342	.328

NOTE: MINIMUM SIZE 6x6 (EXC. 5x7) — SIZES WITH ONE DIMENSION UNDER 6" PRICE ON APPLICATION.
12-14 and 15-17 oz. will be packed 24 boxes per skid (50 sq. ft.) & 12 boxes per skid (100 sq. ft.) 12 (50 sq. ft.) boxes per skid — PRICE ON APPLICATION.

For "A" Quality — Add 15% CUTTING TOLERANCE + 1.32"

For "AA" Quality — Add 11% over "A" Quality Prices.

Fractional Cutting Charges - 1 Fraction: \$.0065 Sq. Ft. } Set up charge same as ss
2 Fractions: \$.0132 Sq. Ft. }

Fractional Cutting charge waived on orders of 5000' or more of one size, 1 thickness, at one time.

INTERLEAVING: Paper interleaving is the standard separator for 50' and 100' boxes. LA 50 Lucor is the standard separator for pallets. Paper interleaving is available for pallet packing at an additional charge of \$.01 per sq. ft.

These products can be combined with other JENNYGLASS PRODUCTS to obtain truckload weight.

TERMS AND CONDITIONS: Refer to "GENERAL TERMS AND CONDITIONS" dated April 6, 1981.



10 North Avenue
New Rochelle, NY 10801
(914) 235-5900

JSG 280
October 6, 1980
Page 1

JennyGlas

TO OUR CUSTOMERS:

1.00 MM - MICRO GLASS - GLAZING QUALITY
6 - 8 OZ. (.038" - .042")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN</u>	
		<u>PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
Up to 30"	\$49.95	\$.468	\$.449
31" - 50"	47.79	.424	.407

1.2 MM LANTERN GLASS - GLAZING QUALITY
9 - 11 OZ. (.043" - .053")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN</u>	
		<u>PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
12"- 15" U.I. Incl.	\$51.38	\$.487	\$.468
16"- 30"	47.57	.430	.413
31"- 50"	46.20	.409	.393

1.5 MM PHOTO GLASS - GLAZING QUALITY
12 - 14 OZ. (.058" - .068")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u>	<u>PER 100 SQ. FT.</u>	<u>SQ. FT. PRICES IN</u>	
	<u>BOX</u>	<u>BOX</u>	<u>PALLETS</u>	
			<u>2500 Sq. Ft.</u>	<u>5000 Sq. Ft.</u>
12" - 15"	\$23.60	\$45.14	\$.405	\$.389
16" - 30"	21.85	41.80	.375	.360
31" - 60"	20.30	38.52	.340	.327
61" - 70"	21.44	40.66	.356	.342
71" - 80"	23.05	43.76	.379	.364

2.0 MM PICTURE GLASS - GLAZING QUALITY
15 - 17 OZ. (.070" - .080")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u>	<u>PER 100 SQ. FT.</u>	<u>SQ. FT. PRICES IN</u>	
	<u>BOX</u>	<u>BOX</u>	<u>PALLETS</u>	
			<u>1900 Sq. Ft.</u>	<u>3800 Sq. Ft.</u>
12" - 15"	\$19.74	\$37.49	\$.332	\$.319
16" - 30"	18.28	34.71	.307	.295
31" - 60"	16.85	32.21	.279	.268
61" - 70"	18.05	34.29	.292	.280
71" - 80"	18.94	35.85	.311	.298

NOTE: MINIMUM SIZE 6X6 (EXC. 5X7) - SIZES WITH ONE DIMENSION UNDER 6" PRICE ON APPLICATION.
15-17 OZ. CAN BE PACKED IN 12 AND 24 BOX SKIDS.

For "A" Quality - Add 15% CUTTING TOLERANCE + 1/32"

For "AA" Quality - Add 11% over "A" Quality Prices.

Fractional Cutting Charges - 1 Fraction: \$.0066 Sq. Ft.

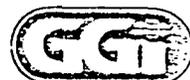
2 Fractions: \$.0132 Sq. Ft.

Fractional Cutting charge waived on orders of 5000' or more of one size, 1 thickness, at one time.

INTERLEAVING: Paper interleaving is the standard separator for 50' and 100' boxes. LA 50 Lucor is the standard separator for pallets. Paper interleaving is available for pallet packing at an additional charge of \$.01 per sq. ft.

These products can be combined with other JENNYGLAS PRODUCTS to obtain truckload weight.

TERMS AND CONDITIONS: Refer to "GENERAL TERMS AND CONDITIONS" dated Aug. 1, 1980.



70 North Avenue
New Rochelle, NY 10801
(914) 235-5900

Jenny Glas

JSG 180 - Rev.
August 1, 1980
Page 1

TO OUR CUSTOMERS:

1.00 MM - MICRO GLASS - GLAZING QUALITY
6 - 8 OZ. (.038" - .042")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN</u> <u>PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
Up to 30"	\$ 46.25	\$.433	\$.416
31" - 50"	44.25	.393	.377

1.2 MM LANTERN GLASS - GLAZING QUALITY
9 - 11 OZ. (.043" - .053")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 100 SQ. FOOT BOXES</u>	<u>SQ. FT. PRICES IN</u> <u>PALLETS</u>	
		<u>3000 Sq. Ft.</u>	<u>6000 Sq. Ft.</u>
12"- 15" U.I. Incl.	\$ 47.57	\$.451	\$.433
16"- 30"	44.05	.398	.382
31"- 50"	42.78	.379	.364

1.5 MM PHOTO GLASS - GLAZING QUALITY
12 - 14 OZ. (.058" - .068")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u> <u>BOX</u>	<u>PER 100 SQ. FT.</u> <u>BOX</u>	<u>SQ. FT. PRICES IN</u> <u>PALLETS</u>	
			<u>2500 Sq. Ft.</u>	<u>5000 Sq. Ft.</u>
12" - 15"	\$ 21.85	\$ 41.80	\$.375	\$.360
16" - 30"	20.23	38.70	.347	.333
31" - 60"	18.80	35.67	.315	.303
61" - 70"	19.85	37.65	.330	.317
71" - 80"	21.34	40.52	.351	.337

2.0 MM PICTURE GLASS - GLAZING QUALITY
15 - 17 OZ. (.070" - .080")

<u>UNITED INCH BRACKETS</u> <u>(INCLUSIVE)</u>	<u>PER 50 SQ. FT.</u> <u>BOX</u>	<u>PER 100 SQ. FT.</u> <u>BOX</u>	<u>SQ. FT. PRICES IN</u> <u>PALLETS</u>	
			<u>1900 Sq. Ft.</u>	<u>3800 Sq. Ft.</u>
12" - 15"	\$ 18.28	\$ 34.71	\$.307	\$.295
16" - 30"	16.93	32.14	.284	.273
31" - 60"	15.60	29.82	.258	.248
61" - 70"	16.71	31.75	.270	.259
71" - 80"	17.54	33.19	.288	.276

NOTE: MINIMUM SIZE 6X6 (EXC. 5X7)-SMALLER SIZES-PRICES ON APPLICATION, 15-17 OZ. CAN BE PACKED IN 12 AND 24 BOX SKIDS.

For "A" Quality - Add 15¢ CUTTING TOLERANCE + 1/32"

For "AA" Quality - Add 11¢ over "A" Quality Prices.

Fractional Cutting Charges - 1 Fraction: \$.0066 Sq. Ft.

2 Fractions: \$.0132 Sq. Ft.

Fractional Cutting charge waived on orders of 5000' or more of one size, 1 thickness, at one time.

INTERLEAVING: Paper interleaving is the standard separator for 50' and 100' boxes. LA 50 Lucor

is the standard separator for pallets. Paper interleaving is available for pallet packing at

an additional charge of \$.01 per sq. ft.

These products can be combined with other JENNYGLAS PRODUCTS to obtain truckload weight.

TERMS AND CONDITIONS: Refer to "GENERAL TERMS AND CONDITIONS" dated Aug. 1, 1980.



270 North Avenue
New Rochelle, NY 10801
(914) 235-5900

ISC 180
November 1, 1979
Page 1

Jeannette Glass

TO OUR CUSTOMERS:

9-11 OZ. (.043" - .053") - GLAZING QUALITY				
UNITED INCH BRACKETS (INCLUSIVE)	PER 100 SQ. FOOT BOXES	PALLETES		
		PER SQ. FOOT.		
		LT.	HVY.	
7" - 15" U.I. Incl.	\$47.57	\$.451	.433	
16" - 30"	44.05	.398	.362	
31" - 50"	42.78	.379	.364	

1.5 MM PHOTO GLASS - GLAZING QUALITY				
12 - 14 OZ. (.058" - .068")				
UNITED INCH BRACKETS (INCLUSIVE)	PER 50 SQ. FT. BOX	PER 100 SQ. FT. BOX.	PALLETES	
			PER SQ. FT.	
			LT.	HVY.
7" - 15"	\$21.85	\$41.80	\$.375	.360
16" - 30"	20.23	38.70	.347	.333
31" - 60"	18.80	35.67	.315	.303
61" - 70"	19.85	37.65	.330	.317
71" - 80"	21.34	40.52	.351	.337

2.0MM PICTURE GLASS - GLAZING QUALITY				
UNITED INCH BRACKET (INCLUSIVE)	15 - 17 OZ. (.070" - .080")		PALLETES	
	PER 50 SQ. FT. BOX	PER 100 SQ. FT. BOX	PER SQ. FT.	
			LT.	HVY.
7" - 15"	\$18.28	\$34.71	\$.307	.295
16" - 30"	16.93	32.14	.284	.273
31" - 60"	15.60	29.82	.258	.248
61" - 70"	16.71	31.75	.270	.259
71" - 80"	17.54	33.19	.288	.276

For Sizes below 3" x 4" or under 3" width - Price on Application.

6 - 8 Oz. (.038 - .042") glass available. Price on Application.

For "A" Quality - Add 15%.

CUTTING TOLERANCE: + 1/32"

For "AA" Quality - Add 11% over "A" Quality Prices.

Fractional Cutting Charges - 1 Fraction: \$.0066 Sq. Ft.

2 Fractions: \$.0132 Sq. Ft.

Fractional Cutting charge waived on orders of 5000' or more of one size, 1 thickness, at one time.

These products can be combined with other JEANNETTE PRODUCTS to obtain truckload weight.

TERMS AND CONDITIONS: Refer to "General Terms and Conditions" dated Nov. 1, 1979.



UNITED STATES
INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436

OFFICIAL BUSINESS

ADDRESS CORRECTION REQUESTED

Postage And Fees Paid
U.S. International Trade Commission

Permit No. G-253



ADDRESS CHANGE

- Remove from List
 - Change as Shown
- Please detach address label and mail to address shown above.