

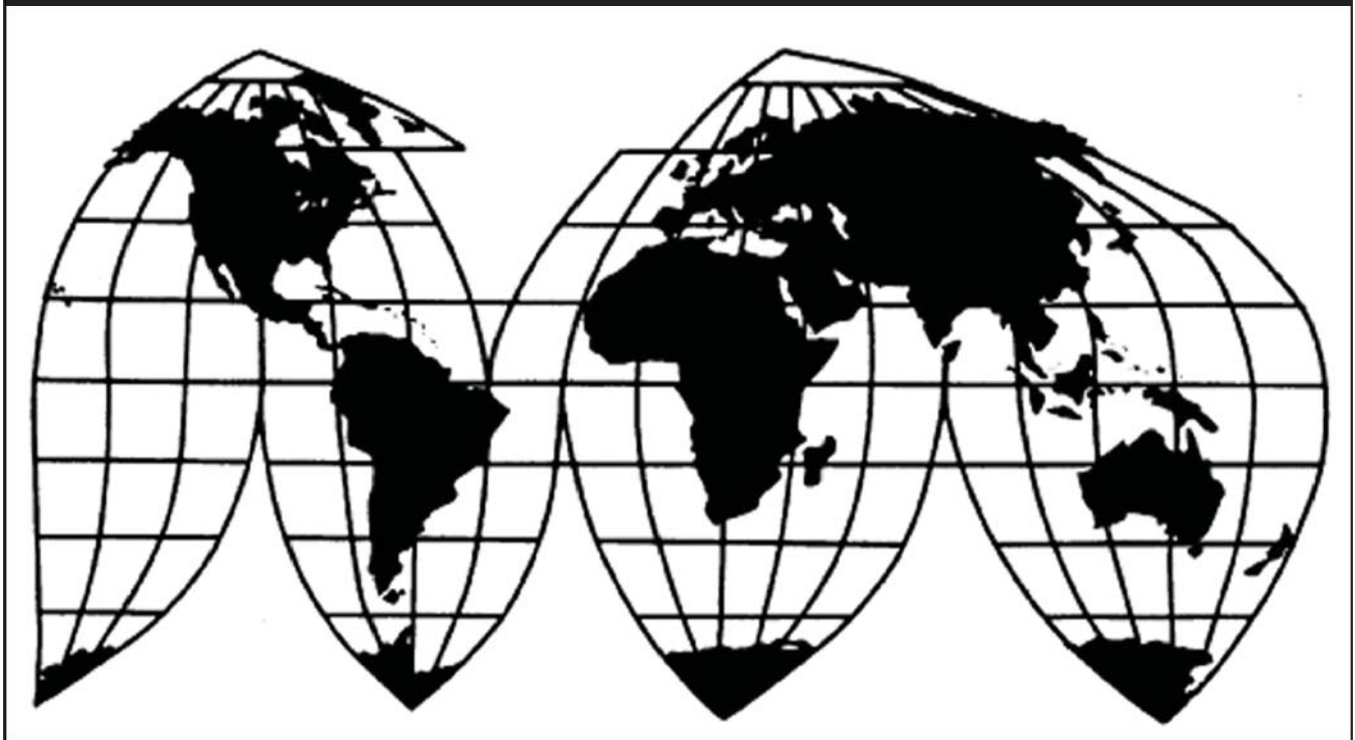
# Ironing Tables and Certain Parts Thereof from China

Investigation No. 731-TA-1047 (Second Review)

Publication 4568

September 2015

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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**UNITED STATES INTERNATIONAL TRADE COMMISSION**

Investigation No. 731-TA-1047 (Second Review)

Ironing Tables and Certain Parts Thereof from China

**DETERMINATION**

On the basis of the record<sup>1</sup> developed in the subject five-year review, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930, that revocation of the antidumping duty order on ironing tables and certain parts thereof from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

**BACKGROUND**

The Commission, pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)), instituted this review on May 1, 2015 (80 F.R. 24968) and determined on August 4, 2015 that it would conduct an expedited review (80 F.R. 50027, August 18, 2015).

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<sup>1</sup> The record is defined in sec. 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR § 207.2(f)).





## Views of the Commission

Based on the record in this five-year review, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping duty order on ironing tables and certain parts thereof (“ironing tables”) from China would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### I. Background

The Commission instituted the original investigation of ironing tables from China on June 30, 2003, based on a petition filed by Home Products International, Inc. (“HPI”).<sup>1</sup> On July 29, 2004, the Commission determined that an industry in the United States was materially injured by reason of imports of ironing tables from China that the U.S. Department of Commerce (“Commerce”) found to be sold at less-than-fair value (“LTFV”).<sup>2</sup> Commerce issued an antidumping duty order on subject imports of floor-standing, metal-top ironing tables and parts thereof from China on August 6, 2004.<sup>3</sup>

The Commission instituted its first five-year review concerning the antidumping duty order on ironing tables from China on June 29, 2009.<sup>4</sup> HPI, the domestic producer accounting for virtually all domestic production during the first period of review (“POR”), and one exporter and three importers of the subject merchandise filed responses to the Commission’s notice of institution. On October 5, 2009, the Commission determined to conduct a full review.<sup>5</sup> On June 8, 2010, the Commission determined that revocation of the antidumping duty order on ironing tables from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>6</sup> Commerce issued a continuation of the antidumping duty order on June 21, 2010.<sup>7</sup>

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<sup>1</sup> *Ironing Tables and Certain Parts Thereof from China*, Inv. No. 731-TA-1047 (Final), USITC Pub. 3711 (July 2004) (“*Original Determination*”) at I-1.

<sup>2</sup> *Original Determination*, USITC Pub. 3711, at 3. One Commissioner found that the domestic industry was threatened with material injury by reason of subject imports from China sold at LTFV. See *id.* at 31-45.

<sup>3</sup> *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Floor-Standing Metal-Top Ironing Tables and Parts Thereof from the People’s Republic of China*, 69 Fed. Reg. 47868 (August 6, 2004).

<sup>4</sup> *Ironing Tables from China*, 74 Fed. Reg. 31755 (July 1, 2009).

<sup>5</sup> *Ironing Tables from China*, 74 Fed. Reg. 54066 (October 21, 2009).

<sup>6</sup> *Ironing Tables and Certain Parts Thereof from China*, Inv. No. 731-TA-1047 (Review), USITC Pub. 4155 (June 2010) (“*First Review*”) at 3; and *Ironing Tables and Certain Parts Thereof from China; Determination*, 75 Fed. Reg. 33636 (June 14, 2010).

<sup>7</sup> *Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof From the People’s Republic of China: Continuation of the Antidumping Duty Order*, 75 Fed. Reg. 36629, 36630 (June 28, 2010).

The Commission instituted the current review on May 1, 2015.<sup>8</sup> The Commission received only one substantive response to the notice of institution, which was from HPI. HPI accounted for \*\*\* percent of total U.S. production of ironing tables in 2014.<sup>9</sup> On August 4, 2015, the Commission determined to conduct an expedited review pursuant to section 751(c)(3) of the Tariff Act.<sup>10</sup> HPI subsequently filed comments on September 2, 2015.

## II. Domestic Like Product and Industry

### A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”<sup>11</sup> The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”<sup>12</sup> The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.<sup>13</sup>

Commerce has defined the scope of the antidumping duty order in this five-year review as follows:

For purposes of the order, the product covered consists of floor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an

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<sup>8</sup> 80 Fed. Reg. 24968 (May 1, 2015).

<sup>9</sup> Confidential Report (“CR”) at Table I-1 and Public Report (“PR”) at Table I-1; HPI Response to Commission’s Notice of institution, May 27, 2015 (“HPI Response”) at 31.

<sup>10</sup> 19 U.S.C. § 1675(c)(3). The Commission determined that HPI’s individual response and the domestic interested party group response were adequate and that the respondent interested party group response was inadequate. The Commission did not find any circumstances that warranted conducting a full review. Explanation of Commission Determination on Adequacy, EDIS Doc. 562711 (August 10, 2015).

<sup>11</sup> 19 U.S.C. § 1677(4)(A).

<sup>12</sup> 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96<sup>th</sup> Cong., 1<sup>st</sup> Sess. 90-91 (1979).

<sup>13</sup> *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with various features, including iron rests, linen racks, and others. The subject ironing tables may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this review.

Furthermore, the order specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. For purposes of the order, the term "unassembled" ironing table means a product requiring the attachment of the leg assembly to the top or the attachment of an included feature such as an iron rest or linen rack. The term "complete" ironing table means product sold as a ready-to-use ensemble consisting of the metaltop table and a pad and cover, with or without additional features, *e.g.*, iron rest or linen rack. The term "incomplete" ironing table means product shipped or sold as a "bare board" --*i.e.*, a metal-top table only, without the pad and cover--with or without additional features, *e.g.* iron rest or linen rack. The major parts or components of ironing tables that are intended to be covered by the order under the term "certain parts thereof" consist of the metal top component (with or without assembled supports and slides) and/or the leg components, whether or not attached together as a leg assembly. The order covers separately shipped metal top components and leg components, without regard to whether the respective quantities would yield an exact quantity of assembled ironing tables.

Ironing tables without legs (such as models that mount on walls or over doors) are not floorstanding and are specifically excluded. Additionally, tabletop or countertop models with short legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded.<sup>14</sup>

The scope definition set out above is unchanged from Commerce's prior scope determinations.<sup>15</sup>

The term "ironing tables" is used to distinguish the subject floor-standing metal top product from "ironing boards," which are excluded from the scope. Ironing tables are used in households, hotel rooms, and workplaces for the purpose of pressing apparel and other textile items. By contrast, ironing boards can be placed on a countertop, tabletop, and over-the-door, or may be wall-mounted. The standard size of an ironing table is 48 to 54 inches in length and

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<sup>14</sup> *Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof From the People's Republic of China: Final Results of the Second Expedited Sunset Review of the Antidumping Duty Order*, 80 Fed. Reg. 53281, 53282 (September 3, 2015) ("*Second Sunset Review*"); IA ACCESS Doc. 3301097-01 at 2.

<sup>15</sup> See *Original Determination*, USITC Pub. 3711, at 5; *First Five-Year Review*, USITC Pub. 4155, at 4-5.

13 to 18 inches in width. The table may be equipped with special features such as an iron rest or linen racks.<sup>16</sup>

The principal components of an ironing table are its metal ironing surface, legs, feet, slide bar, handle, hangers, ribs, and foot cover. Ironing tables and their components are produced from flat-rolled steel and wire, as well as fasteners, plastic fittings, foam, and textile fabric. The ironing surface of ironing tables is either mesh-top or perforated-top. The T-leg stand is the most popular configuration. A T-leg ironing table is made of a single metal tube inserted into a metal leg base that is shaped as an inverted “T.” A 4-leg ironing table has two legs, each made of two metal tubes that run parallel to each other, flare out to form a 4-footed base on the floor, and typically have a cross brace at or near the flare or at the end of the tubes. In each system, users press a lever that allows the legs to drop down and subsequently raise the height of the table or fold it flat for storage.<sup>17</sup>

In both its original investigation and its first five-year review, the Commission defined a single domestic like product as floor-standing, steel-top ironing tables, coextensive with Commerce’s scope.<sup>18</sup> In the original determination, the Commission rejected an argument that the domestic like product should be defined more broadly than the scope to include over-the-door ironing boards. It found that, notwithstanding some overlaps in physical characteristics, uses, and manufacturing facilities, there were substantial differences between ironing tables and over-the-door ironing boards with respect to interchangeability, customer and producer perceptions, and price.<sup>19</sup> The definition of the domestic like product was not disputed during the first five-year review.<sup>20</sup>

In this review, the record contains no new information that would suggest any reason to revisit the Commission’s domestic like product definition in the original investigation and first five-year review.<sup>21</sup> HPI has indicated that it agrees with the Commission’s definition of the domestic like product in the original investigation and first five-year review.<sup>22</sup> Therefore, we define the domestic like product as ironing tables coextensive with the scope of Commerce’s order.

## **B. Domestic Industry**

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of

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<sup>16</sup> CR at I-5, PR at I-4.

<sup>17</sup> CR at I-6, PR at I-4 to I-5.

<sup>18</sup> *Original Determination*, USITC Pub. 3711, at 8; *First Five-Year Review*, USITC Pub. 4155, at 5.

<sup>19</sup> *Original Determination*, USITC Pub. 3711, at 6-7.

<sup>20</sup> *First Five-Year Review*, USITC Pub. 4155, at 5.

<sup>21</sup> *See generally*, CR at I-11 to I-13, PR at I-8 to I-9.

<sup>22</sup> HPI Response at 35; HPI Comments Regarding What Determination the Commission Should Reach in the Review (September 2, 2015) (“HPI Comments”) at 2.

the product.”<sup>23</sup> In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In both the original investigation and first five-year review, the Commission defined the domestic industry as consisting of all domestic producers of ironing tables.<sup>24</sup> In this second five-year review, there are no related party issues<sup>25</sup> and HPI stated that it agrees with the definition of the domestic industry proposed in the notice of institution, which was the same definition as used in the original investigation and first five-year review.<sup>26</sup> Accordingly, we define the domestic industry as consisting of all domestic producers of ironing tables, namely HPI.

### **III. Revocation of the Antidumping Duty Order Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time**

#### **A. Legal Standards**

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”<sup>27</sup> The Uruguay Round Agreements Act Statement of Administrative Action (“SAA”) states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”<sup>28</sup> Thus, the likelihood standard is prospective in

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<sup>23</sup> 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. See 19 U.S.C. § 1677.

<sup>24</sup> *Original Determination*, USITC Pub. 3711, at 9, *First Five-Year Review*, USITC Pub. 4155, at 6. In the original investigation, both domestic producers were related parties, but the Commission found that appropriate circumstances did not exist to exclude any producer from the domestic industry. *Original Determination*, USITC Pub. 3711, at 9. There were no related party issues in the first five-year review. *First Five-Year Review*, USITC Pub. 4155, at 6 n.8.

<sup>25</sup> CR at I-17 and n.37, PR at I-12 and n.37.

<sup>26</sup> HPI Response at 35; HPI Comments at 2.

<sup>27</sup> 19 U.S.C. § 1675a(a).

<sup>28</sup> SAA, H.R. Rep. 103-316, vol. I (1994), at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

nature.<sup>29</sup> The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.<sup>30</sup>

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”<sup>31</sup> According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”<sup>32</sup>

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”<sup>33</sup> It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).<sup>34</sup> The statute further provides

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<sup>29</sup> While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

<sup>30</sup> See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

<sup>31</sup> 19 U.S.C. § 1675a(a)(5).

<sup>32</sup> SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

<sup>33</sup> 19 U.S.C. § 1675a(a)(1).

<sup>34</sup> 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings regarding imports of ironing tables from China. CR at I-14, PR at I-10.

that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.<sup>35</sup>

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.<sup>36</sup> In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.<sup>37</sup>

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.<sup>38</sup>

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.<sup>39</sup> All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to

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<sup>35</sup> 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

<sup>36</sup> 19 U.S.C. § 1675a(a)(2).

<sup>37</sup> 19 U.S.C. § 1675a(a)(2)(A-D).

<sup>38</sup> See 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

<sup>39</sup> 19 U.S.C. § 1675a(a)(4).

which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.<sup>40</sup>

No respondent interested party participated in this expedited review. Therefore, the record contains limited new information with respect to the ironing table industry in China. There also is limited information on the U.S. ironing table market during the POR. Accordingly, for our determination, we rely as appropriate on the facts available from the original investigation, the first five-year review, and the limited new information on the record in this second five-year review.

## **B. Conditions of Competition and the Business Cycle**

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>41</sup> The following conditions of competition inform our determination.

### **1. Demand Conditions**

*Demand.* In the original investigation, the Commission found that the market for ironing tables was relatively stable over the January 2001-March 2004 period of investigation (“POI”) and was characterized as mature with only modest growth. It found that the overall demand for ironing tables was likely to exhibit little change in response to changes in price.<sup>42</sup> The Commission found that, although ironing tables were available with a range of features and prices, far more lower-priced models entered the U.S. market than higher priced models; more than three-quarters of ironing tables consumed in the United States over the POI reportedly were in the opening price point category.<sup>43</sup> In addition, the Commission found increased concentration among buyers as the number of retail purchasers fell over the POI, with a few mass merchandisers dominating direct sales to consumers.<sup>44</sup>

In the first five-year review, the Commission found that overall U.S. demand for ironing tables moved in tandem with general activity in the U.S. economy, particularly with household formation and home purchases. U.S. demand for ironing tables exhibited some seasonal variation and was subject to cyclical fluctuations. As a consumer durable good, ironing table purchases were deferrable and tended to fall during economic downturns. The demand for

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<sup>40</sup> The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

<sup>41</sup> 19 U.S.C. § 1675a(a)(4).

<sup>42</sup> *Original Determination*, USITC Pub. 3711, at 9-10.

<sup>43</sup> *Original Determination*, USITC Pub. 3711, at 10.

<sup>44</sup> *Original Determination*, USITC Pub. 3711, at 10.



ironing tables as measured by apparent U.S. consumption fluctuated over the 2004-2009 POR, but decreased overall. Ironing tables reportedly were sold in as many as five different retail price point categories and more than three quarters of ironing tables consumed in the United States reportedly were in the opening price point category.<sup>45</sup> The Commission also found that direct shipments of ironing tables during the period were principally to retailers, followed by commercial users and distributors. Retailers sold their ironing tables almost exclusively to household consumers. It also found that commercial users consisted primarily of the hospitality industry (hotels and motels) and healthcare facilities.<sup>46</sup>

In this review, the available data show that demand for ironing tables has decreased slightly since 2009.<sup>47</sup> HPI attributed this decrease to the slow general economic recovery, advances in fabric technology leading to more “no-iron” fabrics and garments, and demographic shifts that have resulted in a disinclination towards ironing.<sup>48</sup> It further stated that demand for ironing tables is driven typically by major life events that create new households (such as marriage, divorce, and college attendance) that have shown some positive growth.<sup>49</sup>

## 2. Supply Conditions

In the original investigation, the Commission found that the domestic industry’s share of apparent U.S. consumption had declined steadily and significantly between 2001 and 2003.<sup>50</sup> The Commission found that HPI closed a plant and consolidated production at another facility, while the only other U.S. producer, Whitney Design, closed its U.S. production facility during the POI. Even in light of these closings, the Commission found that the domestic industry still had \*\*\* capacity to supply the U.S. market. Subject imports, however, captured nearly \*\*\* of the U.S. market in 2003. The Commission found that sales of nonsubject ironing tables were almost nonexistent and consisted mostly of higher-value products.<sup>51</sup>

In the first five-year review, the Commission found that HPI was the only domestic producer of ironing tables during the POR. The domestic industry’s annual capacity was unchanged from 2004 to 2009 and the industry’s share of the U.S. market fluctuated. Subject imports’ share also fluctuated. Nonsubject imports’ market share fell in each year of the POR

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<sup>45</sup> *First Five-Year Review*, USITC Pub. 4155, at 10.

<sup>46</sup> *First Five-Year Review*, USITC Pub. 4155, at 11.

<sup>47</sup> Apparent U.S consumption of ironing tables was \*\*\* units in 2014 compared to \*\*\* units in 2009. CR/PR at Table I-6. Import data for subject and nonsubject imports for 2014 were obtained from official import statistics for a tariff subheading, 9403.90.8041, that includes metal components other than ironing tables and parts thereof. Consequently, apparent U.S. consumption for 2014 may be overstated. CR/PR at Table I-6 and note.

<sup>48</sup> HPI Response at 34-35; HPI Comments at 5.

<sup>49</sup> HPI Response at 35; HPI Comments at 7.

<sup>50</sup> *Original Determination*, USITC Pub. 3711, at 10.

<sup>51</sup> *Original Determination*, USITC Pub. 3711, at 10-11.

after 2005. By 2009, nonsubject imports accounted for only a small percentage of apparent U.S. consumption.<sup>52</sup>

In this review, HPI is the sole domestic producer and the largest supplier of ironing tables to the U.S. market. The domestic industry's share of the quantity of apparent U.S. consumption was \*\*\* percent in 2014, which was less than its \*\*\* percent share in 2009 but greater than its \*\*\* percent share in 2003.<sup>53</sup>

The record shows that subject imports have maintained an appreciable, albeit substantially decreasing, presence in the U.S. market since the imposition of the antidumping duty order in 2003. Subject imports' share of the quantity of apparent U.S. consumption was \*\*\* percent in 2003, \*\*\* percent in 2009, and \*\*\* percent in 2014.<sup>54</sup> Nonsubject imports have increased their presence in the U.S. market since 2009.<sup>55</sup>

### 3. Substitutability

In the original determination, the Commission found that there was a relatively high degree of substitutability between the domestic like product and subject imports. The vast majority of market participants reported that they were always interchangeable.<sup>56</sup>

In the first five-year review, the Commission again found there was a high degree of substitutability between domestically produced ironing tables and the subject imports. Responding wholesale purchasers listed price and quality as the most important factors affecting their purchasing decisions. The Commission also found that raw material costs accounted for a substantial share of the cost of goods sold ("COGS") for ironing tables.<sup>57</sup>

Nothing in the record of this review suggests that the high degree of substitutability between domestically produced ironing tables and the subject imports or the importance of price in purchasing decisions have changed since the prior determinations. Moreover, HPI reports that raw material costs continue to account for a substantial share of the COGS for ironing tables.<sup>58</sup>

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<sup>52</sup> *First Five-Year Review*, USITC Pub. 4155, at 11-12.

<sup>53</sup> CR/PR at Table I-6.

<sup>54</sup> CR/PR at Table I-6.

<sup>55</sup> CR/PR at Tables I-5 and I-6. Nonsubject imports' share of the quantity of apparent U.S. consumption was \*\*\* percent in 2003, \*\*\* percent in 2009, and \*\*\* percent in 2014. CR/PR at Table I-6. As discussed above, import data for subject and nonsubject imports during the POR were based on a subheading of official import statistics which included metal products other than ironing tables and parts thereof and, therefore, may be overstated. *Id.*

<sup>56</sup> *Original Determination*, USITC Pub. 3711, at 11.

<sup>57</sup> *First Five-Year Review*, USITC Pub. 4155, at 12.

<sup>58</sup> CR at I-27 to I-28, PR at I-18; Response at 13. HPI reported that ironing tables usually require about nine pounds of steel and that raw material costs represented approximately \*\*\* percent of total COGS during the POR. *Id.*

## **C. Likely Volume of Subject Imports**

### **1. Original Investigation**

In the original investigation, the Commission found that the volume and market share of subject imports increased substantially throughout the POI. The Commission found that subject imports nearly quadrupled in terms of quantity and nearly tripled in terms of value between 2001 and 2003. Although subject imports declined in January-March (“interim”) 2004, the Commission attributed the decline to the filing of the petition and the imposition of provisional duties in February 2004. The Commission also found that subject import market share increased dramatically between 2001 and 2003, while the domestic industry’s share of apparent U.S. consumption fell entirely due to subject imports. Finally, the Commission found that moderate price declines did not significantly increase purchases over the POI due to the long-lasting nature of ironing tables as a durable good. Consequently, the Commission determined that the increased volumes of LTFV subject imports had taken market share from the remaining domestic producer, HPI, rather than resulting in increased domestic consumption.<sup>59</sup>

The Commission also found that both perforated-top and mesh-top ironing tables were purchased by large customers, and that HPI produced both types and had capacity to produce substantially higher volumes. Consequently, the Commission found both the volume and the increase in volume of subject imports to be significant, both in absolute terms and relative to consumption and production in the United States.<sup>60</sup>

### **2. First Five-Year Review**

In the first five-year review, the Commission found that substantial volumes of subject imports had been present in the U.S. market over the POR even with the order in place. Although the record contained data for only part of the Chinese industry, it indicated that Chinese producers had considerable production capacity and unused capacity. Based on the Chinese industry’s reported capacity utilization rate, the Commission found that unused capacity existed in China that could be used to increase ironing table production if the antidumping duty order were revoked.<sup>61</sup>

The Commission also found that the Chinese industry was highly export-oriented, with significant exports to both the European Union (“EU”) and the United States, while the home market accounted for a small percentage of shipments. It found that the United States remained a very important market for Chinese producers, who continued to maintain a substantial presence in the U.S. market during the POR despite the order. Also, the Chinese producers had established business relationships with U.S. purchasers of ironing tables that

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<sup>59</sup> *Original Determination*, USITC Pub. 3711, at 12.

<sup>60</sup> *Original Determination*, USITC Pub. 3711, at 13-14.

<sup>61</sup> *First Five-Year Review*, USITC Pub. 4155, at 13-14.

would enable them to increase shipments to the United States substantially in the event of revocation. Moreover, the Chinese industry faced a significant import barrier in the EU, one of its main export markets, after the EU imposed antidumping duties on imports of ironing tables from China in April 2007.<sup>62</sup> Finally, the Commission found that end-of-period inventories of ironing tables held by producers in China increased steadily over the POR and were markedly higher in 2009 than in 2004.

Based on the rapid increase of subject imports and their market share during the original investigation, the substantial volumes of subject imports present during the POR despite the order, the substantial production capacity, excess capacity, and export orientation of the Chinese industry, the importance of the U.S. market to Chinese producers, the EU antidumping order, and Chinese producers' inventories, the Commission found that Chinese producers would have the ability and incentive to ship significant volumes of additional exports to the United States if the order were revoked. Therefore, it found that the likely volume of subject imports, both in absolute terms and relative to production and consumption in the United States, would be significant if the order were revoked.<sup>63</sup>

### 3. Current Review

Although subject imports have continued to be present in the U.S. market, the order has had a disciplining effect on the volume. During the POR, the annual quantity of subject imports fluctuated, and was 1.1 million units in 2012, 403,000 units in 2013, and 439,000 units in 2014.<sup>64</sup> By contrast, during the original investigation, peak annual subject import volume was \*\*\* units.<sup>65</sup>

We find that, if the antidumping duty order is revoked, subject import volume would likely increase and be significant. As previously discussed, the Commission found in the first five-year review that the subject industry had substantial capacity and excess capacity, based on the questionnaire responses of only six of 31 known producers of the subject merchandise.<sup>66</sup> The limited information available in the current review indicates that this is still the case; HPI has identified 23 entities in China that it states produce subject merchandise.<sup>67</sup> Consequently, the information available indicates that the subject industry in China maintains the ability to increase exports of the subject merchandise substantially.

Additionally, the record indicates that the industry in China also has the incentive to increase subject imports upon revocation of the order. The Commission found in the first five-

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<sup>62</sup> *First Five-Year Review*, USITC Pub. 4155, at 14.

<sup>63</sup> *First Five-Year Review*, USITC Pub. 4155, at 14.

<sup>64</sup> CR/PR at Table I-4. As previously stated, these quantities may be overstated because the official import statistics include some out-of-scope merchandise.

<sup>65</sup> See CR/PR at Table I-6, Appendix C.

<sup>66</sup> *First Five-Year Review*, USITC Pub. 4155 at 13-14.

<sup>67</sup> HPI Response at 29-30. HPI also asserts that Chinese production capacity could be readily increased because any metal-forming facility has the ability to switch production to ironing tables from other products. *Id.* at 24-25

year review that the subject industry was export-oriented,<sup>68</sup> and the information available in this review indicates that continues to be true. As stated above, there was an appreciable quantity of subject imports during the current POR despite the order. Moreover, HPI has provided instances of \*\*\* in Canada obtaining ironing tables from China.<sup>69</sup> Furthermore, ironing tables from China are subject to antidumping duties in Canada and the EU, providing subject producers in China with additional incentive to direct exports to the U.S. market upon revocation of the order, particularly since the EU duties have reportedly caused a marked reduction in the share of the EU market held by ironing boards from China.<sup>70</sup>

In light of the foregoing considerations and the increases in subject import volume and market share that occurred prior to imposition of the order, we find that the Chinese industry would likely ship increasing and significant volumes of ironing tables to the United States if the order were revoked. We therefore find that the likely volume of subject imports, both in absolute terms and relative to consumption in the United States, would be significant if the order were revoked.

#### **D. Likely Price Effects**

##### **1. Original Investigation**

In the original investigation, the Commission found that the domestic like product and subject imports were interchangeable and that price was the most important factor in purchasing decisions. The Commission found there was a concentration of purchasers at the wholesale level, with a significant quantity of the ironing tables sold to only three customers. These few large buyers could negotiate lower prices, and lower retail pricing by one may have resulted in widespread downward retail pricing that could cause downward pressure on wholesale prices.<sup>71</sup>

The Commission found a wide range of prices between the opening price point and the various higher priced models, with mesh-top ironing tables historically more expensive than perforated-top ironing tables. The Commission relied principally on price comparisons between domestically produced and subject import mesh-top ironing tables. Pricing data showed that prices for Chinese mesh-top T-leg ironing tables were generally higher than those for comparable domestic product through the first quarter of 2002. Thereafter, the Chinese tables were priced lower than domestic product as subject import volumes rose and subject import prices fell. The Commission found significant underselling for this product, particularly in light of the large increase in import volumes in 2003.<sup>72</sup>

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<sup>68</sup> *First Five-Year Review*, USITC Pub. 4155 at 13.

<sup>69</sup> HPI Response at 21-22.

<sup>70</sup> CR at I-4, I-30, PR at I-3, I-19. The record of the current review does not contain any information about inventories of the subject merchandise in China.

<sup>71</sup> *Original Determination*, USITC Pub. 3711, at 14.

<sup>72</sup> *Original Determination*, USITC Pub. 3711, at 14-15.

The Commission found that the evidence regarding lost sales and revenues indicated that subject imports of mesh-top tables were overtaking the market previously dominated by domestic perforated-top tables through underselling and driving prices lower. Given that more than 75 percent of domestic consumption reportedly was in the opening price point category and the majority of HPI's sales into this category were perforated-top ironing tables, the Commission found significant price depression based on the product-specific data, as well as other information in the record, including information on lost sales and revenues.<sup>73</sup>

As a result, the Commission concluded that there had been significant price underselling by the subject imports and that the effect of such imports had been to depress prices for the domestic like product to a significant degree.<sup>74</sup>

## **2. First Five-Year Review**

In the first five-year review, the Commission found that Chinese and domestic ironing tables were interchangeable and price was an important factor in purchasing decisions. The Commission collected pricing data on six products with pad and cover, but without additional equipment. The Commission concluded, however, that a number of factors, including differences in model configuration and direct importations, caused the price data for both the domestic like product and subject imports to be unrepresentative of actual price competition during the POR. Given these considerations, the Commission placed only limited weight on the price comparison data for the POR.<sup>75</sup> Thus, based on the finding of significant underselling during the original investigation, the significant likely volumes of subject imports if the order were revoked, the nature of the product and the market, the high degree of price competition between the domestic like product and the subject imports, and the substantial influence over U.S. prices as well as the buying market power exercised by the few large wholesale customers, the Commission found that the subject imports from China likely would significantly undersell the domestic like product to gain market share and likely would have significant depressing or suppressing effects on the prices of the domestic like product if the order were revoked.<sup>76</sup>

## **3. Current Review**

In this review, the record does not contain current pricing comparisons due to the failure of respondent interested parties to participate and the expedited nature of the review. We continue to find, in the absence of record evidence indicating changes in the conditions of competition, that the domestic like product and subject imports are highly substitutable and that price is an important factor in purchasing decisions. Consequently, if the order were

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<sup>73</sup> *Original Determination*, USITC Pub. 3711, at 15-16.

<sup>74</sup> *Original Determination*, USITC Pub. 3711, at 16.

<sup>75</sup> *First Five-Year Review*, USITC Pub. 4155, at 16-17.

<sup>76</sup> *First Five-Year Review*, USITC Pub. 4155, at 17.

revoked, subject imports would likely undersell the domestic like product to gain market share, as occurred during the original POI.

We find that, in the event of revocation, increasing volumes of low-priced subject imports would likely have significant depressing or suppressing effects on prices of the domestic like product. We therefore conclude that the likely significant volume of subject imports upon revocation would likely have significant effects on prices for the domestic like product.

## **E. Likely Impact<sup>77</sup>**

### **1. Original Investigation**

In the original investigation, the Commission found that the exit of Whitney Design from the industry in April 2002 significantly reduced domestic production capacity. Even accounting for this development, the Commission found that the data for HPI, the sole domestic producer after April 2002, indicated that production and capacity utilization decreased significantly between 2001 and 2003. Although the domestic industry's end-of-period inventories fluctuated over the period and remained steady when comparing 2003 with 2001, the Commission found that the ratio of inventories to production and U.S. shipments \*\*\* between 2001 and 2003.<sup>78</sup>

The Commission found that employment-related and financial indicators declined over the period as well. Although the Commission found the domestic industry profitable in 2003 and the industry's operating income ratio remained \*\*\* during the period, it explained that operating income ratio is only one of many factors the Commission examines in making its finding with respect to the impact of subject imports on the domestic industry. The Commission found that most of the industry's cost of goods sold was \*\*\*, and that the cost of HPI's plant and equipment was \*\*. Thus, because the \*\*, the Commission found that the \*\*. The Commission concluded that the \*\* of operating leverage reflected in the manufacturing cost structure of ironing tables helped to explain how the industry was able to maintain \*\* operating margins despite experiencing declines in sales and production volume. As a result, the Commission found that the injury to the domestic industry manifested itself

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<sup>77</sup> Under the statute, "the Commission may consider the magnitude of the margin of dumping" in making its determination in a five-year review. 19 U.S.C. § 1675a(a)(6). The statute defines the "magnitude of the margin of dumping" to be used by the Commission in five-year reviews as "the dumping margin or margins determined by the administering authority under section 1675a(c)(3) of this title." 19 U.S.C. § 1677(35)(C)(iv); *see also* SAA at 887. In its expedited second sunset review of the antidumping duty order on ironing tables from China, Commerce found that revocation of the order would be likely to lead to continuation or recurrence of dumping at weighted-average dumping margins up to 157.68 percent. *Second Sunset Review*, 80 Fed. Reg. at 53281.

<sup>78</sup> *Original Determination*, USITC Pub. 3711, at 17.

primarily in the large declines in many of the industry indicators other than its operating margins.<sup>79</sup>

## 2. First Five-Year Review

In the first five-year review, the Commission found the domestic industry's performance was inconsistent from 2004 to 2008, before improving substantially in 2009. The domestic industry's financial performance fluctuated greatly from 2004 to 2007, with a marked decline in 2008 that reflected significant increases in raw material costs, particularly in cold-rolled steel sheet. The industry's financial performance improved in 2009, despite no significant increase in net sales, due to a decrease in its steel costs. Based on the mixed data, the Commission did not find that the domestic industry was in a vulnerable state.<sup>80</sup>

The Commission concluded that revocation of the order would likely lead to a significant increase in subject imports that likely would undersell the domestic like product and significantly suppress or depress U.S. prices. It found that the domestic industry sold the vast majority of ironing tables in the U.S. market to a limited number of large retailers at the wholesale level and that the loss of one of these large purchasers to subject imports would have a substantial impact on the domestic industry's condition.<sup>81</sup>

The Commission also considered the role of other factors, including nonsubject imports and changes in demand, that might affect the domestic industry in the reasonably foreseeable future. Nonsubject imports had only a minimal share of the market and that share fell every year after 2005. Thus, the Commission found that nonsubject imports were not likely to prevent a substantial increase in the volume of subject imports after revocation. The Commission examined demand, which would likely be flat at best, and stated that this made the industry more susceptible to injury by the likely volume and price effects of subject imports. The 2009 improvement in the domestic industry's financial performance was largely due to the decrease in raw material costs that was not likely to recur in the reasonably foreseeable future.<sup>82</sup>

Consequently, the Commission found that the likely volume and price effects of the subject imports would likely have a significant impact on the production, shipments, sales, market share, and revenues of the domestic industry. It found that declines in these indicators of industry performance would have had a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and to make and maintain capital investments. Therefore, it concluded that, if the antidumping duty order were revoked, subject imports from China would likely have a significant impact on the domestic industry within a reasonably foreseeable time.<sup>83</sup>

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<sup>79</sup> *Original Determination*, USITC Pub. 3711, at 18.

<sup>80</sup> *First Five-Year Review*, USITC Pub. 4155, at 18-19.

<sup>81</sup> *First Five-Year Review*, USITC Pub. 4155, at 19.

<sup>82</sup> *First Five-Year Review*, USITC Pub. 4155, at 19-20.

<sup>83</sup> *First Five-Year Review*, USITC Pub. 4155, at 20.



### 3. Current Review

There is only limited information on the record of this expedited review concerning the performance of the domestic industry since the first review. This information pertains only to certain economic factors and is available only for 2014.<sup>84</sup> The limited evidence in this expedited review is insufficient for us to make a finding whether the domestic industry producing ironing tables is vulnerable to the continuation or recurrence of material injury in the event of revocation of the antidumping duty order.<sup>85</sup>

The capacity of HPI, the sole domestic producer, was the same in 2014 as 2009 (the latest year for which the Commission obtained information in the first review), while its production, capacity utilization and shipments were \*\*\*.<sup>86</sup> HPI's average unit value of U.S. shipments was \*\*\* in 2014 than in 2009.<sup>87</sup> Its COGS was higher in 2014 than in 2009, although its ratio of COGS to net sales was lower.<sup>88</sup> HPI's operating income was \*\*\* in 2014 compared to 2009.<sup>89</sup>

Based on the information available in this review, we find that should the order be revoked the likely significant volume and price effects of subject imports would likely have a significant impact on the domestic industry. Specifically, the domestic industry would likely lose market share to subject imports, which would adversely impact its production, shipments, employment levels, sales, and revenue. The domestic industry would also face price depression or suppression. These effects would likely have a direct adverse impact on the industry's profitability, and its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than the subject imports, including the presence of nonsubject imports, so as not to attribute likely injury from other factors to the subject imports. As previously stated, official import statistics indicate a substantial quantity of imports from other sources over the POR, although it is not clear whether these imports are of

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<sup>84</sup> CR/PR at Table I-3.

<sup>85</sup> Vice Chairman Pinkert finds based on the limited data on this expedited record that the domestic industry producing ironing tables does not appear to be vulnerable. He bases this finding on the industry's higher unit values in 2014 than in 2009, its operating margin of \*\*\* percent in 2014, which was higher than in 2009, and its market share in 2014 (which was close to its peak since the issuance of the order). CR/PR at Tables I-3, I-6, and C-1.

<sup>86</sup> CR/PR at Table I-3. HPI's capacity was \*\*\* units in both 2009 and 2014. Its capacity utilization was \*\*\* percent in 2014 compared to \*\*\* percent in 2009, and its shipments, by quantity, were \*\*\* units in 2014 compared to \*\*\* units in 2009. *Id.*

<sup>87</sup> The average unit value of HPI's shipments was \$\*\*\* per unit in 2014 compared to \$\*\*\* per unit in 2009. CR/PR at Table I-3.

<sup>88</sup> HPI's COGS was \$\*\*\* in 2014 compared to \$\*\*\* in 2009. CR/PR at Table I-3. The domestic industry's ratio of COGS to net sales was \*\*\* percent in 2014 compared to \*\*\* percent in 2009. *Id.*

<sup>89</sup> HPI's operating income was \$\*\*\* in 2014 compared to \$\*\*\* in 2009. CR/PR at Table I-3. Its operating income to net sales ratio was \*\*\* percent in 2014 compared to \*\*\* percent in 2009. *Id.*

ironing tables and parts thereof or out-of-scope products.<sup>90</sup> Even assuming *arguendo* that the imports from nonsubject sources in the official import statistics are of subject ironing tables and parts thereof, their presence did not preclude the domestic industry from achieving in 2014 a market share close to its historic peak for the period since the issuance of the order, increased average unit values, and strong financial performance.<sup>91</sup> We accordingly conclude that the likely adverse effects of revocation that we have identified are not attributable to nonsubject imports.<sup>92</sup>

Accordingly, we conclude that, if the antidumping duty order on ironing tables from China were revoked, subject imports from China would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

#### **IV. Conclusion**

For the foregoing reasons, we determine that revocation of the antidumping duty order on ironing tables from China would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

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<sup>90</sup> CR/PR at Table I-4.

<sup>91</sup> CR/PR at Tables I-3, I-6, and C-1.

<sup>92</sup> Similarly, generally flat demand for ironing tables since the first review, which HPI states is likely to continue in the reasonably foreseeable future, did not prevent the domestic industry from maintaining market share, unit values, and profitability.

# INFORMATION OBTAINED IN THE REVIEW

## BACKGROUND

On May 1, 2015, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),<sup>1</sup> that it had instituted a review to determine whether revocation of an antidumping order on ironing tables and certain parts thereof (“ironing tables”) from China would likely lead to the continuation or recurrence of material injury to a domestic industry.<sup>2</sup> All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.<sup>3 4</sup> The following tabulation presents information relating to the background and schedule of this proceeding:

Effective or statutory date	Action
May 1, 2015	Notice of institution and initiation by Commerce and Commission
August 4, 2015	Commission vote on adequacy
August 31, 2015	Commerce results of its expedited review
September 28, 2015	Commission statutory deadline to complete expedited review
April 25, 2016	Commission statutory deadline to complete full review

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<sup>1</sup> 19 U.S.C. 1675(c).

<sup>2</sup> *Ironing Tables and Certain Parts Thereof From China; Institution of a Five-Year Review*, 80 FR 24968, May 1, 2015. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of a five-year review of the subject antidumping duty order concurrently with the Commission’s notice of institution. *Initiation of Five-Year (“Sunset”) Review*, 80 FR 24900, May 1, 2015. All pertinent *Federal Register* notices are referenced in app. A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> As part of their response to the notice of institution, interested parties were requested to provide company-specific information. That information is presented in app. B. Summary data compiled in prior proceedings are presented in app. C.

<sup>4</sup> Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the subject merchandise. The following five individual firms were named as the largest purchasers of ironing tables: \*\*\*. Purchaser questionnaires were sent to the firms identified. The responses received from four purchasers (\*\*\*) are presented in app. D.

## RESPONSES TO THE COMMISSION’S NOTICE OF INSTITUTION

### Individual responses

The Commission received one submission in response to its notice of institution filed by U.S. producer Home Products International (“HPI” or the “domestic interested party”).

A complete response to the Commission’s notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy and explain any deficiencies in their responses. A summary of the number of responses and estimates of coverage for each is shown in table I-1. The Commission did not receive any responses from Chinese producers or importers of the subject merchandise from China.

**Table I-1**

**Ironing tables: Summary of responses to the Commission’s notice of institution**

Type of interested party	Completed responses	
	Number	Coverage
Domestic producer	1	*** <sup>1</sup>
Respondents	0	0%

<sup>1</sup>The coverage figure represents the domestic interested party’s estimate of its share of total U.S. production of ironing tables.

Source: HPI’s Response to the Notice of Institution, May 27, 2015, p. 4.

### Party comments on adequacy

The Commission received a submission from HPI commenting on the adequacy of its response to the notice of institution and whether the Commission should conduct an expedited or full review. HPI noted that it submitted all of the information requested by the Commission in a complete, thorough, and adequate response, which accounted for the entire domestic industry in this five-year review. HPI further noted that foreign manufacturers or exporters failed to respond to the Commission’s notice of institution, resulting in an inadequate response on behalf of the respondent parties.<sup>5</sup> HPI also argued that “given the adequacy of the response submitted by HPI, the inadequacy of respondent interested parties’ response, and the absence of any valid reason for conducting a full review, the Commission should conduct an expedited review.”<sup>6</sup>

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<sup>5</sup> HPI’s Comments on Adequacy, July 13, 2015, p. 1.

<sup>6</sup> Ibid.

## RECENT DEVELOPMENTS IN THE INDUSTRY

Since the Commission's last five-year review, the following developments have occurred in the industry:

- 1.) Higher steel prices affected total production costs since steel is the primary raw material used in ironing tables.
- 2.) Demand conditions have remained relatively stable after declining in 2009. This decline was due to slow economic recovery, technological advancements resulting in more "no-iron" fabrics, and less interest in ironing from younger generations. Overall, HPI expects demand to remain flat or only decrease slightly since major life events such as college attendance and marriage may offset these negative factors.<sup>7</sup>
- 3.) The domestic interested party also noted that there was a "dramatic reduction in Chinese imports over the last five years" as a result of the antidumping duty deposit rates that were "at least 70 percent, and in some case, over 100 percent."<sup>8</sup>
- 4.) China had at least a 40 percent share of the European Union ("EU") ironing board market, which fell to 15 to 20 percent after the antidumping duties were imposed in 2011. The EU market for ironing boards was approximately \$132 million in 2013 when the EU extended its antidumping duties on ironing boards (whether or not they are free-standing) from China to over 42 percent.<sup>9</sup>

## THE PRODUCT

### Commerce's scope

Commerce has defined the subject merchandise as:

(F)loor-standing, metal-top ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. The subject tables are designed and used principally for the hand ironing or pressing of garments or other articles of fabric. The subject tables have full-height leg assemblies that support the ironing surface at an appropriate (often adjustable) height above the floor. The subject tables are produced in a variety of leg finishes, such as painted, plated, or matte, and they are available with various features, including iron rests, linen racks, and others. The subject ironing tables

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<sup>7</sup> HPI's Response to the Notice of Institution, May 27, 2015, pp. 34-35.

<sup>8</sup> Ibid., pp. 7-8.

<sup>9</sup> Philip Blenkinsop, "EU extends duties in Chinese imports of ironing boards," *Reuters*, July 23, 2013.

may be sold with or without a pad and/or cover. All types and configurations of floor-standing, metal-top ironing tables are covered by this order.

Furthermore, the order specifically covers imports of ironing tables, assembled or unassembled, complete or incomplete, and certain parts thereof. For purposes of this order, the term “unassembled” ironing table means a product requiring the attachment of the leg assembly to the top or the attachment of an included feature such as an iron rest or linen rack. The term “complete” ironing table means a product sold as a ready-to-use ensemble consisting of the metal-top table and a pad and cover, with or without additional features, *e.g.*, iron rest or linen rack. The term “incomplete” ironing table means product shipped or sold as a “bare board” – *i.e.*, a metal-top table only, without the pad and cover – with or without additional features, *e.g.* iron rest or linen rack. The major parts or components of ironing tables that are intended to be covered by the order under the term “certain parts thereof” consist of the metal top component (with or without assembled supports and slides) and/or the leg components, whether or not attached together as a leg assembly. The order covers separately shipped metal top components and leg components, without regard to whether the respective quantities would yield an exact quantity of assembled ironing tables.

Ironing tables without legs (such as models that mount on walls or over doors) are not floor-standing and are specifically excluded. Additionally, tabletop or countertop models with short legs that do not exceed 12 inches in length (and which may or may not collapse or retract) are specifically excluded.<sup>10</sup>

#### **Description and uses<sup>11</sup>**

The term “ironing tables” is used to distinguish the subject floor-standing metal top product from “ironing boards,” which are excluded from the scope. Ironing boards can be placed on a countertop, tabletop, over-the-door, or be wall-mounted, whereas the subject ironing tables are floor-standing. Ironing tables are used in households, hotel rooms, and workplaces for the purpose of pressing apparel and other textile items. The standard size of ironing tables is 48 to 54 inches in length and 13 to 18 inches in width. Ironing tables may also have special features such as an iron rest or linen racks.

The principal components of an ironing table are its metal ironing surface, legs, feet, slide bar, handle, hangers, ribs, and foot cover. The surface of ironing tables is either covered

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<sup>10</sup> *Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof from the People’s Republic of China: Continuation of the Antidumping Duty Order*, 75 FR 36629, June 28, 2010.

<sup>11</sup> Unless otherwise noted, the information in this section is based on *Ironing Table and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, pp. I-3 – I-6; *Ironing Table and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, USITC Publication 4155, July 2010, pp. I-8 – I-10.

with a mesh top or perforated top that consists of heat-safe padding. More expensive ironing boards may have mesh tables that expand to accommodate larger goods to be ironed. Ironing tables are sold either in a T-leg or 4-leg stand configuration (figure I-1). The legs are generally lightweight and tubular with padded feet to prevent damage to floors. The 4-leg ironing table is generally considered superior to the T-leg because it offers more stability. Typically, T-leg ironing tables are offered at a lower price point, while 4-leg ironing tables are usually offered on higher-end models. A T-leg ironing table is made of a single metal tube inserted into a metal leg base that is shaped as an inverted “T.” A 4-leg ironing table has two legs, each made up of two metal tubes that run parallel to each other, flare out to form a 4-footed base on the floor, and typically have a cross brace at or near the flare or at the end of the tubes. In both types of stands, users press a lever that allows the legs to drop down and subsequently raise the height of the table, or the legs can collapse to fold flat for storage.

**Figure I-1**

**Ironing tables: Examples of ironing tables with a T-leg (left) and a 4-leg (right)**



Source: Home Products International website, [www.homzproducts.com](http://www.homzproducts.com)

Ironing tables are sold in as many as five different retail price point categories, including: 1) Value (opening price point and perforated or mesh top with a T-leg); 2) Good (mostly mesh-top and 4-legs with an optional iron rest); 3) Better (heavy duty mesh-top and heavy duty 4-legs with an added feature such as an iron rest); 4) Best (mesh wide-top with heavy duty professional 4-legs and multiple added features such as an iron rest and a linen rack); and 5) Elite (typically wide tops with an extension cord, wheels, and/or other combinations of accessories and special finishes). More expensive designer-based ironing tables are manufactured by European producers, and may be up to five times more expensive than ordinary collapsible ironing tables made in the United States.<sup>12</sup>

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<sup>12</sup> Ironing Board, *How Products Are Made*, Volume 7, [www.madehow.com](http://www.madehow.com), retrieved on June 10, 2015.

## Manufacturing Process

The production of ironing tables involves common capital equipment such as a metal roll-former, punch press, welding equipment, and painting facilities. The metal top can be formed by various processes, including pressing, stamping, and punching. Alternatively, much of the production process may be accomplished by hand, with tools such as hand benders and welders, wire cutters, metal shears, and a sewing machine for covers. The production process in the United States is purportedly more capital intensive and automated than the production process in China.

Ironing tables are primarily produced from cold-rolled flat steel coils, which are long sheets of rolled steel that begin the forming process. The width of the cold-rolled flat steel coils can range from 0.75 inch to over 28 inches wide depending on which part of the ironing table is under production.<sup>13</sup> The wider sizes of the cold-rolled flat steel coils are used to produce the top of the ironing table, while the narrower sizes are used to manufacture the legs, feet, hangers, and ribs.

The cold-rolled flat steel coils are fed into a de-coiler that flattens the steel in order to create the top, which is usually 16 inches in width. In general, the metal top can be formed by various processes, including pressing, stamping, and punching. For a perforated top, flat-rolled steel is pressed in a series of sequential dies to form the top. For a mesh top, however, flat-rolled steel is processed through a metal expanding machine and is then cut into a top-shape by a die. The shaped steel mesh is inserted into a groove in the inner surface of the rim, and then the rim is crimped tightly over the mesh in an automated process.

Following the fabrication of the metal top, a set of tracks (hangers) are stamped on a punch press and welded to the underside of the metal ironing surface. The hangers run the full length of the tables. The vertical supports (ribs) are produced on a roll former and attached to the hangers. The lock assembly that secures the collapsible ironing board in place is composed of a spring and handle, and is attached to the hangers and ribs. The metal top, hangers, and ribs with the attached locking assembly are placed together by hand and fed into a top welder that welds the components together to the metal top. The product that comes out of the welder is then inspected to ensure that the pressure points are securely welded. After this process, the metal top with the assembled hangers, ribs, and locking mechanism awaits the painting process.<sup>14</sup>

In order to form the legs and feet of the ironing table, the cold-rolled flat steel is rolled into tubes by welding the ends of the flat steel together. A sharp carbide tool is scraped over the rough edge of the weld so that there are no metal burrs at the juncture of the seams. The tubes then undergo a cooling process before they are cut to the required size. The feet are attached to the legs by rivets, and the legs are now complete.<sup>15</sup>

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<sup>13</sup> Ibid (sourced from an oral interview with Joseph Deppen, Vice President of Manufacturing of Home Products International, October 2001).

<sup>14</sup> Ibid.

<sup>15</sup> Ibid.

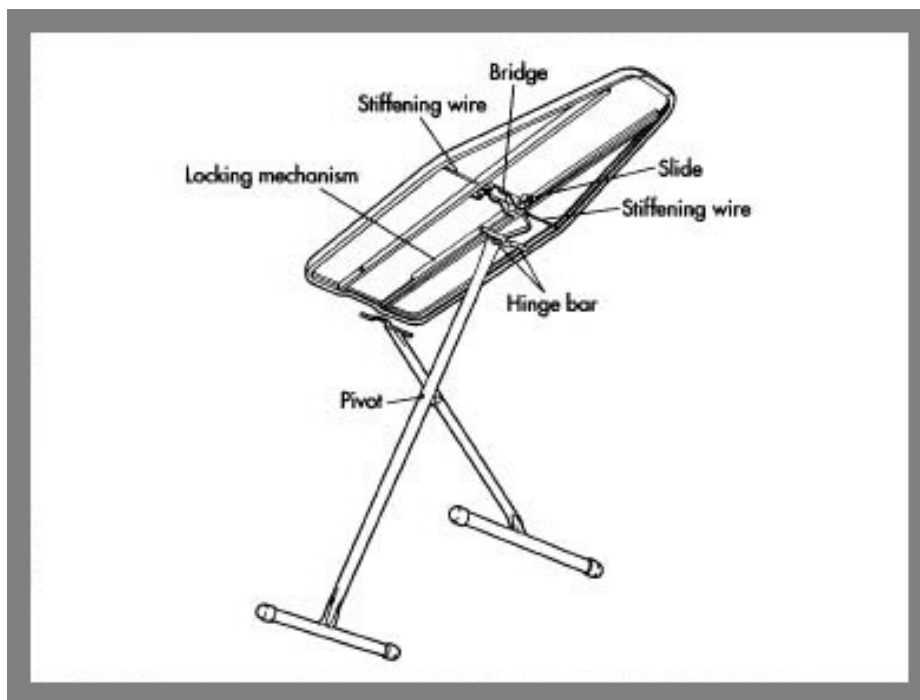


The tops, legs and feet are then sprayed with a degreaser, dried, and painted in either a wet (liquid) or powder process. In order for the top of the board to be attached to the legs, the legs are fed into a roller conveyor, and then slipped in the underside of the metal top and secured in place. The legs are connected to the hangers by a stamped piece of metal known as a hinge bar and are connected to the ribs with a slide bar (figure I-2). A height-adjusting handle made on a wire machine is then added to the ironing table, and rubber and plastic tips are added to the feet of the ironing board.<sup>16</sup>

The foam pad and fabric cover are attached to the ironing table in different ways based on the end-market use for the ironing table. For the household market, elastic is sewn on the outer edge of the textile fabric on site, and the elastic holds the cover over the foam and metal table top. For the hotel market, fabric covers are permanently affixed to the foam pads and table tops. Finally, the ironing table is shrink-wrapped and packed in a carton for shipment.<sup>17</sup>

**Figure I-2**

**Ironing tables: Parts of an ironing table**



Source: *How Products are Made*, Volume 7, [www.madehow.com/Volume7/Ironing-Board.html](http://www.madehow.com/Volume7/Ironing-Board.html)

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<sup>16</sup> Ibid.

<sup>17</sup> Ibid.

## U.S. tariff treatment

Prior to 2003, the subject ironing tables were originally imported with all other metal household furniture under statistical reporting number 9403.20.0010 of the Harmonized Tariff Schedule of the United States (“HTSUS”). Effective July 2003, imports of the subject ironing tables are properly reported under HTS statistical number 9403.20.0011. Effective 2011, the subject metal top and leg components are classified for tariff purposes as parts of ironing tables and are imported under HTS statistical reporting number 9403.90.8041.<sup>18</sup> Products imported from China under both subheadings 9403.20.00 and 9403.90.80 are dutiable at a column 1-general duty rate of “free.”

### The definition of the domestic like product

The domestic like product is defined as the domestically produced product or products, which are like, or in the absence of like, most similar in characteristics and uses with the subject merchandise. In its original determination, the Commission defined the domestic like product as floor-standing, metal-top ironing tables, coextensive with Commerce’s scope.<sup>19</sup>

In the original investigation, the Commission declined to expand the definition of the domestic like product to include over-the-door ironing boards (“ironing boards”), although it acknowledged that ironing tables and ironing boards overlap in terms of physical characteristics and uses, manufacturing facilities and production employees, channels of distribution, and price. Regarding physical characteristics and uses, ironing tables and ironing boards both provide a surface area for pressing clothing and other items. However, ironing tables have legs while ironing boards have a metal ironing surface that is attached to a door. They also have differences regarding storage positions, size, and versatility.<sup>20</sup>

Ironing boards are manufactured exclusively in the United States in the same facility, and with the same employees as ironing tables. However, different die and fabrication equipment is required for ironing boards due to their unique dimensions.<sup>21</sup>

With regard to interchangeability and customer and producer perceptions, the majority of purchasers believed that ironing boards were not interchangeable with ironing tables in the original investigation. However, one purchaser believed that its customers considered ironing boards to be interchangeable with ironing tables, and four purchasers were unaware of their customers’ perceptions as to whether ironing boards are interchangeable with ironing tables.

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<sup>18</sup> Prior to 2011, the subject metal top and leg components were imported under the HTS statistical reporting number 9403.90.8040.

<sup>19</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, p. 7.

<sup>20</sup> *Ibid.*, p. 6.

<sup>21</sup> *Ibid.*, pp. 6-7.

Additionally, the two domestic producers during the original investigation disagreed as to whether they are interchangeable.<sup>22</sup>

Ironing tables are sold to mass retail stores and distributors servicing the hospitality/hotel market, while ironing boards are sold in mass-market channels. Furthermore, the price of ironing boards was slightly higher than the price of ironing tables in 2003.<sup>23</sup>

Given that there are substantial differences with respect to physical characteristics and uses, interchangeability, customer and producer perceptions, and price, the Commission declined to include ironing boards in the definition of the domestic like product.<sup>24</sup>

In the first review, the Commission determined that the definition of the domestic like product was ironing tables and certain parts thereof, which was the same as Commerce's scope and unchanged from the Commission's original determination.<sup>25</sup>

In its notice of institution for this current review, the Commission solicited comments from interested parties regarding the appropriate domestic like product. According to its response to the notice of institution, the domestic producer agrees with the domestic like product as stated in the Commission's original determination.<sup>26</sup>

## THE ORIGINAL INVESTIGATION AND SUBSEQUENT REVIEWS

### The original investigation

The original investigation resulted from a petition filed on June 30, 2003 with Commerce and the Commission by Home Products International, Chicago, Illinois. On June 24, 2004, Commerce determined that imports of ironing tables from China were being sold at less than fair value ("LTFV"). The Commission determined on July 29, 2004 that a domestic industry was materially injured by reason of LTFV imports of ironing tables from China.<sup>27</sup> On August 6, 2004, Commerce amended its final determination after HPI filed allegations that Commerce had made ministerial errors in its final determination.<sup>28</sup> The revised final weighted-average dumping margins are shown in table I-2. Data compiled during the original investigation and subsequent five-year review are presented in appendix C.

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<sup>22</sup> Ibid., p. 7.

<sup>23</sup> Ibid.

<sup>24</sup> Ibid. The Commission also declined to expand the definition of the domestic like product to include: 1) wall-mounted ironing boards, which are produced at different manufacturing facilities with different employees, and 2) counter-top ironing boards, which are not produced domestically. Ibid., p. 6, n.23 and p. 7, n. 34.

<sup>25</sup> *Ironing Tables and Certain Parts Thereof from China*, Investigation No. 731-TA-1047 (Review), USITC Publication 4155, June 2010, p. 5.

<sup>26</sup> *HPI's Response to the Notice of Institution*, May 27, 2015, p. 35.

<sup>27</sup> *Ironing Tables and Certain Parts Thereof from China*, 69 FR 47177, August 4, 2004.

<sup>28</sup> *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof From the People's Republic of China*, 69 FR 47868, August 6, 2004.

### **The first five-year review**

In June 2010, the Commission completed its first full five-year review of the antidumping duty order on ironing tables from China and determined that revocation of the order on ironing tables from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>29</sup> Following affirmative determinations in the five-year review by Commerce and the Commission, effective June 28, 2010, Commerce issued a continuation of the antidumping duty order on imports of ironing tables from China.<sup>30</sup>

### **Prior related investigations**

The subject product has not been the subject of any antidumping or countervailing duty investigations in the United States prior to HPI's petition. In addition, the Commission has not conducted any related investigations concerning ironing tables since the original investigation.

### **ACTIONS AT COMMERCE**

Commerce has not made any duty absorption findings, anti-circumvention findings, or initiated new shipper reviews since the imposition of the antidumping duty order. In addition, there have been no scope inquiry reviews or changed circumstances reviews since the imposition of the antidumping order.

### **Five-year review results**

Table I-2 presents the dumping margins calculated by Commerce in its original investigations and first five-year review.

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<sup>29</sup> *Ironing Tables and Certain Parts Thereof From China; Determination*, 75 FR 33636, June 14 2010.

<sup>30</sup> *Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof from the People's Republic of China: Continuation of the Antidumping Duty Order*, 75 FR 36629, June 28, 2010.

**Table I-2**

**Ironing tables: Commerce's original and first five-year review dumping margins for producers/exporters**

<b>Producer/exporter</b>	<b>Original margin (percent)</b>	<b>First five-year review margin (percent)</b>
Since Hardware (Guangzhou) Co., Ltd.	9.47	9.47
Shunde Yongjian Housewares Co., Ltd.	157.68	157.68
Forever Holdings Ltd.	72.29	72.29
Gaoming Lihe Daily Necessities Co., Ltd.	72.29	72.29
Harvest International Housewares Ltd.	72.29	72.29
Foshan Shunde	( <sup>1</sup> )	157.68
All others	157.68	157.68

<sup>1</sup> Foshan Shunde was not listed separately in the original antidumping duty order.

*Source: Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof From the People's Republic of China, 69 FR 47868, August 6, 2004; Floor-Standing Metal-Top Ironing Tables and Parts Thereof from the People's Republic of China: Final Results of Expedited Five-year (Sunset) Review of Antidumping Duty Order, 74 FR 56794, November 3, 2009.*

Commerce notified the Commission that it had not received adequate responses from respondent interested parties to its notice initiating the second five-year review of the antidumping duty finding on imports of ironing tables from China. As a result, Commerce intends to conduct an expedited review of the finding and to issue its final result by August 31, 2015.

**THE INDUSTRY IN THE UNITED STATES**

**U.S. producers**

During the original investigation, two firms, HPI and Whitney Design, Inc. ("Whitney") provided the Commission with information on their U.S. operations with respect to ironing tables. These firms accounted for all U.S. production of ironing tables during January 2001 - March 2004. In the first five-year review, the Commission issued producers' questionnaires to these two firms, one of which, HPI, provided the Commission with information on its ironing tables operations. Whitney ceased ironing table operations in April 2002 during the original

investigation and has not since produced ironing tables.<sup>31</sup> In response to the Commission's notice of institution in this current second five-year review, HPI identified itself as the single domestic producer of the domestic like product.<sup>32</sup>

### **Definition of the domestic industry and related parties issues**

The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. In its original determination and its first five-year review determination, the Commission defined the domestic industry as consisting of all domestic producers of ironing tables.<sup>33</sup> In the current second five-year review, HPI agrees with the Commission's definition of the domestic industry as stated in the Commission's original determination.<sup>34</sup>

With regard to related party issues in the original investigation, both HPI and Whitney imported the subject merchandise throughout the period of investigation. The Commission determined, however, that appropriate circumstances did not exist to exclude either producer from the domestic industry as a related party.<sup>35</sup> In the first five-year review, HPI also imported the subject merchandise but the Commission again determined that appropriate circumstances did not exist to exclude HPI from the domestic industry as a related party.<sup>36</sup> In this current five-year review, HPI did not identify any related parties.<sup>37</sup>

### **U.S. producers' trade and financial data**

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution of the current five-year review.<sup>38</sup> Table I-3 presents a compilation of the data submitted from the responding U.S. producer in this current second

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<sup>31</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, USITC Publication 4155, June 2010, p. I-11.

<sup>32</sup> *HPI's Response to the Notice of Institution*, May 27, 2015, pp. 4, 26.

<sup>33</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, USITC Publication 4155, June 2010, p. 6.

<sup>34</sup> *HPI's Response to the Notice of Institution*, May 27, 2015, p. 35.

<sup>35</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, p. 9.

<sup>36</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, USITC Publication 4155, June 2010, p. 6.

<sup>37</sup> HPI noted that \*\*\*. Email from \*\*\*, June 29, 2015.

<sup>38</sup> Individual company trade and financial data are presented in app. B. Summary data compiled in prior proceedings are presented in app. C.

five-year review as well as trade and financial data submitted by U.S. producers in the previous first five-year review and the original investigation.<sup>39</sup>

**Table I-3**

**Ironing tables: Trade and financial data submitted by U.S. producers, 2003, 2009, and 2014**

\* \* \* \* \*

## **U.S. IMPORTS AND APPARENT CONSUMPTION**

### **U.S. importers**

In the original investigation, 11 U.S. importers provided the Commission with usable information on their import operations, accounting for approximately 90.0 percent of ironing table imports in 2003, which included responses from U.S. producers HPI and Whitney.<sup>40</sup> In the first five-year review, the Commission issued questionnaires to 33 firms and received 10 usable responses. Seven of these 10 firms provided usable responses in the original investigation, which accounted for \*\*\* percent of reported imports in 2003.<sup>41</sup>

In its response to the Commission's notice of institution in this current five-year review, HPI provided a list of eight U.S. importers that may be importing or have imported ironing tables from China.<sup>42</sup>

### **U.S. imports**

In its original investigation, the Commission found that the volume of subject imports and the increase in that volume were significant, both in absolute terms and relative to consumption and production in the United States. The Commission noted that U.S. imports of ironing tables from China "nearly quadrupled in terms of quantity and nearly tripled in terms of value between 2001 and 2003" but declined in January-March 2004 as compared to January-March 2003, which the Commission attributed to the filing of the petition in 2003 and the imposition of provisional duties in February 2004. Subject imports market share also increased

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<sup>39</sup> HPI noted that most sales of "domestic ironing tables at the wholesale level are to large retailers who exert significant market power" such as [American Hotel Register, Bed Bath & Beyond, Kmart – Sears Holding, Target Corporation, and Wal-Mart]. In addition, the majority of domestic ironing tables are sold as private label brands. According to HPI, these large retailers can "easily change the manufacturer of their ironing tables, with little or no impact on consumer awareness and consumer behavior." *HPI's Response to the Notice of Institution*, May 27, 2015, pp. 20-21, 30-31.

<sup>40</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, p. IV-1.

<sup>41</sup> *Ironing Tables and Certain Parts Thereof From China, Investigation No. 731-TA-1047 (Review)*, Staff Report, INV-HH-047, May 7, 2010, p. I-21.

<sup>42</sup> *HPI's Response to the Notice of Institution*, May 27, 2015, pp. 27-28.

by approximately \*\*\* percentage points in terms of quantity and value between 2001 and 2003.<sup>43</sup>

In its first five-year review, the Commission also determined that the likely volume of subject imports, both in absolute terms and relative to production and consumption in the United States, would be significant if the order were revoked. The Commission found that substantial volumes of the subject imports were present over the period examined even with the order in place. Subject imports were \*\*\* units in 2004-09, respectively. In addition, market share of subject imports was \*\*\* percent in 2004-09, respectively. The Commission also recognized that the Chinese producers have considerable production capacity and unused capacity since the reported production capacity in 2009 was \*\*\* apparent U.S. consumption for that year. Furthermore, the United States remained a significant market for Chinese exports over the period of review, particularly after the EU imposed antidumping duties on ironing tables in April 2007.<sup>44</sup>

In its response to the Commission's notice of institution in this current five-year review, HPI noted that if the antidumping duty order is revoked, "the industry is vulnerable to a surge of dumped imports {...and} an increased volume of imports." During the first five-year review, the Commission found that subject imports were likely to cause material injury if the antidumping duty order were revoked. HPI believes that "nothing has changed to alter that judgment" since the Chinese has numerous producers and substantial capacity, faces an antidumping duty order in the EU, and continues to export to Canada despite existing duties.<sup>45</sup>

Table I-4 presents the quantity and value for imports from China as well as the other top sources of U.S. imports (shown in descending order of 2014 imports by quantity) during the period of the current five-year review.<sup>46</sup> The overall quantity of U.S. imports of ironing tables increased by 55.8 percent from 2010 to 2012 and decreased by 46.1 percent from 2012 to 2014. The overall value of U.S. imports of ironing tables increased by 73.3 percent from 2010 to 2011, and decreased by 38.2 percent from 2011 to 2014. The quantity of U.S. imports of ironing tables from China peaked in 2012, decreased by 62.3 percent in 2013, and increased by 8.9 percent in 2014. The value of U.S. imports of ironing tables from China peaked in 2011, decreased by 59.6 percent from 2011 to 2013, and increased by 25.2 percent in 2014.

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<sup>43</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, Views of the Commission, July 2004, pp. 17-18.

<sup>44</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, Views of the Commission, June 2010, pp. 18-20.

<sup>45</sup> *HPI's Response to the Notice of Institution*, May 20, 2015, pp. 19, 21.

<sup>46</sup> Commission staff relied on importer questionnaire responses for estimates of subject imports during the original investigation and the first five-year review since staff believed that official import statistics overstated the quantity of imports of the subject merchandise, which caused discrepancies. Staff relied on official import statistics during the current five-year review because importer data from questionnaires are not available in this adequacy phase investigation. *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, p. IV-1; *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, Views of the Commission, June 2010, p. 4, n.6.



**Table I-4**  
**Ironing tables: U.S. imports, 2010-14**

Item	2010	2011	2012	2013	2014
<b>Quantity (1,000 units)</b>					
China (subject)	652	809	1,068	403	439
Ukraine	0	0	0	26	66
Turkey	3	10	36	24	57
Hong Kong	18	4	33	38	51
Mexico	56	70	58	53	49
France	13	20	83	21	48
Italy	8	21	17	160	36
India	187	286	185	94	32
Germany	0	1	0	1	11
Latvia	5	6	12	11	11
All other imports (nonsubject)	85	129	105	128	61
Total imports	1,025	1,356	1,597	959	861
<b>Landed, duty-paid value (1,000 dollars)</b>					
China (subject)	5,204	9,527	8,844	3,853	4,823
Ukraine	0	0	0	512	1,344
Turkey	22	140	557	309	701
Hong Kong	179	76	398	362	1,057
Mexico	1,116	1,454	953	764	696
France	215	319	1,065	323	698
Italy	418	820	735	2,520	753
India	2,433	4,778	2,443	1,231	355
Germany	36	50	24	23	184
Latvia	163	202	295	364	359
All other imports (nonsubject)	1,497	2,190	1,936	2,093	1,120
Total imports	11,283	19,556	17,253	12,354	12,090

Note.—Due to rounding, figures may not add to total shown.

Note.—The subject metal top and leg components are imported under HTS statistical number 9403.90.8041. In the Commission's first five-year review, however, no responding company reported imports of ironing table components. Customs import data also indicated that antidumping duties had not been paid on ironing table components by any of the known importers of ironing tables during the period of review. Furthermore, HTS statistical number 9403.90.8041 includes many metal components in addition to metal top and leg components of ironing tables, which would cause the import data to be largely overstated. Therefore, the U.S. import data in 2010-14 may be slightly understated to the extent that the subject metal top and leg components have been imported since the Commission's first five-year review. *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, USITC Publication 4415, June 2010, p. IV-1, n.3.

Source: Official Commerce statistics for HTS statistical reporting number 9403.20.0011.

## Apparent U.S. consumption and market shares

Based on limited information, the overall demand for ironing tables is likely to exhibit little change because households infrequently replace their long-lasting ironing tables. According to *International Housewares Association*, for example, more than 90 percent of U.S. households own ironing boards, but fewer than three percent of U.S. households replaced these products in the past year. *International Housewares Association* also claims that a typical U.S. household changes their ironing tables every 30 years.<sup>47</sup>

Table I-5 presents data on U.S. producers' U.S. shipments, U.S. imports, and apparent U.S. consumption, while table I-6 presents data on U.S. market shares of U.S. apparent consumption. The quantity of U.S. apparent consumption has declined overall since the original investigation. The value of U.S. apparent consumption decreased in the first five-year review and increased in this current five-year review.<sup>48</sup> Since the data presented for 2003 and 2009 consist of reported shipments of imports of ironing tables while the data presented for 2014 consists of official import statistics, the apparent U.S. consumption data are not directly comparable.

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<sup>47</sup> *International Housewares Association*, Marketwatch, Vol. 3, No. 4, March 2004.

<sup>48</sup> Since HPI has reported a constant capacity of \*\*\* units since the original investigation, the quantity of apparent U.S. consumption is \*\*\* percent of HPI's capacity, indicating that HPI has enough capacity to meet demand.

**Table I-5****Ironing tables: U.S. producers' U.S. shipments, U.S. shipments of imports, and apparent U.S. consumption, 2003, 2009, and 2014**

Item	2003	2009	2014
<b>Quantity (1,000 units)</b>			
U.S. producers' U.S. shipments	***	***	***
U.S. shipments of imports from—			
China	***	***	439
Nonsubject countries	***	***	422
Total imports	***	***	861
Apparent U.S. consumption	***	***	***
<b>Value (1,000 dollars)</b>			
U.S. producers' U.S. shipments	***	***	***
U.S. shipments imports from—			
China	***	***	4,823
Nonsubject countries	***	***	7,267
Total imports	***	***	12,090
Apparent U.S. consumption	***	***	***

Note.—U.S. import data in 2003 and 2009 consist of shipments of imports of ironing tables reported in questionnaire responses submitted in the original investigation and the first five-year review. U.S. import data in 2014 are derived from official Commerce statistics (HTS 9403.20.0011) since data for U.S. shipments of imports are not available during the adequacy phase of the current second five-year review.

Source: For the year 2003, data are compiled using data submitted in the Commission's original investigation. For the year 2009, data are compiled using data submitted in the Commission's first five-year review. See *app. C*. For the year 2014, U.S. producers' U.S. shipments are compiled from the domestic interested party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS subheading 9403.20.0011.

**Table I-6****Ironing tables: Apparent U.S. consumption and U.S. market shares, 2003, 2009, and 2014**

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**PRICES AND RELATED INFORMATION**

In the current five-year review, HPI stated that it is not aware of any sources of information on national or regional prices other than individual market participants.<sup>49</sup> The average unit value of HPI's reported U.S. commercial shipments of subject ironing tables was

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<sup>49</sup> HPI's Response to the Notice of Institution, May 27, 2015, p. 31.

\$\*\*\* per unit in 2014.<sup>50</sup> The average unit value of U.S. commercial shipments of subject ironing tables reported by HPI was \$\*\*\* per unit in 2004-09, respectively, during the first five-year review, and was \$\*\*\* per unit in 2001-03, respectively, during the original investigation. In addition, the average unit value of U.S. shipments of imported subject ironing tables from China was \$\*\*\* per unit in 2004-09, respectively, during the first five-year review, and was \$\*\*\* per unit in 2001-03, respectively, during the original investigation.<sup>51</sup> According to import statistics, the average unit value of subject U.S. imports from China was \$10.99 per unit in 2014.<sup>52</sup>

HPI also stated that the large retail purchasers of ironing tables \*\*\*.<sup>53</sup> According to HPI, ironing tables usually require about nine pounds of steel, and raw material costs represented approximately \*\*\* percent of the total costs of goods sold during 2010-14. Therefore, the unit cost of goods sold increased as steel prices increased.<sup>54</sup>

## THE INDUSTRY IN CHINA

### Foreign producers

During the original investigation, the Commission sent questionnaires to 23 Chinese firms and received usable questionnaire responses from four Chinese companies: Forever Holdings, Ltd.; Foshan City Gaoming Lihe Daily Necessities Co., Ltd.; Harvest International Housewares Ltd.; and Shunde Yongjian Housewares Co., Ltd.<sup>55</sup> These four Chinese producers reported shipments of [4.2 million] ironing tables in 2003, of which [891,000] units were exported to the United States, which accounted for [27.7] percent of total Chinese exports and [21.1] percent of all shipments.<sup>56</sup>

In the Commission's full first five-year review, the Commission issued questionnaires to 31 Chinese firms and received usable questionnaire data from six companies: Forever Holdings, Ltd.; Foshan Shunde Yongjian Housewares & Hardware Co., Ltd.; Greenwood Houseware (Zhuhai) Ltd.; Harvest International Housewares; Heshan Zhishan Hengfeng Metal Co., Ltd.; and Since Hardware (Guangzhou) Co. Ltd.<sup>57</sup> Three of these companies, \*\*\*, reported exporting a total of \*\*\* ironing tables to the United States in 2009, accounting for approximately \*\*\*

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<sup>50</sup> Ibid.

<sup>51</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, Staff Report, INV-BB-087, July 2, 2004, app. C, table C-1; *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, Staff Report, INV-HH-047, May 7, 2010, app. C, table C-1.

<sup>52</sup> Official Commerce statistics for HTS statistical reporting number 9403.20.0011.

<sup>53</sup> *HPI's Response to the Notice of Institution*, May 27, 2015, p. 10.

<sup>54</sup> Ibid., p. 13. HPI noted that \*\*\*. Ibid., p. 13, n.7.

<sup>55</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, USITC Publication 3711, July 2004, p. VII-1.

<sup>56</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Final)*, Staff Report, INV-BB-087, July 2, 2004, table VII-1.

<sup>57</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, USITC Publication 4155, June 2010, p. IV-3.

percent of total Chinese exports and \*\*\* percent of total shipments.<sup>58</sup> Although the largest export market for these Chinese producers in 2004 was the United States, the largest export market during 2005-09 was the EU, accounting for \*\*\* percent of total Chinese exports and \*\*\* percent of all shipments in 2009.<sup>59</sup>

In its response to the Commission's notice of institution in the current second five-year review, HPI identified 23 producers of ironing tables in China.<sup>60</sup> HPI also noted that the number of Chinese ironing table manufacturers has grown since the original investigation as new firms surfaced in the first five-year review as well as in European antidumping proceedings and various websites. In addition, Chinese capacity has increased since Chinese firms can easily switch production between various metal products. HPI believes that "given the Chinese industry's ability to shift production readily from other products to ironing tables, the potential source of new supply or capacity is substantial."<sup>61</sup>

The Commission did not receive any responses to the notice of institution from producers or exporters of ironing tables in China in this current five-year review.

### **ANTIDUMPING OR COUNTERVAILING DUTY ORDERS IN THIRD-COUNTRY MARKETS**

On February 4, 2006, the EU initiated an antidumping duty proceeding concerning imports of ironing boards whether or not free-standing, with or without steam soaking and/or heating top and/or blowing top, including sleeve boards, and essential parts (i.e. the legs, top and iron rests) from China and Ukraine. On October 30, 2006, the EU imposed a provisional antidumping duty on these imports, and on April 23, 2007, it imposed a definitive duty. Antidumping duties ranged from 18.1 percent for Foshan Shunde to 36.5 percent for Guangzhou Power Team Houseware, and 38.1 percent for all other Chinese manufacturers, with the exception of Since Hardware (zero percent rate of duty). On October 2, 2009, the EU initiated an antidumping proceeding concerning imports of ironing boards originating from Chinese producer Since Hardware. In December 2009, as a result of a judgment by the Court of Justice of the European Communities that ruled on procedural grounds, the EU announced that imports of ironing boards from Chinese producer Foshan Shunde are no longer subject to the antidumping measures. On January 19, 2010, the EU amended the definitive antidumping duty on imports of ironing boards from China to reflect the results of a new exporter review imposing a definitive duty of 22.7 percent on imports of ironing boards from Chinese manufacturer Greenwood Houseware (Zhuhai). On September 13, 2010, the EU re-opened the antidumping investigation with regards to Foshan Shunde and imposed a definitive antidumping duty of 18.1 percent. On July 24, 2013, the EU maintained a final antidumping duty rate of 42.3 percent for all other Chinese manufacturers for another five years pursuant to

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<sup>58</sup> *Ironing Tables and Certain Parts Thereof from China, Investigation No. 731-TA-1047 (Review)*, Staff Report, INV-HH-047, May 7, 2010, p. IV-6

<sup>59</sup> *Ibid.*, table IV-3.

<sup>60</sup> *HPI's Response to the Notice of Institution*, May 27, 2010, pp. 28-30.

<sup>61</sup> *Ibid.*, pp. 24-25.

an expiry review, except for a number of companies with individual duty rates ranging from 18.1 percent to 39.6 percent.<sup>62</sup>

### THE GLOBAL MARKET

There is limited information available with respect to ironing tables as defined by Commerce's scope. Table I-7 presents Global Trade Atlas (GTA) export value data for HTS subheading 9403.20, defined as other metal furniture not elsewhere specified or indicated in the HTSUS ("other metal furniture products"), which is a broader category that encompasses ironing tables.<sup>63</sup> The largest suppliers of other metal furniture products to the global market are China, Germany, United States and Italy. According to GTA, global exports for other metal furniture products were approximately \$14.2 billion in 2014. China is the largest exporter of other metal furniture products globally, making up approximately 49 percent of the global exports in terms of value in 2014.

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<sup>62</sup> Various issues of the *Official Journal of the European Union*, April 26, 2007, L 109/12; October 2, 2009, C 237/5; December 18, 2009, C 308/44; January 28, 2010, L 24/1 and July 15, 2013 L198/1.

<sup>63</sup> 9403.20 includes finished products and does not include the subject metal top and leg components of ironing tables classified under HTSUS statistical reporting number 9403.90.8041

**Table I-7**

**Ironing tables: Value of global exports of other metal furniture not elsewhere specified or indicated, (HTS subheading 9403.20), 2010-2014**

Item	2010	2011	2012	2013	2014
<b>Value (1,000,000 dollars)</b>					
China	3,911	4,779	7,558	7,916	6,976
Germany	922	1,263	1,349	1,423	1,455
United States	676	755	868	869	925
Italy	533	603	550	575	602
Taiwan	350	402	434	405	479
Canada	336	341	361	334	365
Spain	193	248	256	245	243
Sweden	196	227	233	238	222
United Kingdom	147	197	217	235	274
Mexico	205	206	245	216	219
All other countries	1,942	2,196	2,177	2,326	2,475
Total exports	9,410	11,218	14,247	14,782	14,236

Source: *Global Trade Atlas*, retrieved on June 17, 2015.

Table I-8 presents quantities of Chinese ironing table exports. The data indicate that the three largest markets for Chinese exports in terms of quantity are the EU, followed by the United States and Japan.

**Table I-8**

**Ironing tables: Chinese exports of other metal furniture not elsewhere specified or indicated, (HTS subheading 9403.20), 2010-2014**

Item	2010	2011	2012	2013	2014
<b>Quantity (1,000 units)</b>					
United States	78,422	77,520	76,914	83,894	83,706
Japan	21,625	24,854	23,241	23,916	18,293
United Kingdom	15,446	16,762	17,188	16,974	16,772
Germany	12,707	11,832	11,302	11,885	12,882
Australia	8,339	8,714	9,325	9,717	10,765
Canada	8,159	7,536	7,803	7,963	7,868
Netherlands	6,678	7,301	6,362	6,124	7,491
France	7,222	6,693	7,394	6,326	7,417
Italy	5,664	5,744	4,613	4,497	5,363
Spain	6,807	6,367	4,357	4,131	5,361
All other countries	74,169	81,492	88,780	89,429	91,885
Total	245,239	254,815	257,280	264,855	267,802

Source: *Global Trade Atlas*, retrieved on June 17, 2015.

In addition, metal-top, floor standing ironing tables are specifically produced in several countries, most notably in China, India, Italy, Poland, Russia, Turkey, Ukraine, and the United Kingdom. Table I-9 provides a brief description of potential global producers of metal-top, floor standing ironing tables identified through staff research.



**Table I-9****Ironing tables: Companies identified as global producers of metal-top, floor standing ironing tables**

Company Name	Location	Type of Ironing Table Produced
Alok Chawla Enterprises	Faridabad, Haryana, India	Metal-top ironing tables with optional iron rests
Asha Hotel Supplies Private Ltd.	Chennai, Tamil Nadu, India	T-leg, metal-top ironing tables with optional iron rests
Casa and Kuchen	Gurgaon, Haryana, India	Metal ironing tables
Cipla Industries	New Delhi, Delhi, India	4-leg metal top ironing tables with optional iron rests
M.K. Traders	New Delhi, Delhi, India	4-leg ironing tables
Naad Enterprises	New Delhi, Delhi, India	4-leg metal ironing tables
Pull 'n' Dry	Bangalore, India	4 leg metal ironing tables with optional iron rests
RKS Engineering Industries	Chennai, Tamil Nadu, India	4-leg metal ironing table with optional iron rests
Savera Auto Comps Private Ltd.	Aurangabad, Maharashtra, India	4-leg and t-leg ironing table with optional iron rests
Soham International	Ludhiana, Punjab, India	4-leg metal ironing tables
Colombo New Scal SpA	Rovagnate, Italy	T-leg and 4-leg, metal-top ironing tables with optional iron rests
Rorets Polska Sp. Zoo	Pniewy, Poland	Metal ironing tables
Vest Ltd.	Izshevk, Udmurtskaya Respublika, Russia	4-leg metal ironing table with iron rests
Casaline İç Dış Ticaret	Konya, Turkey	T-leg and 4-leg, metal-top ironing tables with optional iron rests
Dogrular Madeni Eşya San. Tic. Ltd. Sti.	Konya, Turkey	T-leg and 4-leg, metal-top ironing tables
Eda Metal Madeni Eşya ve Mobilya San. Tic. Ltd. Şti.	Kayseri, Turkey	T-leg and 4-leg, metal-top ironing tables with optional iron rests
Evin Çelik Eşya Tel Çekme San Tic AS	Kayseri, Turkey	Metal ironing tables
Meric Pazarlama İc Ve Dis Tic. Ltd. STI	Istanbul, Turkey	T-leg metal-top ironing tables
Mil Metal-Plastik Turizm İnfaat Dis Ticaret San Ltd. STI	Kayseri, Turkey	4-leg, metal-top ironing tables
Milenyum Metal Dis Ticaret Ve Sanayi Lts. STI	Kayseri, Turkey	T-leg and 4-leg, metal-top ironing tables
SM Saraylı İC Dis Ticaret Petrol Urunleri San Ltd. STI	Konya, Turkey	T-leg and 4-leg, metal-top ironing tables with optional iron rests
Tamlas Oto Lastik Malzemeleri Sanayi	Kayseri, Turkey	T-leg metal-top ironing tables
YK Dis Ticaret Limited Sirket	Kayseri, Turkey	T-leg and 4-leg, metal-top ironing tables
Eurogold Industries	Zhytomyr, Ukraine	4-leg, metal-top ironing tables with optional iron rests
Vale Mill Rochdale Ltd.	Rochdale, Lancashire, England, United Kingdom	T-leg and 4-leg, metal-top ironing tables with optional iron rests

Source: Alibaba search for ironing tables, company websites, Indiamart.com, retrieved on June 22, 2015.



**APPENDIX A**

***FEDERAL REGISTER NOTICES***



The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://www.usitc.gov). In addition, the following tabulation presents, in chronological order, *Federal Register* notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
80 FR 24900 May 1, 2015	<i>Initiation of Five-Year ("Sunset") Review</i>	<a href="http://www.gpo.gov/fdsys/pkg/FR-2015-05-01/pdf/2015-10244.pdf">http://www.gpo.gov/fdsys/pkg/FR-2015-05-01/pdf/2015-10244.pdf</a>
80 FR 24968 May 1, 2015	<i>Ironing Tables and Certain Parts Thereof From China; Institution of a Five-Year Review</i>	<a href="http://www.gpo.gov/fdsys/pkg/FR-2015-05-01/pdf/2015-10105.pdf">http://www.gpo.gov/fdsys/pkg/FR-2015-05-01/pdf/2015-10105.pdf</a>



**APPENDIX A**

***FEDERAL REGISTER NOTICES***





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**APPENDIX B**  
**COMPANY-SPECIFIC DATA**



**RESPONSE CHECKLIST FOR U.S. PRODUCER**

Item	Home Products International, Inc.	
	Quantity=1,000 units; value=1,000 dollars;	
Nature of operation	✓	
Statement of intent to participate	✓	
Statement of likely effects of revoking the order	✓	
U.S. producer list	✓	
U.S. importer/foreign producer list	✓	
List of 3-5 leading purchasers	✓	
List of sources for national/regional prices	?	
<b>Production:</b>		
Quantity		***
Percent of total reported		***
Capacity		***
<b>Commercial shipments:</b>		
Quantity		***
Value		***
<b>Internal consumption:</b>		
Quantity		***
Value		***
Net sales		***
COGS		***
Gross profit or (loss)		***
SG&A expenses		***
Operating income or (loss)		***
Changes in supply/demand	✓	
<p>Note.—The production, capacity, and shipment data presented are for calendar year 2014. The financial data are for fiscal year ended December 31, 2014.</p> <p>✓ = response provided; ? = indicated that the information was not known.</p>		



**APPENDIX C**

**SUMMARY DATA COMPILED IN PRIOR INVESTIGATIONS**





**Table C-1**

**Ironing tables: Summary data concerning the U.S. market, 2001-03, January-March 2003, and January-March 2004**

\* \* \* \* \*

**Table I-1**

**Ironing tables: Comparative data from the original investigation and current review, 2001-03 and 2004-09**

\* \* \* \* \*

Table C-1  
Ironing tables: Summary data concerning the U.S. market, 2004-09

(Quantity=1,000 units, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per unit; period changes=percent, except where noted)

Item	Reported data							Period changes				
	2004	2005	2006	2007	2008	2009	2004-09	2004-05	2005-06	2006-07	2007-08	2008-09
U.S. consumption quantity:	***	***	***	***	***	***	***	***	***	***	***	***
Amount	***	***	***	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***	***	***	***
Importers' share (1):	***	***	***	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***	***	***	***
U.S. consumption value:	***	***	***	***	***	***	***	***	***	***	***	***
Amount	***	***	***	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***	***	***	***
Importers' share (1):	***	***	***	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***	***	***	***
U.S. shipments of imports from:												
China:												
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
All other sources:												
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
All sources:												
Quantity	1,641	1,925	1,741	1,116	1,553	755	-54.0	17.3	-9.5	-35.9	39.1	-51.4
Value	16,730	22,160	21,101	17,548	20,975	12,181	-27.2	32.5	-4.8	-16.8	19.5	-41.9
Unit value	\$10.20	\$11.51	\$12.12	\$15.72	\$13.51	\$16.14	58.3	12.9	5.3	29.7	-14.1	19.5
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
U.S. producers:	***	***	***	***	***	***	***	***	***	***	***	***
Average capacity quantity	***	***	***	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***	***	***	***
Capacity utilization (1)	***	***	***	***	***	***	***	***	***	***	***	***
U.S. shipments:	***	***	***	***	***	***	***	***	***	***	***	***
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Export shipments:	***	***	***	***	***	***	***	***	***	***	***	***
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***
Inventories/total shipments (1)	***	***	***	***	***	***	***	***	***	***	***	***
Production workers	***	***	***	***	***	***	***	***	***	***	***	***
Hours worked (1,000s)	***	***	***	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000s)	***	***	***	***	***	***	***	***	***	***	***	***
Hourly wages	***	***	***	***	***	***	***	***	***	***	***	***
Productivity (units per hour)	***	***	***	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***	***	***	***
Net sales:	***	***	***	***	***	***	***	***	***	***	***	***
Quantity	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	***	***	***	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***	***	***	***
COGS/sales (1)	***	***	***	***	***	***	***	***	***	***	***	***
Operating income or (loss)/ sales (1)	***	***	***	***	***	***	***	***	***	***	***	***

(1) "Reported data" are in percent and "period changes" are in percentage points.  
(2) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires.

**APPENDIX D**

**PURCHASER QUESTIONNAIRE RESPONSES**



As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties and it named the following five firms as the top purchasers of ironing tables: \*\*\*. Purchaser questionnaires were sent to these 5 firms and three firms (\*\*\*) provided responses which are presented below.

1. a.) Have any changes occurred in technology; production methods; or development efforts to produce ironing tables that affected the availability of ironing tables in the U.S. market or in the market for ironing tables in China since 2010?
- b.) Do you anticipate any changes in technology; production methods; or development efforts to produce ironing tables that will affect the availability of ironing tables in the U.S. market or in the market for ironing tables in China within a reasonably foreseeable time?

Purchaser	Changes that have occurred	Anticipated changes
***	No.	No.
***	No.	No.
***	Suppliers in China began to produce plastic top ironing tables to get around high duties associated with producing and shipping metal top boards to the US from China.	See response to 1A.
***	No.	No.

2. a.) Have any changes occurred in the ability to increase production of ironing tables (including the shift of production facilities used for other products and the use, cost, or availability of major inputs into production) that affected the availability of ironing tables in the U.S. market or in the market for ironing tables in China since 2010?
- b.) Do you anticipate any changes in the ability to increase production (including the shift of production facilities used for other products and the use, cost, or availability of major inputs into production) that will affect the availability of ironing tables in the U.S. market or in the market for ironing tables in China within a reasonably foreseeable time?

Purchaser	Changes that have occurred	Anticipated changes
***	No.	No.
***	No.	No.
***	No.	No.
***	No.	No.

3. a.) Have any changes occurred in factors related to the ability to shift supply of ironing tables among different national markets (including barriers to importation in foreign markets or changes in market demand abroad) that affected the availability of ironing tables in the U.S. market or in the market for ironing tables in China since 2010?

b.) Do you anticipate any changes in factors related to the ability to shift supply among different national markets (including barriers to importation in foreign markets or changes in market demand abroad) that will affect the availability of ironing tables in the U.S. market or in the market for ironing tables in China within a reasonably foreseeable time?

Purchaser	Changes that have occurred	Anticipated changes
***	No.	No.
***	No.	No.
***	No.	No.
***	No.	*** is aware of increased ironing board production beginning in Mexico. At this point, the quality of ironing boards produced in Mexico does not meet *** standards. Additionally, the Mexican producers are not able to meet the volume demands of a retailer of *** size at this point.

4. a.) Have there been any changes in the end uses and applications of ironing tables in the U.S. market or in the market for ironing tables in China since 2010?

b.) Do you anticipate any changes in the end uses and applications of ironing tables in the U.S. market or in the market for ironing tables in China within a reasonably foreseeable time?

Purchaser	Changes that have occurred	Anticipated changes
***	No.	No.
***	No.	No.
***	No.	No.
***	No.	No.

5. a.) Have there been any changes in the existence and availability of substitute products for ironing tables in the U.S. market or in the market for ironing tables in China since 2010?
- b.) Do you anticipate any changes in the existence and availability of substitute products for ironing tables in the U.S. market or in the market for ironing tables in China within a reasonably foreseeable time?

<b>Purchaser</b>	<b>Changes that have occurred</b>	<b>Anticipated changes</b>
***	Dry cleaning and fashion trends (wrinkle free garments and casual dress),	No.
***	No.	No.
***	No.	No.
***	No.	The market for long-existing substitutes for ironing boards (i.e. ironing mats) has not grown since 2010. *** has noticed growth in the market for garment steamers. *** considers garment steamers to be more of an appliance and not a totally fungible substitute for ironing boards.

6. a.) Have there been any changes in the level of competition between ironing tables produced in the United States, ironing tables produced in China, and such merchandise from other countries in the U.S. market or in the market for ironing tables in China since 2010?
- b.) Do you anticipate any changes in the level of competition between ironing tables produced in the United States, ironing tables produced in China, and such merchandise from other countries in the U.S. market or in the market for ironing tables in China within a reasonably foreseeable time?

<b>Purchaser</b>	<b>Changes that have occurred</b>	<b>Anticipated changes</b>
***	No.	No.
***	No.	No.
***	Vendors stopped producing ironing tables in China to be shipped to the US because the high duties made it too expensive for them to be competitively priced.	See response to 6a.
***	Yes, as noted earlier in 3b, *** is aware of increased production, and as a result, there is increased competition from Mexico.	Yes, again, *** is aware of increased production of ironing boards in Mexico. *** anticipates that Mexican ironing board production facilities will continue to develop and multiply in the next few years which is likely to result in more competition.

7. a.) Have there been any changes in the business cycle for ironing tables in the U.S. market or in the market for ironing tables in China since 2010?

b.) Do you anticipate any changes in the business cycle for ironing tables in the U.S. market or in the market for ironing tables in China within a reasonably foreseeable time?

<b>Purchaser</b>	<b>Changes that have occurred</b>	<b>Anticipated changes</b>
***	No.	No.
***	No.	No.
***	No.	No.
***	No.	No.



