

UNITED STATES TARIFF COMMISSION

FOOTWEAR FOR WOMEN:
SBICCA OF CALIFORNIA, INC.
SOUTH EL MONTE, CALIF.

Report to the President
on Investigation No. TEA-F-60
Under Section 301(c)(1) of the Trade Expansion Act of 1962



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UNITED STATES TARIFF COMMISSION

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REPORT TO THE PRESIDENT

U.S. Tariff Commission,
April 5, 1974.

To the President:

In accordance with sections 301(f)(1) and (f)(3) of the Trade Expansion Act of 1962 (TEA) (76 Stat. 872; 19 U.S.C. 1801), the U.S. Tariff Commission herein reports the results of investigation No. TEA-F-60 made under section 301(c)(1) of the act to determine whether, as a result in major part of concessions granted under trade agreements, articles like or directly competitive with footwear for women (of the types provided for in item 700.45 of the Tariff Schedules of the United States (TSUS)) produced by Sbicca of California, Inc., South El Monte, Calif., are being imported into the United States in such increased quantities as to cause, or threaten to cause, serious injury to such firm.

The investigation was instituted on February 7, 1974, on the basis of a petition for adjustment assistance filed under section 301(a)(2) of the act on behalf of the firm.

Notice of the investigation was published in the Federal Register (39 F.R. 5821) on February 15, 1974. No public hearing was requested, and none was held.

The information in this report was obtained from the president of Sbicca of California, Inc., and his accountant, customers of the firm, official Government statistics, and the Commission's files.

Finding of the Commission

On the basis of its investigation, the Commission, being equally divided, 1/ makes no finding under section 301(c)(1) of the Trade Expansion Act of 1962 with respect to whether articles like or directly competitive with footwear for women (of the types provided for in item 700.45 of the Tariff Schedules of the United States) produced by Sbicca of California, Inc., South El Monte, Calif., are, as a result in major part of concessions granted under trade agreements, being imported into the United States in such increased quantities as to cause, or threaten to cause, serious injury to such firm.

1/ Chairman Bedell and Commissioner Moore found in the affirmative. Commissioners Young and Ablondi found in the negative. Vice Chairman Parker and Commissioner Leonard did not participate in the decision.

Views of Chairman Bedell and Commissioner Moore in Support
of an Affirmative Determination

This investigation relates to a petition filed on behalf of Sbicca of California, Inc., South El Monte, Calif., under section 301(a)(2) of the Trade Expansion Act of 1962 (TEA) for a determination of such firm's eligibility to apply for adjustment assistance. Sbicca of California, which has been in operation since 1943, produces a wide range of women's dress and casual foot-wear--with emphasis on fashionable casual shoes--of cement construction retailing between \$20 and \$26 a pair.

As we have stated in previous cases, the Commission, in order to make an affirmative determination under section 301(c)(1) of the TEA must find that the following four criteria are met:

- (1) Articles like or directly competitive with those produced by the firm are being imported in increased quantities;
- (2) The increased imports are a result in major part of concessions granted under trade agreements;
- (3) The firm is being seriously injured, or threatened with serious injury; and
- (4) The increased imports resulting from trade-agreement concessions are the major factor in causing or threatening to cause the serious injury to the firm.

We find that each of these requirements has been met in the instant case; therefore, we have made an affirmative determination.

Increased imports a result in major part of trade-agreement concessions

U.S. imports of women's dress and casual footwear, which are like or directly competitive with those produced by Sbicca of California, Inc. have increased sharply in recent years. Foreign producers shipped nearly 212 million pairs of nonrubber footwear into the United States in 1973 compared with 139 million pairs in 1969. Imports of women's dress and casual footwear supplied about a half of apparent U.S. consumption of such footwear in 1973 but only about a third in 1969. The growth in imports was also pronounced for women's dress shoes. U.S. imports of women's dress shoes totaled an estimated 53 million pairs in 1973 contrasted with an estimated 28 million pairs in 1969. The share of apparent annual U.S. consumption of women's dress shoes supplied by imports was an estimated 29 percent in 1973 compared with 14 percent in 1969. Imports of women's casual shoes also showed a marked increase. Such imports grew from an estimated 111 million pairs in 1969 to an estimated 159 million pairs in 1973. The share of apparent annual U.S. consumption of women's casual shoes supplied by imports increased from over 50 percent in 1969 to nearly 75 percent in 1973.

This recent substantial growth of imports which started in 1968 coincides with the implementation of the trade-agreement concessions granted in the Kennedy Round. Rates of duty on women's dress and casual shoes like or directly competitive with those produced by Sbicca of California were reduced by 50 percent below the 1967 rate as a result of the Kennedy Round concessions, but the reduced rate of duty on the bulk of increased imports of women's dress and casual footwear is nearly 85 percent below the 1930 rate.

We have determined that the increased imports of women's dress and casual footwear cited above have resulted in major part from trade-agreement concessions within the meaning of the statute.

The firm is being seriously injured or threatened with serious injury

Evidence developed in this case conclusively demonstrates that Sbicca of California is experiencing serious injury and is threatened with serious injury. The financial condition of Sbicca of California has deteriorated in recent years. Net sales of the firm declined from * * * million in 1971 to * * * million in 1973 (an amount less than that sold in 1969)--or by *** percent. In addition, the company sustained net losses of approximately * * * in 1972 and * * * in 1973. The ratios of net profit or loss to total assets and to stockholders' equity declined rapidly during the same period, and retained earnings of the company reflected a deficit balance at the close of 1973. The working capital of the firm has suffered a substantial decline.

Employment at the Sbicca plant has also suffered a marked decline. In terms of production and related workers on the average, the firm employed about *** percent fewer workers in 1973 than in the 3 preceding years. In 1973, the firm utilized only * * * of the average productive capacity that had been utilized in 1969-72. As a result of such idling of productive facilities and loss of economies of scale, unit costs increased--further reducing the profitability of the firm.

In view of the foregoing, in our opinion, the firm is experiencing serious injury.

Imports are the major factor causing or threatening to cause serious injury to the firm

The evidence in this case shows that prior to the influx of concession-generated imports in recent years sales of Sbicca of California were maintained at a profitable level. Subsequently, Sbicca of California experienced a decline in production and sales of its women's footwear as lower priced imports captured a substantial share of the company's market. Through prudent management Sbicca made every effort to compete against price competition from imports. Despite substantial increases in leather prices, the firm's costs per pair of shoes remained stable. In addition, the firm utilized the newest production machinery to increase efficiency. The company produced quality footwear and offered the latest styles in response to the most recent fashions.

Buyers for a substantial portion of Sbicca's present and former principal customers stated that although the company provided top quality extremely fashionable women's footwear, as well as good service, these customers were forced to turn, wholly or in part, to purchases of imported footwear because of a small price advantage.

Despite efforts cited above to improve efficiency and to reduce costs, this loss of sales to concession-generated imported footwear resulted in steadily growing losses and was the major factor causing the serious financial impairment of the firm's operations.

Conclusion

In the light of the above facts, we conclude that increased imports resulting in major part from trade-agreement concessions are the major factor causing serious injury to Sbicca of California, Inc., and therefore we have made an affirmative decision.

Views of Commissioner Young 1/

My determination in the instant case is negative because one of the statutory criteria has not been met, i.e., that the increase in imports of footwear like or directly competitive with that produced by Sbicca of California, Inc., South El Monte, Calif., is the result in major part of concession granted under trade agreements. My reasoning in support of this determination is set forth in a statement of my views in an earlier Commission investigation under the Trade Expansion Act. 2/

1/ Commissioner Ablondi concurs in the result.

2/ Women's Dress and Casual Shoes: Duchess-Footwear Corp. . . .:
Report to the President on Firm Investigation No. TEA-F-39 and
Worker Investigation No. TEA-W-139. . . , TC Publication 491, 1972,
pp. 11-25.

INFORMATION OBTAINED IN THE INVESTIGATION

Description of Articles Under Investigation

Sbicca of California, Inc., of South El Monte, Calif., operates one establishment which presently produces women's dress and casual shoes--with emphasis on fashionable casual shoes--as its principal product; such shoes have uppers of leather and are made in a wide variety of up-to-date styles with various types and heights of heels. Most of Sbicca's shoes are constructed by the cement process, although a small part of the output is of nail-on construction. Such footwear is sold at retail in the range of \$20 to \$26 a pair.

The principal features of women's shoes that determine the occasion or activity for which a particular pair is suitable--and thus the trade designations such as "dress," "casual," and "slippers"--are the cut of the uppers, the style and height of the heels, the material used for the uppers, the kind of ornamentation, and the material and construction of the sole. In general or commercial usage, however, these descriptive terms for footwear may have various meanings. Some of them are specifically defined for tariff purposes in the headnotes (including the statistical headnotes) to part 1, subpart A of schedule 7 of the Tariff Schedules of the United States Annotated (TSUSA).

As a share of U.S. retail sales, so-called dress shoes (a term not defined in the TSUSA) are more important than any other type of footwear for women. The term "dress shoes," originally limited only to shoes worn on formal occasions, is now used to describe footwear of

the types generally worn for street wear and for business and social activities. Depending upon fashion designs, dress shoes may be open- or closed-heel shoes with straps, laces, or tongues over the instep and may include high-heeled sandals with open toes, open heels, and uppers of narrow strips of leather or other materials. Women's shoes intended for formal wear, which are also regarded as dress shoes, are sometimes referred to as evening shoes, slippers, or sandals. The term "dress shoes" does not include footwear especially made for athletic, occupational, and leisure activities.

The materials used for the uppers of dress shoes are usually finer (i.e., less sturdy) than those used for the uppers of other types of footwear. Uppers may be of calf, kid, or reptile leathers; of silk, rayon, linen, satin, brocade, velvet, or metallic fabrics; or of supported vinyls or other plastics.

Women's footwear for casual wear, not considered dress shoes, includes certain sandals, wedge-heeled shoes, flats, clogs, loafers, desert boots, moccasins, and sneakers. Casual shoes usually have a lower heel than dress shoes and are generally constructed to withstand harder wear.

The range of styles and the quality of footwear increased greatly during the 1960's as a result of new materials, technological developments in production, and new fashions in wearing apparel; and this trend has continued into the 1970's. Simultaneously, consumers demanded footwear designed for specific purposes. Women today wear dress and casual shoes suitable to their lifestyles.

For many years the principal type of dress shoe worn by women in the United States was the classic pump--a closed-toe, closed-back, slip-on shoe without fasteners, with lightweight soles, and with heels of 2 inches or higher. With the advent of new fashions in wearing apparel, the pump declined in popularity in the late 1960's. In 1967 the chunky style (monster) shoe appeared, marking the beginning of a style revolution in women's footwear. With footwear becoming an important accessory to fashion, footwear styles changed rapidly. A great variety of designs were introduced, creating an ever wider choice for the footwear consumer.

In the late 1960's, formfitting calf-length boots became fashionable, along with the miniskirt and other new dress styles, and continued to be popular throughout 1970 and 1971. The popularity of boots during this period undoubtedly had an adverse effect on the demand for other types of women's footwear. However, with the switch by women to other types of wearing apparel--such as pants suits--which did not complement boot designs, the market for calf-length boots diminished markedly in 1972. In 1973, ankle-high boots for casual wear and higher length boots with more functional designs replaced the formfitting or stretch calf-length fashion boots.

Changing fashions in women's apparel have continued to affect footwear since the early 1970's. As changes occurred in dress lengths and as trousers became increasingly acceptable as appropriate women's wear for almost every occasion, footwear styles with 1-inch soles and even higher platforms became popular. A variety of materials--plantation crepe, "marshmallow" (pliable synthetic), leather combinations, and various plastics--were used to make soles, concealed platforms, and wedges. Some bottom

assemblies were even colored, painted, or sculptured. During 1970-72 such platform styles dominated most women's footwear. In 1973, however, as women's fashions returned to the more classic or traditional styling, the classic pump design for footwear again became popular, a trend which has continued into 1974. Platforms are becoming less extreme, and footwear more feminine in style is now being offered. Examples of the new look include lighter, sandalized (open) footwear with emphasis on bows, straps, slimmer high heels, and narrower toe shapes in both dress and casual footwear. There has also been a return to the low-heeled flat for casual wear.

As indicated previously, most of the footwear produced by Sbicca of California, Inc. consists of casual and dress shoes with uppers of leather--mostly made by the cement process. In this method of construction, which accounts for about 80 percent of the total U.S. output of all women's footwear, the outsole (or midsole, if any) is affixed to the upper by an adhesive without sewing.

It is estimated that about 60 percent of the nonrubber women's shoes produced in 1973 had leather uppers, compared with nearly 70 percent in 1970. The American Footwear Industries Association (AFIA) indicates that owing to the recent shortage of hides and the consequent increases in prices of leather, prices of women's leather footwear have risen steadily. The president of the AFIA has further indicated that, as the price of leather footwear increased, shoes made from sophisticated manmade materials--polyurethane, polymerics, and nylon velvets--gained a larger percentage of the U.S. market. Footwear of manmade materials lends itself

not only to the multihued new platform styles favored by young people but also to the more conservative styles. The following AFIA data illustrate the changes in the shares of the nonrubber footwear market supplied by leather and by manmade materials.

Percentages of total U.S. output of nonrubber footwear accounted for by leather and by manmade materials, specified years 1950 to 1975

Year	:	Leather	:	Manmade materials
	:		:	
1950-----:		85 :		15
1960-----:		76 :		24
1972-----:		60 :		40
1973-----:		54 :		46
1975 <u>1/</u> -----:		50 :		50
	:		:	

1/ Estimated projection.

Source: Compiled from data supplied by the American Footwear Industry Association.

Industry sources, however, report that owing to recent and possibly worsening shortages of petrochemically derived materials, a reversal is possible in the relationship between the proportion of leather and of manmade materials used in the production of footwear.

U.S. Tariff Treatment

Applicable TSUS items

The great bulk of women's imported dress and casual shoes are entered under TSUS items 700.20, 700.43, 700.45, and 700.55. As explained briefly in the following paragraphs, the footwear classifiable under these four TSUS items varies with respect to materials, method of construction, price line, and/or style.

Imports entered under TSUS items 700.43 and 700.45--which provide for leather footwear having a foreign (export) value of not over \$2.50 a pair and over \$2.50 a pair, respectively--consist predominantly of women's footwear in a wide range of styles, types, and prices. In terms of quantity, a substantial part of the combined imports under these two items in recent years have consisted of women's sandals both for casual and for dress wear. The remainder have probably consisted predominantly of women's moderate-priced cement-process dress and casual shoes (i.e., in the retail-price range of \$8 to \$20 a pair). Women's imported leather footwear made by the turn process and dutiable under TSUS item 700.20 does not differ significantly in appearance from the leather dress shoes entered under items 700.43 and 700.45; however, the imports of turned footwear under item 700.20 have been small.

Women's imported footwear with supported-vinyl uppers, dutiable under TSUS item 700.55, has in recent years consisted predominantly of two groups: (1) Street shoes of sturdy construction, produced in a single width for each particular length, for sale at self-service counters

in variety stores, discount stores, and department-store basements and (2) folding slippers, sandals, and other inexpensive footwear. It is believed that before 1970 only a negligible portion of the annual imports of women's dress shoes and boots admitted under item 700.55 retailed at more than \$10 a pair; in the period 1971 through 1973, the annual imports of such footwear retailing at more than \$10 a pair (mostly just over that price) probably accounted for less than 10 percent of the total imports.

Rates of duty

In the Tariff Act of 1930, women's leather footwear of cement-process construction was originally dutiable under paragraph 1530(e) at 20 percent ad valorem. Such footwear is provided for in the TSUS, which became effective on August 31, 1963, under items 700.43 and 700.45. The rate of duty was reduced for the first time effective January 1, 1968, pursuant to concessions granted during the Kennedy Round of negotiations. The current rate for item 700.43 is 15 percent, and that for item 700.45 is 10 percent.

Prior to the Kennedy Round, the rate of duty on leather turn or turned footwear (now provided for under TSUS item 700.20) was first reduced on January 1, 1932, from 20 percent ad valorem to 10 percent, pursuant to section 336 of the Tariff Act of 1930. The 10-percent rate, which was bound against increase in a concession granted to Switzerland, effective February 15, 1936, was reduced to 5 percent pursuant to a concession, effective May 30, 1950, granted under the General Agreement on Tariffs and Trade (GATT). The current rate for item 700.20 is 2.5 percent.

Supported vinyl was not used for uppers until the late 1940's or early 1950's. Prior to the effective date of the TSUS, imports of women's supported-vinyl-upper footwear, which were dutiable under various provisions of the Tariff Act, were classified principally--

- (1) By similitude, at the rate of 20 percent ad valorem applicable to leather footwear provided for in paragraph 1530(e). 1/
- (2) Under paragraph 1537(b) as articles in chief value of rubber, at the trade-agreement rate of 12.5 percent ad valorem, where the soles were of india rubber and constituted the chief value of the footwear in question.
- (3) Under paragraph 1539(b) at the reduced rate of 21 cents per pound plus 17 percent ad valorem where the footwear was in chief value of a product having a synthetic resin as the chief binding agent.

In the TSUS, a rate of 12.5 percent ad valorem was established for item 700.55 as the trade-agreement rate to replace the wide range of rates previously applicable to the various types of footwear provided for in this item. 2/ The current rate on footwear with supported-vinyl uppers is 6 percent ad valorem.

Table 1 in the appendix shows the reductions in rates of duty resulting from trade-agreement concessions granted under the GATT for footwear of the types now dutiable under items 700.20, 700.43, 700.45, and 700.55. Tables 2 through 5 show U.S. imports of women's shoes admitted under the TSUS items mentioned above and the applicable rates of duty.

1/ The principal kinds of footwear with supported-vinyl uppers now being imported (i.e., those with soles of vinyl or other plastics) would have been dutiable by virtue of the similitude provision under par. 1530(e) at a rate of 20 percent ad valorem.

2/ The column 2 rate of duty for item 700.55 is 35 percent.

U.S. Consumption, Production, and Imports

During the period 1965-73, apparent annual U.S. consumption of all women's nonrubber footwear rose from an estimated 386 million pairs in 1965 to a peak of 455 million pairs in 1968 and then declined to 402 million pairs in 1973. Annual U.S. production of such footwear declined from 319 million pairs in 1965 to 190 million pairs in 1973. Annual imports tripled during this period, and their share of the market increased without interruption from 17 percent to 53 percent, as shown on page A-10. Italy and Spain have been the principal suppliers of women's dress and casual leather footwear; the Republic of China (Taiwan) and Japan, the principal suppliers of such footwear made with vinyl uppers.

Data on U.S. consumption of women's dress shoes are not separately reported in official statistics. It is estimated, however, that during 1965-73 apparent annual U.S. consumption (production plus imports) of such footwear moved irregularly, rising from about 204 million pairs in 1965 to about 231 million in 1968 but declining to 180 million in 1973.

Estimated domestic production of women's dress shoes during this period reached a peak of about 210 million pairs in 1968 and then declined to 127 million pairs in 1973. Estimated imports rose from 4 million pairs in 1965 to 53 million pairs in 1973. The share of apparent annual U.S. consumption of women's dress shoes supplied by imports increased from 2 percent in 1965 to 29 percent in 1973, as shown on page A-11.

Nonrubber footwear for women: U.S. production, imports for consumption, and apparent consumption, 1965-73

Year	Production	Imports	Apparent	Ratio of
	<u>1/</u> Million pairs	<u>2/</u> Million pairs	<u>consump-</u> <u>tion 3/</u> Million pairs	imports to consumption Percent
1965-----:	319	67	386	17
1966-----:	323	70	393	18
1967-----:	290	96	386	25
1968-----:	322	133	455	29
1969-----:	271	139	410	34
1970-----:	260	165	425	39
1971-----:	237	180	417	43
1972-----:	223	198	421	47
1973-----:	190	212	402	53
-----:	-----:	-----:	-----:	-----:

1/ Production represents the output of women's and misses' footwear as reported by the U.S. Bureau of the Census, plus shipments to the U.S. mainland from Puerto Rico.

2/ Partly estimated from the official statistics for footwear of the kinds described in pt. 1 subpart A of schedule 7 of the TSUSA except imports described in items 700.32, 700.51, 700.52, 700.53, and 700.60 and except zoris (very inexpensive thonged sandals of rubber or plastics), dutiable under item 700.55. Includes imports of misses' footwear, which have been negligible compared with those of women's.

3/ Computed from U.S. production plus imports without an allowance for exports, which in 1973 amounted to about 1 million pairs.

Source: Compiled from official statistics of the U.S. Department of Commerce, except as noted.

Dress shoes for women: U.S. production, imports for consumption,
and apparent consumption, 1965-73

Year	Production 1/	Imports 2/	Apparent consumption 3/	Ratio of imports to consumption
	Million pairs	Million pairs	Million pairs	Percent
1965-----:	200 :	4 :	204 :	2
1966-----:	206 :	7 :	213 :	3
1967-----:	188 :	11 :	199 :	6
1968-----:	210 :	21 :	231 :	9
1969-----:	177 :	28 :	205 :	14
1970-----:	165 :	36 :	201 :	18
1971-----:	156 :	43 :	199 :	22
1972-----:	150 :	50 :	200 :	25
1973-----:	127 :	53 :	180 :	29
	:	:	:	

1/ Dress shoes are believed to account for about 2/3 of the total annual output of nonrubber footwear for women and misses.

2/ Dress shoes are estimated to have accounted for about 1/4 of the total annual imports of women's and misses' footwear in recent years.

3/ Data represent estimated production plus estimated imports without an allowance for exports, which in 1973 accounted for less than 1 million pairs.

Source: Estimated by the U.S. Tariff Commission, based on official statistics of the U.S. Department of Commerce.

Estimates of U.S. consumption, production, and imports of women's casual footwear are shown in the following table. The table indicates that during the last 9-year period, while domestic production was on a downward trend and imports more than doubled, apparent consumption fluctuated from 180 million pairs in 1966 to 224 million pairs in both 1968 and 1970 and was 222 million in 1973. It is estimated that the import share of domestic consumption increased from 35 percent in 1965 to 72 percent in 1973.

Women's casual footwear: Estimated production, imports for consumption, and apparent consumption, 1965-73

Year	Production <u>1/</u>	Imports <u>2/</u>	Apparent consumption <u>3/</u>	Ratio of imports to apparent consumption
	Million pairs	Million pairs	Million pairs	Percent
1965-----:	119 :	63 :	182 :	35
1966-----:	117 :	63 :	180 :	35
1967-----:	102 :	85 :	187 :	45
1968-----:	112 :	112 :	224 :	50
1969-----:	94 :	111 :	205 :	54
1970-----:	95 :	129 :	224 :	58
1971-----:	81 :	137 :	218 :	63
1972-----:	73 :	148 :	221 :	67
1973-----:	63 :	159 :	222 :	72

1/ Casual shoes are believed to account for about 1/3 of the total annual output of nonrubber footwear for women and misses.

2/ Casual shoes are estimated to have accounted for about 3/4 of the total annual imports of women's and misses' footwear in recent years.

3/ Data represent estimated production plus estimated imports without an allowance for exports, which in 1973 amounted to less than 1 million pairs.

Source: Estimated by the U.S. Tariff Commission from official statistics of the U.S. Department of Commerce.

Prices

As indicated earlier in this report, the women's shoes produced by Sbicca of California, Inc. retailed in the range of \$20 to \$26 a pair. As shown in the table below, about 13 percent of domestic production of women's nonrubber footwear in 1972 was sold at estimated retail selling price at \$20 to \$28 a pair.

Women's nonrubber footwear: Percentage distribution of domestic production, by manufacturer's selling price, 1972 and 1968

Estimated retail selling price	1972	1968
\$2.00 or less-----:	-	
\$2.01 to \$4.00-----:	0.9	
\$4.01 to \$6.00-----:	5.6	
\$6.01 to \$8.00-----:	19.9	
\$8.01 to \$10.00-----:	16.1	
\$10.01 to \$12.00-----:	11.0	
\$12.01 to \$14.00-----:	4.5	
\$14.01 to \$16.00-----:	7.4	
\$16.01 to \$18.00-----:	6.6	
\$18.01 to \$20.00-----:	13.3	
\$20.01 to \$24.00-----:	11.0	19.2
\$24.01 to \$28.00-----:	2.0	
\$28.01 to \$32.00-----:	1.2	
\$32.01 to \$36.00-----:	.3	
\$36.01 to \$40.00-----:	.1	48.7
\$40.01 or more-----:	.1	29.3
Total-----:	100.0	100.0

Source: U.S. Bureau of the Census, Footwear Production by Manufacturer's Selling Price, 1972.

Data with respect to the estimated retail price of the imported footwear are shown in the table below.

Women's nonrubber footwear: Percentage distribution of imported footwear, by estimated retail selling price, 1972

Estimated retail selling price	:	Percent of total
\$3.00 or less-----	:	33
\$3.01 to \$6.00-----	:	23
\$6.01 to \$10.00-----	:	13
\$10.01 to \$16.00-----	:	18
\$16.01 to \$22.00-----	:	8
\$22.01 to \$28.00-----	:	3
\$28.01 or more-----	:	2
Total-----	:	100

Source: Estimated by the U.S. Tariff Commission on the basis of imports entered under items 700.4310, 700.4340, 700.4540, and 700.5545 in 1972. Such imports accounted for about 82 percent of the total imports of footwear for women and misses in that year.

U.S. and Foreign Wage Rates

The table on the following page shows the average hourly earnings and the estimated compensation per hour received by shoe workers in eight countries in 1970, 1971, and 1972. While of some use in comparing the labor costs of the shoe industries in the various countries listed, the table has several shortcomings that make such comparisons inexact. First, in only the United States, Italy, and Hong Kong is the industry definition limited exclusively to footwear. In the other countries the industry classifications are more encompassing. Second, as footnote 1 to the table indicates, published hourly earnings in the various countries differ in composition. Third, total compensation for workers includes varying factors in the eight countries.

Hourly earnings of production workers and estimated total compensation per hour worked
in specified industries related to footwear in 8 countries, 1970, 1971, and 1972

(In U.S. dollars)

Country	Industry	Published average hourly earnings 1/			Estimated compensation per hour worked 2/		
		1970	1971	1972	1970	1971	1972
		:	:	:	:	:	:
Brazil-----	Clothing and footwear-----	3/ \$0.28	4/	4/	4/	4/	4/
Hong Kong-----	Rubber footwear-----	5/ .30	\$0.35	\$0.41	5/ \$0.32	5/ \$0.37	\$0.44
Italy-----	Footwear 6/-----	.60	.80	.93	1.09	1.42	1.62
Japan-----	Rubber products, including plastic						
	: footwear 7/-----	.88	1.08	1.49	1.00	1.23	1.69
Korea-----	Rubber and plastic products 7/ 8/-----	.18	.18	.18	.22	.22	.22
Spain-----	Clothing and footwear 8/-----	.38	.43	.53	.55	.62	.76
Taiwan-----	Rubber and plastic products 7/-----	4/	4/ : 10/	.19	4/	4/ : 10/	.23
United States-----	Footwear, excluding rubber-----	2.43	2.53	2.63	2.95	3.09	3.24
	: Rubber footwear-----	2.70	2.78	2.88	3.48	3.61	3.77
		:	:	:	:	:	:

1/ Published earnings do not represent the same items of labor compensation in each country because of differences in the treatment of various supplementary benefits. Earnings generally refer to gross cash payments to wage workers before deductions for taxes and social security, and include overtime pay, shift differentials, regular bonuses and premiums, and cost-of-living adjustments. Holiday, vacation, and sick leave pay, bonuses not paid regularly each pay period, and other supplementary benefits are included by some countries and excluded by others. The earnings data are per paid hour for some countries and per hour worked for other countries.

2/ Compensation refers to all payments made by employers directly to their workers before deductions of any kind, plus employer contributions to legally required insurance programs and private welfare plans for the benefit of employees. The figures on additional compensation per hour worked as a percentage of published earnings are the best estimates currently available to the Bureau of Labor Statistics. The estimates are based primarily on labor costs or labor compensation surveys adjusted to the listed years on the basis of other available data.

3/ Average for 1969; monthly earnings of 211.60 cruzeiros converted to an hourly basis by assuming 195 hours of work per month.

4/ Not available.

5/ Daily earnings converted to an hourly basis by assuming 9 hours of work per day. The compensation figures include pay for time not worked, bonuses, and the value of pay in kind, but not overtime pay or employer contributions to social insurance funds.

6/ Approximately 15 percent of the workers in the Italian shoe industry are home workers who are paid at a lower wage rate than the factory workers in the industry.

7/ The shoes shipped from Hong Kong, Japan, Korea and Taiwan to the United States are principally of plastics. Separate data are not available on the plastics footwear industry, except for Hong Kong. Approximately half of the workers in the Japanese plastics shoe industry are home workers who are paid at a lower rate than the factory workers in that industry.

8/ Including salaried employees.

9/ The compensation factor included in this figure is employer social security payments, which range from 40 to 50 percent of payroll.

10/ July - December 1972. The published earnings data are computed per hour worked and include overtime pay, regular premiums, and bonuses; family allowances; the market value of payments in kind; and wages paid to persons absent from work. Compensation figures also include annual bonuses and employer contributions to national insurance.

Source: Based on data provided by U.S. Bureau of Labor Statistics, from the following: Brazil--Yearbook of Labour Statistics 1973, International Labour Office, Geneva; Hong Kong--Annual Departmental Report, 1970-73, Commissioner of Labour, Hong Kong; Italy--Rassegna di Statistiche del Lavoro, various issues, Confederazione General dell'Industria Italiana, Rome; Japan--Year Book of Labour Statistics, various issues, Ministry of Labour, Tokoyo; Korea--Monthly Statistics of Korea, various issues, Economic Planning Board, Seoul; Spain--Year Book of Labour Statistics 1973, International Labour Office, Geneva; and Taiwan--Monthly Bulletin of Labor Statistics, November 1973, Directorate-General of Budget, Accounting, and Statistics, Taipei. Conversion from the currencies of the foreign countries in the table to U.S. dollars was made on the basis of average daily exchange rates for the year as reported by the Federal Reserve Bulletin.

Data Relating to Sbicca of California, Inc.

Corporate structure, plant, and equipment

Sbicca of California, Inc., South El Monte, Calif., which currently operates one plant, derives from a women's footwear company founded by Frank Sbicca, Sr., in Philadelphia, Pa., in 1920. That company was incorporated under the name of Sbicca, Inc., as a Delaware corporation in 1931. Mr. Sbicca purchased Collins of California in 1943 and incorporated it and changed its name to Sbicca of California, Inc., in that same year. Sbicca, Inc., the Philadelphia plant, was sold in 1948. Arthur Sbicca is president of Sbicca of California, Inc., and Peter Sbicca, his brother, is secretary-treasurer.

Stock ownership in the firm is roughly divided equally among the three sons of Frank Sbicca, Sr.,--Arthur, Peter, and Frank, Jr. Frank Sbicca, Jr., was formerly an officer of the firm but left active management in October 1971 * * *

He presently operates his own shoe firm, Shoes N' Stuff, which is engaged exclusively in importing. Arthur and Peter have a law suit pending against their brother Frank enjoining him not to use his name in any way which would imply use of it as a brand name.

The plant of Sbicca of California, which has one floor, was constructed in 1956 with 50,000 square feet of floor space. It was expanded in 1970 and now totals 62,500 square feet. A company official stated that the plant utilizes the most modern equipment available, most of it being about 5 to 6 years old. Certain equipment for making heels, clogs, and unit bottoms was purchased during 1971-72 in order to

make the firm more competitive. Two injection-molding machines, one for making heels and the other for making clogs, came from Italy and cost * * * respectively, not including mold costs. The polyurethane molding machine for making unit bottoms was imported from Germany at a cost of * * *. It is not presently being operated. The plant utilizes four modern conveyor-belt systems to speed the flow of materials in the stitching room. In addition, several programmed conveyors insure that cut materials are readily available at proper assembly points in the flow of footwear through the assembly line. New heel and unit-bottom machines are strategically located to facilitate the attachment of such components to the footwear. The company has machinery for making its own steel cutting dies and some of its lasts. It does all its own pattern grading. More than 90 percent of the machinery is owned. Some lasting equipment is leased.

Sbicca operates a retail outlet--A. J. Ross Continental Shoes & Boots, Inc., Los Angeles, Calif., a wholly owned subsidiary--which it purchased in August 1973 to market some of its own footwear. However this outlet also sells some other domestic women's footwear and a negligible amount of imported women's footwear to complement its product line.

The Sbicca family owns two other enterprises not contained in the Sbicca corporate structure. Upon his death in 1953, Mr. Frank Sbicca, Sr., left a life estate, Ernesta-Sbicca Trustee, to his wife Ernesta Sbicca. That trust owns the land and building occupied by Sbicca of California and rents it to the firm. Mr. Arthur Sbicca stated that this represents an arms-length relationship since independent appraisers make the appraisals, and only Mrs. Sbicca receives the rent. Upon Mrs. Sbicca's death, the property will become the property of the five Sbicca children.

The Sbicca family also operates a family partnership, Sbicca Enterprises. As discussed in more detail in the profit-and-loss section of this report, this partnership owns and rents to Sbicca of California property immediately surrounding the firm's plant. The partnership consists of Mrs. Ernesta Sbicca and her five children. Sbicca Enterprises also deals in various other real estate unrelated to the family footwear business.

Product and prices

Sbicca currently produces women's dress and casual footwear, mostly of cement-process construction, with some clog styles of nail-on construction. The emphasis in recent years has been on fashionable casual footwear of various heel and sole heights, including clogs, dressy-casual sandals, casuals, tailored, monster, and dress shoes. The footwear uppers are made almost exclusively of leather; and the heels and soles are made of a variety of materials, including various manmade materials, crepe, wood, and cork. The shoes produced by Sbicca retail from \$20 to \$26 a pair. Such footwear is designed for women from about 16 years of age to 30, although women up to 40 may buy them. Company officials refer to their footwear as "young fashion" as opposed to "high fashion."

Sbicca also produced women's fashion boots in response to the fashion demand for such boots, especially from 1970 to 1972. Most of these boots had leather uppers, although a few had urethane uppers (the so-called stretch-boot style). Heels and soles included all types used on shoes. The boots retailed for \$14 to \$25 a pair.

A. J. Ross Continental Shoes & Boots, Inc., distributes the Sbicca line of women's dress and casual shoes; it also handles some more extreme styles of women's dress and casual shoes of other domestic producers and a very few imports of clog and platform shoes to complement its product line. The footwear from other domestic producers retails for the same price as Sbicca's. The imported footwear retails for \$20 to \$30 a pair.

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Data Relating to Sbicca of California, Inc.:

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APPENDIX A
STATISTICAL TABLES

Table 1.--U.S. rates of duty applicable to women's and misses' footwear of the types provided for in specified TSUS items, July 1, 1934, and GATT concessions to Jan. 1, 1972

TSUS item No.	Abbreviated description	Rate of duty		
		July 1, 1934	GATT concession 2/ Rate	Effective date
		Percent ad val.	Percent ad val.	
	Leather footwear:			
700.20	Turn or turned-----	10 3/	5 4 3 2.5	May 30, 1950-Dec. 31, 1967. Jan. 1, 1968-Dec. 31, 1969. Jan. 1, 1970-Dec. 31, 1971. Jan. 1, 1972.
700.43	"Other" (including cement process): Valued not over \$2.50 per pair----	20	19 18 17 16 15	Jan. 1-Dec. 31, 1968. Jan. 1-Dec. 31, 1969. Jan. 1-Dec. 31, 1970. Jan. 1-Dec. 31, 1971. Jan. 1, 1972.
700.45	Valued over \$2.50 per pair-----	20	18 16 14 12 10	Jan. 1-Dec. 31, 1968. Jan. 1-Dec. 31, 1969. Jan. 1-Dec. 31, 1970. Jan. 1-Dec. 31, 1971. Jan. 1, 1972.
700.55	Footwear having uppers of supported vinyl.	Princi- pally 20 4/	5/ 12.5 11 10 8.5 7 6	Aug. 31, 1963-Dec. 31, 1967. Jan. 1-Dec. 31, 1968. Jan. 1-Dec. 31, 1969. Jan. 1-Dec. 31, 1970. Jan. 1-Dec. 31, 1971. Jan. 1, 1972.

1/ Except as noted, the rate on July 1, 1934, was the same as the original rate in the Tariff Act of 1930, effective June 18, 1930.

2/ For concessions granted in the Kennedy Round, effective Jan. 1, 1968, the table shows staged rates scheduled to become effective up to and including Jan. 1, 1972.

3/ Effective Jan. 1, 1932, the statutory rate of 20 percent ad valorem was reduced to 10 percent ad valorem, pursuant to sec. 336 of the Tariff Act of 1930.

4/ Supported vinyl was not used for shoe uppers until the late 1940's or early 1950's. When footwear with supported-vinyl uppers was imported during the 1950's and early 1960's, it was generally dutiable, by virtue of the similitude provisions of par. 1559, at the rate provided for "similar" leather footwear in par. 1530(e). The column 2 rate for item 700.55 is 35 percent.

5/ The trade-agreement rate established in the TSUS, effective Aug. 31, 1963, under authority of the Tariff Classification Act of 1962 (Public Law 87-456) to replace the wide range of rates previously applicable to the various types of footwear provided for in this TSUS item.

Note.--Pursuant to Presidential Proclamation No. 4074, effective from Aug. 16 to Dec. 19, 1971, the rates of duty on most imported products were increased by the temporary imposition of an additional duty of 10 percent ad valorem or less, as provided for in new subpt. C to pt. 2 of the appendix to the TSUS.

Table 2--Leather footwear for women and misses made by the turn or turned process (item 700.20): U.S. rates of duty and imports for consumption, specified years 1939 to 1973

Year	Rate of duty <u>Percent ad valorem</u>	Imports	
		1,000	pairs
1939-----:	1/ 10	:	5
1946-----:	10	:	4
1955-----:	2/ 5	:	10
1956-----:	5	:	97
1957-----:	5	:	209
1958-----:	5	:	434
1959-----:	5	:	402
1960-----:	5	:	664
1961-----:	5	:	882
1962-----:	5	:	1,067
1963-----:	5	:	916
1964-----:	5	:	864
1965-----:	5	:	1,053
1966-----:	5	:	1,106
1967-----:	5	:	1,361
1968-----:	4	:	1,905
1969-----:	4	:	2,459
1970-----:	3	:	2,398
1971-----:	3	:	1,604
1972-----:	2.5	:	1,589
1973-----:	2.5	:	1,178

1/ Effective January 1, 1932, the statutory rate of 20 percent ad valorem was reduced to 10 percent pursuant to sec. 336 of the Tariff Act of 1930.

2/ GATT concession, effective May 30, 1950.

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

Table 3.--Leather footwear for women and misses, made principally by the cement process (items 700.43 and 700.45): U.S. rates of duty and imports for consumption, specified years 1939 to 1973

Year	Rate of duty 1/		Quantity	
	Item 700.43	Item 700.45	Item 700.43	Item 700.45
	Percent <u>ad valorem</u>	Percent <u>ad valorem</u>	Million <u>pairs</u>	Million <u>pairs</u>
1939-----	20			2
1946-----	20			1
1955-----	20			1
1956-----	20			1
1957-----	20			2
1958-----	20			9
1959-----	20			5
1960-----	20			7
1961-----	20			9
1962-----	20			12
1963-----	20			17
1964-----	20			19
1965-----	20			21
1966-----	20			28
1967-----	20			38
1968-----	19 :	18 :	34 :	20
1969-----	18 :	16 :	29 :	27
1970-----	17 :	14 :	37 :	35
1971-----	16 :	12 :	33 :	44
1972-----	15 :	10 :	25 :	61
1973 2/-----	15 :	10 :	17 :	69

1/ Statutory rate under par. 1530(e) for 1939 and 1946 through Aug. 30, 1963, and under TSUS item 700.40 for Aug. 31, 1963, through 1967. Effective Jan. 1, 1968, new items 700.41 (sandals of buffalo leather), 700.43, and 700.45 replaced item 700.40.

2/ U.S. imports of sandals under item 700.41 amounted to about 2 million pairs in this year.

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

Table 4.--Footwear having supported-vinyl uppers for women and misses
 (item 700.5545): U.S. rates of duty and imports for consumption,
1934 1/, and 1964-73

Year	Rate of duty	Imports			Unit value
		Quantity	Value		
	Percent ad valorem	1,000 pairs	1,000 dollars		
1964 2/-----:	3/ 12.5 :	27,574 :	12,429 :	\$0.45	
1965 2/-----:	12.5 :	29,579 :	13,564 :	.46	
1966-----:	12.5 :	33,239 :	17,024 :	.51	
1967-----:	12.5 :	49,767 :	27,704 :	.56	
1968-----:	11 :	68,579 :	46,603 :	.68	
1969-----:	10 :	70,777 :	55,820 :	.79	
1970-----:	8.5 :	77,288 :	73,757 :	.95	
1971-----:	7 :	86,942 :	104,196 :	1.20	
1972-----:	6 :	89,776 :	104,907 :	1.22	
1973-----:	6 :	96,942 :	136,036 :	1.40	

1/ During the period before the TSUS became effective, footwear with supported-vinyl uppers (with soles other than india rubber) was generally dutiable by virtue of the similitude provisions of par. 1559 of the Tariff Act of 1930, at a rate provided for similar leather footwear in par. 1530(e), principally 20 percent ad valorem. The column 2 rate for item 700.55 is 35 percent.

Data are not available on U.S. imports of footwear with supported-vinyl uppers for the years prior to 1964. Such imports were probably negligible until the mid-1950's.

2/ Data are partly estimated.

3/ Rate established in the TSUS, effective Aug. 31, 1963.

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

Table 5.--Nonrubber footwear for women: U.S. imports,
by selected TSUSA items, 1968-73

TSUSA item No.	Description	1968	1969	1970	1971	1972	1973
Quantity (1,000 pairs)							
	Footwear of leather:						
	Valued not over \$2.50						
	per pair:						
	Casual footwear:						
700.4310	For women-----	19,024	12,015	11,905	8,298	4,189	2,339
700.4340	Cement footwear:						
	For women-----	11,891	13,532	21,159	20,008	17,685	11,679
	Valued over \$2.50 per						
	pair:						
	Casual footwear:						
700.4510	For women-----	1,428	1,922	2,489	3,554	6,348	6,651
	Cement footwear:						
700.4540	For women-----	16,884	22,734	28,471	37,563	51,250	56,991
	Supported-vinyl uppers:						
700.5545	For women and misses---	68,579	70,777	77,288	86,942	89,776	96,942
	Total-----	117,806	120,980	141,312	156,365	169,248	174,602
Value (1,000 dollars)							
	Footwear of leather:						
	Valued not over \$2.50						
	per pair:						
	Casual footwear:						
700.4310	For women-----	27,539	17,749	18,238	13,256	7,084	4,043
700.4340	Cement footwear:						
	For women-----	19,265	22,144	35,614	34,437	30,153	20,778
	Valued over \$2.50 per						
	pair:						
	Casual footwear:						
700.4510	For women-----	5,293	7,899	10,007	13,711	24,701	28,292
	Cement footwear:						
700.4540	For women-----	76,236	112,866	146,162	193,846	262,403	304,376
	Supported vinyl uppers:						
700.5545	For women and misses---	46,603	55,820	73,757	104,196	109,907	136,036
	Total-----	174,936	216,478	283,778	359,446	434,248	493,525
Unit value (per pair)							
	Footwear of leather:						
	Valued not over \$2.50						
	per pair:						
	Casual footwear:						
700.4310	For women-----	\$1.45	\$1.48	\$1.53	\$1.60	\$1.69	\$1.73
700.4340	Cement footwear:						
	For women-----	1.62	1.64	1.68	1.72	1.70	1.78
	Valued over \$2.50 per						
	pair:						
	Casual footwear:						
700.4510	For women-----	3.71	4.11	4.02	3.86	3.89	4.25
	Cement footwear:						
700.4540	For women-----	4.52	4.96	5.13	5.16	5.12	5.34
	Supported-vinyl uppers:						
700.5545	For women and misses---	.68	.79	.95	1.20	1.22	1.40
	Average-----	1.48	1.79	2.01	2.30	2.57	2.83

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

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