

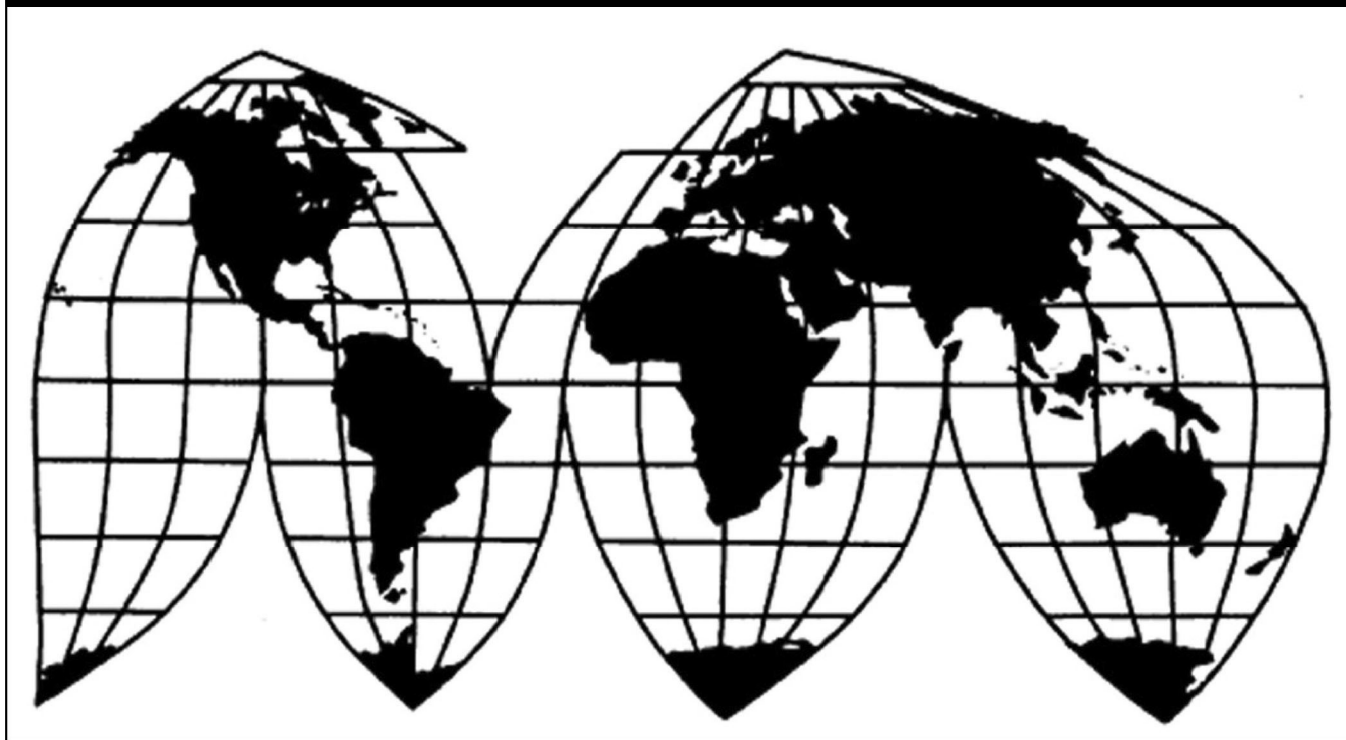
Ironing Tables and Certain Parts Thereof from China

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

Publication 5221

August 2021

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Alexandra Felchlin, Attorney
Calvin Chang, Supervisory Investigator

Address all communications to
Secretary to the Commission
United States International Trade Commission
Washington, DC 20436

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

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CONTENTS

	Page
Determination.....	1
Views of the Commission.....	3
Information obtained in this review	I-1
Background	I-1
Responses to the Commission’s notice of institution.....	I-2
Individual responses	I-2
Party comments on adequacy	I-2
The original investigation and subsequent reviews.....	I-3
The original investigation.....	I-3
The first five-year review	I-3
The second five-year review	I-4
Previous and related investigations.....	I-4
Commerce’s five-year review	I-4
The product.....	I-5
Commerce’s scope	I-5
U.S. tariff treatment.....	I-6
Description and uses.....	I-7
Manufacturing process	I-9
The industry in the United States	I-11
U.S. producers.....	I-11
Recent developments	I-12
U.S. producers’ trade and financial data	I-12
Definitions of the domestic like product and domestic industry	I-13
U.S. imports and apparent U.S. consumption	I-14
U.S. importers	I-14
U.S. imports	I-15
Apparent U.S. consumption and market shares.....	I-16
The industry in China	I-17
Antidumping or countervailing duty orders in third-country markets.....	I-19
The global market	I-19

Appendixes

A.	<i>Federal Register</i> notices	A-1
B.	Company-specific data	B-1
C.	Summary data compiled in prior proceedings	C-1
D.	Purchaser questionnaire responses	D-1

Note: Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets or by headings in confidential reports and is deleted and replaced with asterisks in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

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

Ironing Tables and Certain Parts Thereof from China

DETERMINATION

On the basis of the record¹ developed in the subject five-year review, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), 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 instituted this review on February 1, 2021 (86 FR 7737) and determined on May 7, 2021 that it would conduct an expedited review (86 FR 36771, July 13, 2021).

¹ The record is defined in § 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 be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original Investigation. 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”).¹ In July 2004, the Commission found 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”).² Following this affirmative determination, Commerce issued an antidumping duty order on imports of ironing tables from China on August 6, 2004.³

First review. The Commission instituted its first five-year review concerning the antidumping duty order on ironing tables from China on July 1, 2009.⁴ In June 2010, based on a full five-year review, 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.⁵ Commerce subsequently published a continuation of the antidumping duty order.⁶

¹ *Ironing Tables and Certain Parts Thereof From China*, Inv. No. 731-TA-1047 (Final), USITC Pub. 3711 (July 2004) (“*Original Determination*”) at 3.

² *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.

³ *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 (Aug. 6, 2004).

⁴ *Ironing Tables from China*, 74 Fed. Reg. 31755 (July 2, 2009).

⁵ *Ironing Tables and Certain Parts Thereof from China*, Inv. No. 731-TA-1047 (Review), USITC Pub. 4155 (June 2010) (“*First Review*”) at 3; *Ironing Tables and Certain Parts Thereof from China: Determination*, 75 Fed. Reg. 33636 (June 14, 2010).

⁶ *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).

Second Review. The Commission instituted the second five-year review on May 1, 2015.⁷ After conducting an expedited review, the Commission reached an affirmative determination in September 2015.⁸ Commerce subsequently published a continuation of the antidumping duty order.⁹

No litigation resulted from the Commission's prior proceedings.

Current Review. The Commission instituted the current five-year review on February 1, 2021.¹⁰ HPI filed a response to the notice of institution.¹¹ The Commission did not receive a response to the notice of institution from any respondent interested party.¹² On May 7, 2021, the Commission determined that the domestic interested party group response to the notice of institution was adequate and the respondent interested party group response was inadequate.¹³ In the absence of any other circumstances that would warrant a full review, the Commission determined that it would conduct an expedited review of the order.¹⁴ HPI submitted final comments pursuant to Commission rule 207.62(d)(1) on July 16, 2021.¹⁵

U.S. industry data for this review are based on information submitted by HPI, which reportedly accounted for all domestic production of ironing tables in 2020.¹⁶ U.S. import data and related information are based on Commerce's official import statistics.¹⁷ Foreign industry data and related information are based on information furnished by HPI, questionnaire responses from the original investigation and first five-year review, and publicly available

⁷ *Ironing Tables and Certain Parts Thereof From China; Institution of a Five-Year Review*, 80 Fed. Reg. 24968 (May 1, 2015).

⁸ *Ironing Tables and Certain Parts Thereof From China*, Inv. No. 731-TA-1047 (Second Review), USITC Pub. 4568 (Sep. 2015) ("Second Review") at 3; *Ironing Tables and Certain Parts Thereof From China*, 80 Fed. Reg. 59815 (Oct. 2, 2015).

⁹ *Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof From the People's Republic of China: Continuation of Antidumping Duty Order*, 81 Fed. Reg. 12070 (Mar. 8, 2015).

¹⁰ *Ironing Tables and Certain Parts Thereof From China; Institution of a Five-Year Review*, 86 Fed. Reg. 7737 (Feb. 1, 2021).

¹¹ See HPI Confidential Response to the Notice of Institution, EDIS Doc. 735797 (Feb. 3, 2021) ("Response"), and HPI Confidential Supplemental Response, EDIS Doc. 737582 (Mar. 21, 2021) ("Supplemental Response").

¹² Confidential Report, INV-TT-058 (Apr. 26, 2021) ("CR")/Public Report ("PR") at I-2.

¹³ Explanation of Commission Determination on Adequacy, EDIS Doc. 744098 (Jun. 7, 2021).

¹⁴ *Ironing Tables and Certain Parts Thereof From China; Scheduling of Expedited Five-Year Review*, 86 Fed. Reg. 36771 (Jul. 13, 2021).

¹⁵ HPI Final Comments, EDIS Doc. 747008 (Jul. 16, 2021) ("Comments").

¹⁶ CR/PR at Table I-1; Response at 34.

¹⁷ See CR/PR at Tables I-4 and I-5.

information gathered by the Commission.¹⁸ Three U.S. purchasers responded to the Commission's adequacy phase questionnaire in the current five-year review.¹⁹

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."²⁰ 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."²¹ 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.²²

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

¹⁸ See CR/PR at I-17, Tables I-6 and I-7.

¹⁹ CR/PR at D-3.

²⁰ 19 U.S.C. § 1677(4)(A).

²¹ 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. Dep't 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, 96th Cong., 1st Sess. 90-91 (1979).

²² 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).

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 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.²³

The scope definition set out above has remained the same since the prior determinations.²⁴

The term “ironing tables” is used to distinguish the subject 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

²³ *Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof From the People's Republic of China: Final Results of the Third Expedited Sunset Review of the Antidumping Duty Order*, 86 Fed. Reg. 30255 (Jun. 7, 2021) (“Commerce AD Sunset Determination”); *Issues and Decision Memorandum for the Expedited Sunset Review of the Antidumping Duty Order Floor-Standing, Metal-Top Ironing Tables and Certain Parts Thereof from the People’s Republic of China* (Jun. 1, 2021) at 2-3 (“Commerce AD I&D Memo”).

²⁴ See *Original Determination*, USITC Pub. 3711 at 5; *First Review*, USITC Pub. 4155 at 4-5; *Second Review*, USITC Pub. 4568 at 4-5.

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.²⁵

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 with a mesh-top or perforated top that consists of heat-safe padding. More expensive ironing tables 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. 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. Each leg of 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.²⁶ Ironing tables are sold in as many as five different retail price point categories.²⁷

In the original investigation, the Commission defined a single domestic like product as floor-standing, steel-top ironing tables, coextensive with the scope of the investigation.²⁸ The Commission rejected an argument that the domestic like product should be defined more broadly than the scope and include over-the-door boards. It found that, notwithstanding some overlap in physical characteristics, uses, and manufacturing facilities, there were substantial differences between ironing tables and over-the-door boards with respect to interchangeability, customer and producer perceptions, and price.²⁹

²⁵ CR/PR at I-7.

²⁶ CR/PR at I-7.

²⁷ The price point categories include: (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). CR/PR at I-8.

²⁸ *Original Determination*, USITC Pub. 3711 at 8.

²⁹ *Original Determination*, USITC Pub. 3711 at 6-7.

In both the first and second reviews, HPI did not dispute the definition of the domestic like product.³⁰ The Commission found that the record contained no new information that warranted revisiting the domestic like product definition, and again defined a single domestic like product coextensive with the scope definition in the previous reviews.³¹

The record in this current review contains no new information suggesting that the characteristics and uses of domestically produced ironing tables or any of the other domestic like product factors have changed since the prior proceedings.³² HPI agrees with the definition of the domestic like product adopted by the Commission in prior proceedings.³³ We therefore again define a single domestic like product consisting of ironing tables coextensive with Commerce's scope.

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 the product."³⁴ 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 the prior proceedings, the Commission defined the domestic industry to consist of all domestic producers of ironing tables.³⁵ In this third five-year review, HPI stated that it agrees with the definition of the domestic industry used in the prior proceedings.³⁶ There are no domestic industry issues arising under the related party provision in this review.³⁷ Therefore, we define the domestic industry to include all domestic producers of ironing tables, namely HPI.

³⁰ *First Review*, USITC Pub. 4155 at 5; *Second Review*, USITC Pub. 4586 at 6.

³¹ *First Review*, USITC Pub. 4155 at 5; *Second Review*, USITC Pub. 4586 at 6.

³² *See generally* CR/PR at I-5-6.

³³ Response at 38; *see also* Comments at 2.

³⁴ 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.

³⁵ *Original Determination*, USITC Pub. 3711 at 9; *First Review*, USITC Pub. 4155 at 6; *Second Review*, USITC Pub. 4586 at 7.

³⁶ Response at 38; Comments at 2.

³⁷ CR at I-14 and Response at 38. In the original investigation, the two domestic producers accounting for all U.S. production of ironing tables, HPI and Whitney Design, were subject to possible exclusion under the related parties provision because they imported subject merchandise, but the Commission found that appropriate circumstances did not exist to exclude either firm from the domestic

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.”³⁸ The Uruguay Round Agreements Act (“URAA”) 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.”³⁹ Thus, the likelihood standard is prospective in nature.⁴⁰ The U.S. Court of International Trade (“CIT”) 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.⁴¹

industry. *Original Determination*, USITC Pub. 3711 at 9. There were no related party issues in the first or second five-year reviews. See *First Review*, USITC Pub. 4155 at 6 n.8; and *Second Review*, USITC Pub. 4586 at 7 & n.25.

³⁸ 19 U.S.C. § 1675a(a).

³⁹ SAA, H.R. Rep. 103-316, vol. 1 at 883-84 (1994). 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.

⁴⁰ 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.

⁴¹ 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”);

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.”⁴² 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.”⁴³

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.”⁴⁴ 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).⁴⁵ The statute further provides 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.⁴⁶

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.⁴⁷ 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;

Usinor v. United States, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

⁴² 19 U.S.C. § 1675a(a)(5).

⁴³ 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.*

⁴⁴ 19 U.S.C. § 1675a(a)(1).

⁴⁵ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to the order under review. Commerce AD I&D Memo at 4.

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

⁴⁷ 19 U.S.C. § 1675a(a)(2).

(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.⁴⁸

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.⁴⁹

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.⁵⁰ 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 which any improvement in the state of the domestic industry is related to the order under review and whether the industry is vulnerable to material injury upon revocation.⁵¹

⁴⁸ 19 U.S.C. § 1675a(a)(2)(A-D).

⁴⁹ 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.

⁵⁰ 19 U.S.C. § 1675a(a)(4).

⁵¹ 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.

No respondent interested party participated in this expedited review. The record, therefore, contains limited new information with respect to the ironing table industry in China. There also is limited information regarding the ironing table market in the United States during the current period of review.⁵² Accordingly, for our determination, we rely as appropriate on the information available from the original investigation and subsequent reviews and the limited new information on the record in this 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.”⁵³ The following conditions of competition inform our determination.

1. Demand Conditions

Original Investigation. In the original investigation, the Commission found that the market for ironing tables was relatively stable and considered to be mature with only modest growth, and that the overall demand for ironing tables was likely to exhibit little change in response to changes in price.⁵⁴ The Commission found that, although ironing tables were available with a range of features and prices, far more imports of lower-priced models entered the U.S. market than higher-priced models, and more than three-quarters of ironing tables consumed in the United States over the period of investigation (“POI”) reportedly were in the opening price point category.⁵⁵ In addition, the Commission found concentration among buyers had increased as the number of retail purchasers fell over the POI, with only a few mass merchandisers dominating direct sales to consumers.⁵⁶

First Review. In the first five-year review, the Commission found overall U.S. demand for ironing tables generally moved in tandem with 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, as such, tended to fall during economic downturns. The

⁵² The period of review is calendar years 2015 through 2020.

⁵³ 19 U.S.C. § 1675a(a)(4).

⁵⁴ *Original Determination*, USITC Pub. 3711 at 9-10.

⁵⁵ *Original Determination*, USITC Pub. 3711 at 10.

⁵⁶ *Original Determination*, USITC Pub. 3711 at 10.

demand for ironing tables as measured by apparent U.S. consumption fluctuated over the period examined but decreased overall. Ironing tables reportedly were sold in as many as five different retail price point categories, but more than three quarters of ironing tables consumed in the United States reportedly were in the opening price point category.⁵⁷ 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.⁵⁸

Second Review. In the second review, the available data showed that demand for ironing tables had decreased slightly since 2009.⁵⁹ 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 resulted in a disinclination towards ironing.⁶⁰ It further stated that demand for ironing tables was typically driven by major life events that create new households (such as marriage, divorce, and college attendance) that showed some positive growth.⁶¹

Current Review. In the current review, the available data show that demand for ironing tables has decreased since the prior proceedings.⁶² Apparent U.S. consumption in 2020 was *** units, which is lower than it was in the original investigation and prior reviews.⁶³ HPI states that the COVID-19 pandemic has impacted the primary channels of ironing table sales, namely the retail purchase of ironing tables for discrete life events, such as weddings, and the purchase of ironing tables for the hospitality industry due to the reduction in travel.⁶⁴

2. Supply Conditions

Original Investigation. In the original investigation, the Commission found that the domestic industry’s share of apparent U.S. consumption had declined steadily and significantly

⁵⁷ *First Review*, USITC Pub. 4155 at 10.

⁵⁸ *First Review*, USITC Pub. 4155 at 11.

⁵⁹ *Second Review*, USITC Pub. 4586 at 11.

⁶⁰ *Second Review*, USITC Pub. 4586 at 11.

⁶¹ *Second Review*, USITC Pub. 4586 at 11.

⁶² CR/PR at Table I-5. The three purchasers of ironing tables that responded to the adequacy phase questionnaire (***) did not report any significant changes to demand or supply conditions for ironing tables in the United States during the current period of review. CR/PR at D-3.

⁶³ CR/PR at Table I-5.

⁶⁴ Response at 37; *see also* Comments at 4.

between 2001 and 2003.⁶⁵ One U.S. producer, HPI, closed a plant and consolidated production at another facility, while the other U.S. producer, Whitney Design, closed its U.S. production facility during the POI. Nonetheless, even with the 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 there were minimal sales of nonsubject ironing tables in the U.S. market and those consisted mostly of higher-value products.⁶⁶

First Review. In the first five-year review, the Commission found that HPI was the only domestic producer of ironing tables, and the domestic industry's annual capacity was unchanged from 2004 to 2009. The share of the U.S. market held by the domestic industry and subject imports fluctuated. Nonsubject imports' market share fell in each year of the period of review after 2005. By 2009, nonsubject imports accounted for only a small percentage of apparent U.S. consumption.⁶⁷

Second Review. In the second five-year review, HPI remained the sole domestic producer and largest supplier of ironing tables to the U.S. market.⁶⁸ The domestic industry's share 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 2003.⁶⁹ Subject imports' share of apparent U.S. consumption was *** percent in 2003, *** percent in 2009, and *** percent in 2014.⁷⁰ Nonsubject imports' presence in the U.S. market had increased since 2009.⁷¹

Current Review. The domestic industry was the largest source of supply to the U.S. market in 2020, accounting for *** percent of apparent U.S. consumption.⁷² While the domestic industry's share of apparent U.S. consumption remained higher than in 2003, it was lower than in 2009 and 2014.⁷³

Subject imports accounted for *** percent of apparent U.S. consumption in 2020, which is higher than their share in 2014.⁷⁴ Nonsubject imports were the second-largest source of

⁶⁵ *Original Determination*, USITC Pub. 3711 at 10.

⁶⁶ *Original Determination*, USITC Pub. 3711 at 10-11.

⁶⁷ *First Review*, USITC Pub. 4155 at 11-12.

⁶⁸ *Second Review*, USITC Pub. 4586 at 12.

⁶⁹ *Second Review*, USITC Pub. 4586 at 12; Commission Report, INV-NN-050 at Table I-6 (Jul. 23, 2015), EDIS Doc. 737226 ("Second Review CR").

⁷⁰ *Second Review*, USITC Pub. 4586 at 12; Second Review CR at Table I-6.

⁷¹ *Second Review*, USITC Pub. 4586 at 12; Second Review CR at Tables I-5 and I-6.

⁷² CR/PR at Table I-5.

⁷³ CR/PR at Table I-5.

⁷⁴ CR/PR at Table I-5.

supply in the U.S. market in 2020, accounting for *** percent of apparent U.S. consumption.⁷⁵ Taiwan, Vietnam, and Turkey were the largest sources of nonsubject imports during the current period of review.⁷⁶

3. Substitutability and Other Conditions

Original Investigation. In the original investigation, the Commission found that there was a relatively high degree of substitutability between the domestic like product and subject imports and that the vast majority of market participants reported that products from both sources were always interchangeable. The Commission also found that price and quality were important factors in purchasing decisions.⁷⁷

First Review. In the first five-year review, the Commission found there was a high degree of substitutability between domestically produced ironing tables and 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.⁷⁸

Second Review. In the second five-year review, the Commission found that there was no evidence to suggest that the high degree of substitutability between domestically produced ironing tables and subject imports or the importance of price in purchasing decisions had changed since the prior determinations.⁷⁹ Moreover, HPI reported that raw material costs continued to account for a substantial share of total COGS for ironing tables.⁸⁰

Current Review. The record in this review contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports, or the importance of price in purchasing decisions, has changed since the prior proceedings.⁸¹ Accordingly, we find that domestically produced ironing tables and subject imports are highly substitutable, and that price continues to be an important factor in purchasing decisions for ironing tables in the U.S. market.

⁷⁵ CR/PR at Table I-5.

⁷⁶ CR/PR at Table I-4.

⁷⁷ *Original Determination*, USITC Pub. 3711 at 11.

⁷⁸ *First Review*, USITC Pub. 4155 at 12.

⁷⁹ *Second Review*, USITC Pub. 4586 at 12.

⁸⁰ *Second Review*, USITC Pub. 4586 at 12.

⁸¹ HPI asserts that these conditions have not changed. Response at 27; *see also*, Comments at 3.

We note that effective September 24, 2018, ironing tables from China became subject to an additional 10 percent *ad valorem* duty under Section 301 of the Trade Act of 1974⁸² (“section 301 tariffs”).⁸³ Effective May 10, 2019, this additional duty increased from 10 percent to 25 percent *ad valorem*.⁸⁴ In contrast, ironing tables imported from China are not subject to additional duties under Section 232 of the Trade Expansion Act of 1962, as amended.⁸⁵ However, as of March 23, 2018, most steel mill products, including cold-rolled flat steel coils that are used to produce ironing tables – have been subject to an additional 25 percent *ad valorem* import duties.⁸⁶

C. Likely Volume of Subject Imports

1. The Prior Proceedings

Original Investigation. In the original investigation, the Commission found that the volume and market share of subject imports increased substantially throughout the POI. Subject imports nearly quadrupled in quantity and nearly tripled in 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. Subject import market share also increased dramatically between 2001 and 2003, while the domestic industry’s share of apparent U.S. consumption fell entirely at the expense of subject imports. The Commission found that moderate price declines did not significantly increase purchases over the period examined due to the long-lasting nature of ironing tables as a durable good; the increased volumes of subject imports at less-than-fair value had taken market share from the remaining domestic producer, rather than resulting in increased domestic consumption.⁸⁷

In response to respondents’ argument that the domestic product and subject imports did not compete, the Commission found that large customers purchased both perforated-top and mesh-top ironing tables, and that HPI produced both types and had capacity to produce

⁸² 19 U.S.C. § 2411.

⁸³ CR/PR at I-6; *Notice of Action Pursuant to Section 301: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 47974 (Sep. 21, 2018).

⁸⁴ CR/PR at I-6; *Notice of Modification of Section 301 Action: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20459 (May 9, 2019).

⁸⁵ CR/PR at I-6-7.

⁸⁶ CR/PR at I-7 n.24.

⁸⁷ *Original Determination*, USITC Pub. 3711 at 12.

substantially higher volumes. Consequently, the Commission found both the volume and increase in volume of subject imports to be significant, both in absolute terms and relative to consumption and production in the United States.⁸⁸

First 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 period of review even with the order in place. Although the record contained data only for a portion of the subject industry in China, it indicated that Chinese producers had considerable production capacity and unused capacity. The Commission found that the subject industry's reported capacity utilization rate indicated that available capacity existed in China to increase production of ironing tables if the antidumping duty order were revoked.⁸⁹

The Commission also found the Chinese industry to be 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; these producers continued to maintain a substantial presence in the U.S. market during the period of review despite the order and had established business relationships with U.S. purchasers of ironing tables that would enable them to increase shipments to the United States substantially in the event of revocation. Moreover, the Chinese industry faced a significant barrier in the EU, a main export market, after it imposed antidumping duties on imports of ironing boards which, for purposes of the EU determination, included ironing tables from China in April 2007.⁹⁰ Finally, the Commission found that end-of-period inventories of ironing tables held by producers in China increased steadily over the period of review 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 period of review 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 duty order, and Chinese producers' inventories, the Commission found that Chinese producers had the ability and incentive to ship significant volumes of additional exports to the United States in the event the order were revoked. Therefore, it found that the likely

⁸⁸ *Original Determination*, USITC Pub. 3711 at 13-14.

⁸⁹ *First Review*, USITC Pub. 4155 at 13-14.

⁹⁰ *First Review*, USITC Pub. 4155 at 14.

volume of subject imports, would be significant both in absolute terms and relative to production and consumption in the United States upon revocation of the order.⁹¹

Second Review. In the second five-year review, the Commission found that while the order had a disciplining effect on the volume of subject imports, subject imports continued to be present in the U.S. market.⁹² During the period of review, the annual quantity of subject imports was 652,000 units in 2010, 809,000 units in 2011, 1.1 million units in 2012, 403,000 units in 2013, and 439,000 units in 2014.⁹³ By contrast, during the original investigation, peak annual subject import volume was *** units.⁹⁴

The Commission also found that the ironing table industry in China had substantial capacity and was export oriented, with significant shipments to both the United States and the EU while the home market accounted for a small percentage of total shipments.⁹⁵ Furthermore, the Commission observed that ironing tables from China were subject to antidumping duties in 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 had reportedly caused a marked reduction of Chinese exports of ironing boards, which includes ironing tables, to the EU market.⁹⁶

Based on the foregoing, the Commission 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 in the event of revocation.⁹⁷

2. Current Review

The record in this five-year review indicates that the order has continued to have a disciplining effect on subject imports during the current period of review. The volume of subject imports decreased from a high of 1.3 million units in 2018 to 471,000 units in 2020.⁹⁸ As noted above, the peak annual volume of subject imports during the original POI was ***

⁹¹ *First Review*, USITC Pub. 4155 at 14.

⁹² *Second Review*, USITC Pub. 4586 at 14.

⁹³ *Second Review*, USITC Pub. 4586 at 14; *Second Review CR/PR* at Table I-4.

⁹⁴ *Second Review*, USITC Pub. 4586 at 14; *Second Review CR* at Table I-6; *see also*, *CR/PR* at C-3.

⁹⁵ *Second Review*, USITC Pub. 4586 at 14.

⁹⁶ *Second Review*, USITC Pub. 4586 at 15.

⁹⁷ *Second Review*, USITC Pub. 4586 at 15.

⁹⁸ *CR/PR* at Table I-4. The volume of subject imports was 297,000 units in 2015, 403,000 units in 2016, 736,000 units in 2017, and 838,000 units in 2019. *Id.*

units during 2003.⁹⁹ Subject imports accounted for *** percent of apparent U.S. consumption in 2020.¹⁰⁰

The facts available indicate that producers of ironing tables in China have the means to significantly increase exports of the subject merchandise to the United States should the order be revoked. As previously stated, no producer or exporter of subject merchandise participated in this expedited review. There is no information in the record calling into question our finding in the previous reviews that the industry in China is large and export oriented. To the contrary, HPI asserts that the industry in China has continued to expand.¹⁰¹ Additionally, Global Trade Atlas (“GTA”) data show that in each year between 2015 and 2020, China was by far the largest global exporter of metal furniture, a product category that includes ironing tables, and that its exports increased overall from 2015 to 2020.¹⁰²

Moreover, ironing table producers in China are likely to direct additional exports to the United States upon revocation. As discussed above, subject imports maintained a presence in the U.S. market throughout the period of review, though in substantially reduced quantities than the peak pre-order volume. And as HPI asserts, subject producers have increased their exports of ironing tables to Canada and Mexico, indicating their interest in the North American market.¹⁰³ GTA data further show that the United States was the top destination for China’s exports of metal furniture (a product category, which, as discussed above, includes ironing tables) throughout the period of review.¹⁰⁴ Furthermore, antidumping duty measures on imports of ironing boards, which includes ironing tables, from China imposed by the EU provide further incentive for subject producers to direct exports to the U.S. market upon revocation.¹⁰⁵

In light of the foregoing, we find that the volume of subject imports, both in absolute terms and relative to consumption in the United States, would likely be significant if the order were revoked.¹⁰⁶

⁹⁹ CR/PR at Table C-4.

¹⁰⁰ CR/PR at Table I-5.

¹⁰¹ Response at 24; *see also* Comments at 6.

¹⁰² CR/PR at Table I-7. Available GTA data concern a product category including both subject ironing tables and other products that are out of scope.

¹⁰³ Response at 24; *see also* Comments at 6.

¹⁰⁴ CR/PR at Table I-6. As noted, the available GTA data includes out-of-scope merchandise.

¹⁰⁵ CR/PR at I-19. Neither the U.S. producer, nor any responding U.S. purchaser, reported that the current Section 301 tariffs had an effect on supply or demand for subject imports or anticipated such effects in the reasonably foreseeable future. CR/PR at D-3.

¹⁰⁶ The record in this expedited review contains no information concerning inventories of the subject merchandise or the potential for product shifting. We observe that the European Commission in its 2019 expiry review determination to maintain duties on ironing boards (which includes ironing

D. Likely Price Effects

1. The Prior Proceedings

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 ironing tables sold to only three customers. These few large buyers had the ability to negotiate lower prices, and lower retail pricing by one of these large buyers could have resulted in widespread downward retail pricing, causing downward pressure on wholesale prices.¹⁰⁷

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. It relied principally on price comparisons between domestically produced and subject import mesh-top ironing tables. Pricing data showed that prices for Chinese mesh-top ironing tables were generally higher than those for the comparable domestic product through the first quarter of 2002. Thereafter, the Chinese tables were priced lower than the 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 2003.¹⁰⁸

Further, 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 pricing pressure. Given these lost sales and revenue data and that more than three-fourths (75 percent) of domestic consumption reportedly was in the opening price point category, the Commission found significant price depression.¹⁰⁹

tables) from China indicated that Chinese producers “produce other metal products on production lines that could easily be used for the production of ironing boards,” and concluded that this “enables Chinese producers to increase production of ironing boards by shifting production between the existing production lines depending on demand.” CR/PR at I-17.

¹⁰⁷ *Original Determination*, USITC Pub. 3711 at 14.

¹⁰⁸ *Original Determination*, USITC Pub. 3711 at 14-15.

¹⁰⁹ *Original Determination*, USITC Pub. 3711 at 15-16.

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.¹¹⁰

First 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, but concluded 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 period of review. Given these considerations, the Commission placed only limited weight on the price comparison data for the period of review.¹¹¹ Notwithstanding this, 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 and 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 was revoked.¹¹²

Second Review. In the second review, the Commission reiterated its finding that subject imports were highly substitutable for ironing tables manufactured in the United States and that price was an important factor in purchasing decisions.¹¹³ There were no current pricing data in the record due to the expedited nature of the review. Based on the available information, the Commission found that if the order were revoked, subject imports would likely undersell the domestic like product to gain market share, as had occurred during the original POI.¹¹⁴ Consequently, the Commission concluded that significant price effects were likely upon revocation.¹¹⁵

¹¹⁰ *Original Determination*, USITC Pub. 3711 at 16.

¹¹¹ *First Review*, USITC Pub. 4155 at 16-17.

¹¹² *First Review*, USITC Pub. 4155 at 17.

¹¹³ *Second Review*, USITC Pub. 4586 at 16.

¹¹⁴ *Second Review*, USITC Pub. 4586 at 17.

¹¹⁵ *Second Review*, USITC Pub. 4586 at 17.

2. Current Review

There is no new product-specific pricing information on the record of this expedited review. As previously discussed, we find that domestically produced ironing tables and subject imports are highly substitutable, and that price is an important factor in purchasing decisions. Consequently, if the antidumping duty order were revoked, subject imports would likely compete in the U.S. market on the basis of price by underselling the domestic like product, as they did during the POI. This, in turn, would likely cause the domestic industry either to lose sales and market share and/or to reduce prices or forgo price increases in order to compete with subject imports.

Accordingly, given their likely significant volume upon revocation, along with the high degree of substitutability between product sources and the importance of price in purchasing decision, we conclude that subject imports would likely undersell the domestic like product to a significant degree and have adverse price effects on the domestic like product if the antidumping duty order were revoked.

E. Likely Impact

1. The Prior Proceedings

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 2003.¹¹⁶

The Commission found that the industry's employment-related and financial indicators declined over the period as well. Although the domestic industry was profitable in 2003 and the industry's operating income ratio remained *** during the period, the Commission explained that the operating income ratio was only one of many factors the Commission examines in making its finding with respect to the impact of subject imports on the domestic

¹¹⁶ *Original Determination*, USITC Pub. 3711 at 17. *Confidential Original Determination*, EDIS Doc. 737213 at 27.

industry. The Commission found that most of the industry's COGS was ***, and that the cost of HPI's plant and equipment was ***. 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. Further, the Commission found that the injury to the domestic industry manifested itself primarily in the large declines in many of the industry indicators other than its operating margins.¹¹⁷

First Review. In the first five-year review, the Commission found the domestic industry's performance fluctuated from 2004 to 2008 before it improved substantially in 2009. The domestic industry's financial performance fluctuated greatly from 2004 to 2007, with a marked decrease in 2008 that reflected significant increases in raw material costs, particularly 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 these data and trends, the Commission did not find that the domestic industry was in a vulnerable state.¹¹⁸

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 purchasers 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.¹¹⁹

The Commission also considered the role of other factors, including nonsubject imports and changes in demand. 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, given the small volumes, were not likely to prevent a substantial increase in the volume of subject imports after revocation. The Commission examined demand, which it found 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 financial performance, notwithstanding the recession, was largely due to the decrease in raw material costs that was not likely to recur in the reasonably foreseeable future.¹²⁰

Consequently, the Commission found that the likely volume and price effects of the subject imports would likely have a significant adverse impact on the production, shipments,

¹¹⁷ *Original Determination*, USITC Pub. 3711 at 18. *Confidential Original Determination* at 28-30.

¹¹⁸ *First Review*, USITC Pub. 4155 at 18-19.

¹¹⁹ *First Review*, USITC Pub. 4155 at 19.

¹²⁰ *First Review*, USITC Pub. 4155 at 19-20.

sales, market share, and revenues of the domestic industry. In turn, the declines in these indicators would have 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, the Commission concluded that, if the antidumping duty order were revoked, subject imports from China would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.¹²¹

Second Review. In the second review, the Commission found that the information in the record was insufficient to make a finding on whether the domestic industry was vulnerable to the continuation or recurrence of material injury in the event of revocation of the order.¹²² Based on the information available, the Commission found that if the order was revoked, the likely significant volume and price effects of the subject imports would likely have a significant adverse effect on the domestic industry's production, shipments, employment levels, sales, and revenue, as well as its ability to raise capital and make and maintain necessary capital investments.¹²³

The Commission also considered the role of nonsubject imports in the U.S. market.¹²⁴ The Commission observed that while official import statistics indicated a substantial quantity of imports from nonsubject sources over the period of review, it was not clear whether these imports were of ironing tables or out-of-scope products.¹²⁵ Nevertheless, the Commission found that even if the imports from nonsubject sources in the official import statistics were assumed to be in-scope ironing tables, the presence of nonsubject imports did not preclude the domestic industry from achieving in 2014 a market share close to its historic peak since the issuance of the order, as well as having increased average unit values ("AUVs") and a strong financial performance.¹²⁶ Accordingly, the Commission concluded that the likely adverse effects of revocation would not be attributable to nonsubject imports.¹²⁷ Therefore, the Commission found that if the order were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.¹²⁸

¹²¹ *First Review*, USITC Pub. 4155 at 20.

¹²² *Second Review*, USITC Pub. 4568 at 19.

¹²³ *Second Review*, USITC Pub. 4568 at 19.

¹²⁴ *Second Review*, USITC Pub. 4568 at 19-20.

¹²⁵ *Second Review*, USITC Pub. 4568 at 19-20.

¹²⁶ *Second Review*, USITC Pub. 4568 at 20.

¹²⁷ *Second Review*, USITC Pub. 4568 at 20.

¹²⁸ *Second Review*, USITC Pub. 4568 at 20.

2. The Current Review

Due to the expedited nature of this review, the record contains limited new information on the domestic industry's condition aside from data provided by HPI in its response to the notice of institution.

The information on the record indicates that in 2020, the domestic industry's capacity was *** units, its production was *** units, and its capacity utilization was *** percent.¹²⁹ U.S. shipments were *** units, valued at \$***, with an AUV of \$*** per unit.¹³⁰ In 2020, the domestic industry had net sales revenues of \$***, COGS of \$***, a gross profit of \$***, and an operating income of \$***; its ratio of operating income to net sales was *** percent.¹³¹ Because of the expedited nature of this review, the information in the record is insufficient for us to make a finding as to whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the order.

Based on the information available in this review, we find that revocation of the order would likely lead to a significant volume of subject imports that would likely significantly undersell the domestic like product, leading subject imports to gain market share and/or have price-depressing or suppressing effects on the domestic like product. Subject imports' significant volume and significant price effects would consequently likely have a significant adverse effect on the domestic industry's production, capacity utilization, shipments, employment, and profitability. As previously discussed, apparent U.S. consumption was lower in 2020 than in 2003, 2009, and 2014.¹³² Moreover, HPI states that its steel costs have increased.¹³³ Declining U.S. demand and rising raw material costs will likely exacerbate the adverse effects of subject imports.

¹²⁹ CR/PR at Table I-3. Capacity was higher than in 2003, 2009, or 2014. Production and capacity utilization in 2020 were lower than in 2003, 2009, or 2014. *See id.*

¹³⁰ CR/PR at Table I-3. The quantity of U.S. shipments was lower than in the previous periods of investigation and review, while the value of U.S. shipments in 2020 was higher than in 2003, but lower than in 2009 and 2014. The AUV of U.S. shipments was higher in 2020 than in 2003, 2009, and 2014. *See id.*

¹³¹ CR/PR at Table I-3. The industry's net sales during the period of review were lower than in all previous periods. COGS were higher in 2020 than during the original investigation in 2003, but lower than the proceeding reviews in 2009 and 2014. The operating income ratio and gross profit were lower in 2020 than in 2003, 2009, and 2014. *See id.* HPI explains that the recent increase in steel and labor costs, together with the decline in sales due to COVID-19, caused the reduction in the industry's profitability in 2020 compared to prior periods, and asserts that it has developed a "comprehensive efficiency plan" to significantly reduce expenses. Response at 14-20.

¹³² CR/PR at Table I-5.

¹³³ Response at 18.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute injury from other factors to the subject imports. Although nonsubject imports have increased their presence in the U.S. market since the previous reviews, and their market share was *** percent in 2020,¹³⁴ the record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant quantities upon revocation of the order. Given the high degree of substitutability of the domestic like product and subject imports, and the fact that the domestic industry is the largest source of supply to the U.S. market, any increase in subject import market share would likely come, at least in substantial proportion, at the expense of the domestic industry. In light of these considerations, we find that any likely effects of imports from nonsubject countries are distinguishable from the likely effects we have attributed to the subject imports.

Accordingly, we conclude that if the antidumping duty order was revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

IV. Conclusion

For the above reasons, we determine 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.

¹³⁴ CR/PR at Table I-5.

Information obtained in this review

Background

On February 1, 2021, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted a review to determine whether revocation of the antidumping duty order on ironing tables and certain parts thereof (“ironing tables”) from China would be likely to lead to continuation or recurrence of material injury.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.^{3 4} The following tabulation presents information relating to the background and schedule of this proceeding:

Effective date	Action
February 1, 2021	Notice of initiation by Commerce (86 FR 7709, February 1, 2021)
February 1, 2021	Notice of institution by Commission (86 FR 7737, February 1, 2021)
May 7, 2021	Commission’s vote on adequacy
June 1, 2021	Commerce’s results of its expedited review
August 13, 2021	Commission’s determination and views

¹ 19 U.S.C. 1675(c).

² 86 FR 7737, February 1, 2021. 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. 86 FR 7709, February 1, 2021. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

³ 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 the original investigation and subsequent full review are presented in app. C.

⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject review. It was filed on behalf of Home Products International, Inc. (“HPI”), a domestic producer of ironing tables (referred to herein as 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.

Table I-1
Ironing tables: Summary of responses to the Commission’s notice of institution

Type of interested party	Completed responses	
	Number of firms	Coverage
Domestic:		
U.S. producer	1	100%

Note: The U.S. producer coverage figure presented is the domestic interested party’s estimate of its share of total U.S. production of ironing tables during 2020. Domestic interested party’s response to the notice of institution, March 3, 2021, p. 34.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct an expedited or full review from HPI. HPI requests that the Commission conduct an expedited review of the antidumping duty order on ironing tables from China.⁵

⁵ Domestic interested party’s comments on adequacy, April 9, 2021, p. 1.

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 HPI, Chicago, Illinois.⁶ On June 24, 2004, Commerce determined that imports of ironing tables from China were being sold at less than fair value (“LTFV”).⁷ The Commission determined on July 28, 2004 that the domestic industry was materially injured by reason of LTFV imports of ironing tables from China.⁸ On August 6, 2004, Commerce amended its final determination after HPI filed ministerial error allegations and subsequently issued its antidumping duty order with the revised final weighted-average dumping margins ranging from 9.47 to 157.68 percent.⁹

The first five-year review

On October 5, 2009, the Commission determined that it would conduct a full review of the antidumping duty order on ironing tables from China.¹⁰ On November 3, 2009, Commerce determined that revocation of the antidumping duty order on ironing tables from China would be likely to lead to continuation or recurrence of dumping.¹¹ On June 8, 2010, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹² Following affirmative determinations in the five-year reviews 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.¹³

⁶ Ironing Tables and Certain Parts Thereof from China, Inv. No. 731-TA-1047 (Final), USITC Publication 3711, July 2004 (“Original publication”), p. I-1.

⁷ 69 FR 35296, June 24, 2004.

⁸ 69 FR 47177, August 4, 2004. Commissioner Daniel R. Pearson determined that the domestic industry was threatened with material injury by reason of subject imports from China.

⁹ 69 FR 47868, August 6, 2004.

¹⁰ 74 FR 54066, October 21, 2009.

¹¹ 74 FR 56794, November 3, 2009.

¹² 75 FR 33636, June 14, 2010.

¹³ 75 FR 36629, June 28, 2010.

The second five-year review

On August 4, 2015, the Commission determined that it would conduct an expedited review of the antidumping duty order on ironing tables from China.¹⁴ On September 3, 2015, Commerce determined that revocation of the antidumping duty order on ironing tables from China would be likely to lead to continuation or recurrence of dumping.¹⁵ On September 28, 2015, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹⁶ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective March 8, 2016, Commerce issued a continuation of the antidumping duty order on imports of ironing tables from China.¹⁷

Previous and related investigations

Ironing tables have not been the subject of any prior related antidumping or countervailing duty investigations in the United States.

Commerce's five-year review

Commerce is conducting an expedited review with respect to the order on imports of ironing tables from China and intends to issue the final results of this review based on the facts available not later than June 1, 2021.¹⁸ Commerce's Issues and Decision Memorandum, published concurrently with Commerce's final results, will contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anti-circumvention. Upon publication, a complete version of the Issues and Decision Memorandum can be accessed at <http://enforcement.trade.gov/frn/>. The Issues and Decision Memorandum will also include any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping duty order on imports of ironing tables from China are noted in the sections titled "The original investigation" and "U.S. imports," if applicable.

¹⁴ 80 FR 50027, August 18, 2015.

¹⁵ 80 FR 53281, September 3, 2015.

¹⁶ 80 FR 59815, October 2, 2015.

¹⁷ 81 FR 12070, March 8, 2016.

¹⁸ Letter from Abdelali Elouaradia, Office Director, Office IV, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, March 23, 2021.

The product

Commerce's scope

Commerce has defined the scope 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 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 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.*¹⁹

U.S. tariff treatment

Ironing tables are currently imported under HTS statistical reporting number 9403.20.0011. The in-scope metal top and leg components are currently imported under HTS statistical reporting number 9403.90.8041. Ironing tables and the parts thereof imported from China enter the U.S. market at a column 1-general duty rate of “Free.”²⁰

Effective September 24, 2018, ironing tables and the parts thereof imported from China were assessed an additional 10 percent ad valorem duty (which increased to 25 percent as of May 10, 2019) by the Office of the United States Trade Representative (“USTR”), under Section 301 of the Trade Act of 1974, as amended.²¹ See also U.S. notes 20(e), 20(f), and 20(l) to subchapter III of HTS chapter 99.²² As of April 1, 2021, USTR has not granted any exemptions for ironing tables and the parts thereof from the Section 301 duties.²³ Ironing tables and the parts thereof are not subject to an additional ad valorem national security import duty under Section

¹⁹ 81 FR 12070, March 8, 2016.

²⁰ HTSUS (2021) Basic Revision 2, USITC Publication 5181, April 2021, pp. 94-8, 94-11, and 94-20.

²¹ 19 U.S.C. § 2411. HTS subheadings 9403.20.0011 and 9403.90.8041 were included in the USTR’s third enumeration (“Tranche 3” or “List 3”) of products imported from China that became subject to the additional 10 percent ad valorem duties (Annexes A and C of 83 FR 47974, September 21, 2018) as of September 24, 2018. Escalation of this duty to 25 percent ad valorem was rescheduled from January 1, 2019 (Annex B of 83 FR 47974, September 21, 2018) to March 2, 2019 (83 FR 65198, December 19, 2018), but was subsequently postponed until further notice (84 FR 7966, March 5, 2019), and then was implemented as of May 10, 2019 (84 FR 20459, May 9, 2019). A subsequent modification was provided for subject goods exported from China prior to May 10, 2019 not to be subject to the escalated 25 percent duty as long as such goods entered into the United States prior to June 1, 2019 (84 FR 21892, May 15, 2019). USTR proposed raising this additional duty from 25 percent to 30 percent on such products imported from China, on or after October 1, 2019 (Annex C – (List 3 - \$200 Billion Action), Part 1, of 84 FR 46212, September 3, 2019).

²² HTSUS (2021) Basic Revision 2, USITC Publication 5181, April 2021, pp. 99-III-23 – 99-III-24, 99-III-46, 99-III-54, and 99-III-241 – 99-III-248.

²³ HTS U.S. note 20, subchapter III, chapter 99; and USITC, “Harmonized Tariff Information,” April 1, 2021, https://www.usitc.gov/harmonized_tariff_information, retrieved April 15, 2021.

232 of the Trade Expansion Act of 1962, as amended.²⁴ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Description and uses²⁵

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 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.

²⁴ 19 U.S.C. 1862. However, as of March 23, 2018, most steel mill products (including the cold-rolled flat steel coils that are the raw materials for manufacturing ironing tables) have been subject to 25 percent ad valorem Section 232 import duties, with duty exemptions and quota exemption limits for imports originating in certain U.S. trade partners. For further information, see U.S. Customs and Border Protection (“CBP”), “Trade Remedies, Information on Trade Remedy Questions and Resources, Section 232 Trade Remedies on Aluminum and Steel,” no date, <https://www.cbp.gov/trade/programs-administration/trade-remedies#>, retrieved March 24, 2021.

²⁵ Unless otherwise noted, this information is based on Ironing Tables and Certain Parts Thereof from China, Inv. No. 731-TA-1047 (Second Review), USITC Publication 4568, September 2015 (“Second review publication”), pp. I-4 – I-5.

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, retrieved March 29, 2021.

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 often manufactured by European producers and may be up to five times more expensive than ordinary collapsible ironing tables made in the United States.

Manufacturing process²⁶

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,²⁷ which are long sheets and strips of flat-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. 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, which 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

²⁶ Unless otherwise noted, this information is based on second review publication, pp. I-6 – I-7.

²⁷ Since the second five-year review, Commerce has issued a combination of antidumping and countervailing duty orders on cold-rolled steel flat products from China, Japan, Brazil, India, Korea, and the United Kingdom. 81 FR 45956, July 14, 2016; 81 FR 45960, July 14, 2016; 81 FR 64432, September 20, 2016; and 81 FR 64436, September 20, 2016.

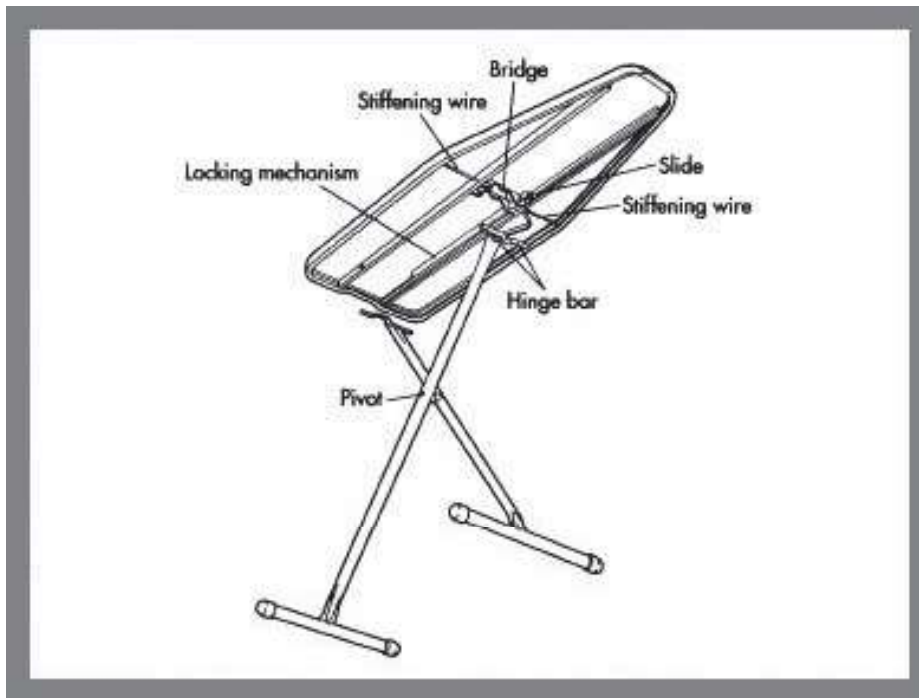
welder is then inspected to ensure that the pressure points are securely welded. After this process, the metal top with the assembled hangers, ribs, and locking mechanism awaits the painting process.

In order to form the legs and feet of the ironing table, the cold-rolled flat steel is rolled into tubes and the ends of the flat steel are welded together. A sharp carbide tool is scraped over the rough edge of the longitudinal 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 lengths. The feet are attached to the legs by rivets, and the legs are now complete.

The tops, legs and feet are then sprayed with a degreaser, dried, and painted in either a wet (liquid) or powder process. 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.

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 tabletop. For the hotel market, fabric covers are permanently affixed to the foam pads and tabletops. Finally, the ironing table is shrink-wrapped and packed in a carton for shipment.

Figure I-2
Ironing tables: Parts of an Ironing Table



Source: How Products are Made, Volume 7, [www.madehow.com/Volume 7/Ironing-Board.html](http://www.madehow.com/Volume%207/Ironing-Board.html), retrieved March 29, 2021.

The industry in the United States

U.S. producers

During the final phase of the original investigation, the Commission received U.S. producer questionnaires from two firms, HPI and Whitney Design, Inc. (“Whitney Design”), which accounted for all production of ironing tables in the United States during January 2001-March 2004.²⁸

During the first five-year review, the Commission received a U.S. producer questionnaire from one firm, HPI, which accounted for all production of ironing tables in the United States during 2009.²⁹

²⁸ Original publication, p. III-1. Whitney Design ceased production of ironing tables in April 2002.

²⁹ Ironing Tables and Certain Parts Thereof from China, Inv. No. 731-TA-1047 (Review), USITC Publication 4155, June 2010 (“First review publication”), p. III-1.

In response to the Commission’s notice of institution during the second five-year review, the domestic interested party (HPI) identified itself as the sole domestic producer of ironing tables in that proceeding.³⁰

In response to the Commission’s notice of institution in this current review, the domestic interested party (HPI) identified itself as the sole domestic producer of ironing tables in this proceeding.³¹

Recent developments

Since the Commission’s last five-year review, the following developments have occurred in the ironing tables industry: higher steel prices and wages have increased production costs, the COVID-19 pandemic resulted in a drop in demand, and HPI’s product mix has shifted towards more labor-intensive products.³² Table I-2 presents events in the U.S. industry since the last five-year review.

Table I-2
Ironing tables: Recent developments in the U.S. industry

Item	Firm	Event
Input prices	HPI	Higher steel prices affected total production costs since steel is the primary raw material used in ironing tables. Wages increased due to low local unemployment in the area of the plants.
Demand shift	HPI	The COVID-19 recession exacerbated the production decline of domestic ironing tables as milestone life events such as weddings for which ironing tables are purchased and travel were postponed.
Product mix shift	HPI	A certain product mix change occurred for HPI, shifting into ironing tables that are “a bit more labor intensive.”

Source: Domestic interested party’s response to the notice of institution, March 3, 2021, pp. 14 and 17-19.

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 in the current five-year review.³³ Table I-3 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigation and subsequent five-year reviews.

³⁰ Second review publication, p. I-12.

³¹ Domestic interested party’s response to the notice of institution, March 3, 2021, p. 4.

³² Domestic interested party’s response to the notice of institution, March 3, 2021, pp. 14 and 17-19.

³³ Individual company trade and financial data are presented in app. B.

Table I-3**Ironing tables: Trade and financial data submitted by U.S. producers, 2003, 2009, 2014, and 2020**

Item	2003	2009	2014	2020
Capacity (1,000 units)	***	***	***	***
Production (1,000 units)	***	***	***	***
Capacity utilization (percent)	***	***	***	***
U.S. shipments:				
Quantity (1,000 units)	***	***	***	***
Value (\$1,000)	***	***	***	***
Unit value (per unit)	\$***	\$***	\$***	\$***
Net sales (\$1,000)	***	***	***	***
COGS (\$1,000)	***	***	***	***
COGS/net sales (percent)	***	***	***	***
Gross profit (loss) (\$1,000)	***	***	***	***
SG&A expenses (\$1,000)	***	***	***	***
Operating income (loss) (\$1,000)	***	***	***	***
Operating income (loss)/net sales (percent)	***	***	***	***

Note: For a discussion of data coverage, please see “U.S. producers” section.

Source: For the year 2003, data are compiled using data submitted in the Commission’s original investigation. For the years 2009 and 2014, data are compiled using data submitted in the Commission’s first five-year review and second five-year review, respectively. For the year 2020, data are compiled using data submitted by the domestic interested party. Domestic interested party’s response to the notice of institution, March 3, 2021, p. 34; and domestic interested party’s supplemental response to the notice of institution, March 21, 2021, p. 2.

Definitions of the domestic like product and domestic industry

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. 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. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.³⁴

³⁴ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

In its original determination, its full first five-year review determination, and its expedited second five-year review determination, the Commission found one domestic like product consisting of ironing tables and certain parts thereof, coextensive with Commerce's scope. In its original determination, its full first five-year review determination, and its expedited second five-year review determination, the Commission defined the domestic industry as all U.S. producers of the domestic like product.³⁵ HPI states that it agrees with the definitions of the domestic like product and domestic industry the Commission adopted in the prior proceedings.³⁶ HPI also indicated that neither it, nor any affiliated entity, imported subject merchandise from 2015 to 2020.³⁷

U.S. imports and apparent U.S. consumption

U.S. importers

During the final phase of the original investigation, the Commission received U.S. importer questionnaires from 11 firms, which accounted for approximately 90 percent (or greater) of total U.S. imports of ironing tables from China during 2003.³⁸ Import data presented in the original investigation are based on questionnaire responses.

During the first five-year review, the Commission received U.S. importer questionnaires from ten firms, which were believed to cover the large majority of imports from China during the period of review.³⁹ Import data presented in the first five-year review are based on questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in its second five-year review, the domestic interested party provided a list of eight firms that may have imported ironing tables from China at that time.⁴⁰ Import data presented in the second five-year review are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in this current five-year review, in its response to the Commission's notice of institution,

³⁵ 86 FR 7737, February 1, 2021.

³⁶ Domestic interested party's response to the notice of institution, March 3, 2021, p. 38.

³⁷ Domestic interested party's supplemental response to the notice of institution, March 21, 2021, p. 1.

³⁸ Original publication, p. IV-1.

³⁹ Investigation No. 731-TA-1047 (Review): Ironing Tables and Certain Parts Thereof from China, Confidential Report, INV-HH-047, May 7, 2010 ("First review confidential report"), pp. I-21 and IV-1.

⁴⁰ Second review publication, p. I-13.

the domestic interested party provided a list of ten potential U.S. importers of ironing tables from China.⁴¹

U.S. imports

Table I-4 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2020 imports by quantity).

Table I-4
Ironing tables: U.S. imports, 2015-20

Item	2015	2016	2017	2018	2019	2020
Quantity (1,000 units)						
China (subject)	297	403	736	1,327	838	471
Taiwan	12	9	26	150	598	407
Vietnam	22	91	99	71	220	215
Turkey	123	207	195	315	243	186
All other sources	357	408	601	692	630	551
Subtotal, nonsubject	514	715	920	1,228	1,691	1,359
Total imports	811	1,118	1,657	2,555	2,529	1,830
Landed, duty-paid value (\$1,000)						
China (subject)	4,423	5,482	9,667	19,174	14,360	7,905
Taiwan	154	117	391	2,264	8,276	6,890
Vietnam	301	1,162	1,286	1,723	4,743	3,518
Turkey	1,542	2,647	2,392	3,837	2,975	2,127
All other sources	5,531	6,639	9,921	13,146	11,038	9,401
Subtotal, nonsubject	7,527	10,565	13,990	20,971	27,032	21,936
Total imports	11,950	16,047	23,657	40,145	41,392	29,841
Unit value (dollars per unit)						
China (subject)	14.89	13.60	13.13	14.45	17.14	16.78
Taiwan	12.83	13.00	15.04	15.09	13.84	16.93
Vietnam	13.68	12.77	12.99	24.27	21.56	16.36
Turkey	12.54	12.79	12.27	12.18	12.24	11.44
All other sources	15.49	16.27	16.51	19.00	17.52	17.06
Subtotal, nonsubject	14.64	14.78	15.21	17.08	15.99	16.14
Total imports	14.73	14.35	14.28	15.71	16.37	16.31

Note: Because of rounding, figure may not add to total shown.

Note: These data do not include in-scope metal top and leg components of ironing tables, which are classified under HTS statistical reporting number 9403.90.8041. U.S. imports of ironing table parts and components were not included in this dataset because the quantity of such imports cannot be measured with a single unit of measurement.

Source: Compiled from official Commerce statistics for HTS statistical reporting number 9403.20.0011, accessed March 24, 2021.

⁴¹ Domestic interested party's response to the notice of institution, March 3, 2021, pp. 28-29.

Apparent U.S. consumption and market shares

Table I-5 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table I-5
Ironing tables: U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares 2003, 2009, 2014, and 2020

Item	2003	2009	2014	2020
Quantity (1,000 units)				
U.S. producers' U.S. shipments	***	***	***	***
U.S. imports from—				
China	***	***	439	471
All other sources	***	***	422	1,359
Total imports	***	***	861	1,830
Apparent U.S. consumption	***	***	***	***
Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	***
U.S. imports from—				
China	***	***	4,823	7,905
All other sources	***	***	7,267	21,936
Total imports	***	***	12,090	29,841
Apparent U.S. consumption	***	***	***	***
Share of consumption based on quantity (percent)				
U.S. producer's share	***	***	***	***
U.S. imports from—				
China	***	***	***	***
All other sources	***	***	***	***
Total imports	***	***	***	***
Share of consumption based on value (percent)				
U.S. producer's share	***	***	***	***
U.S. imports from—				
China	***	***	***	***
All other sources	***	***	***	***
Total imports	***	***	***	***

Note: For 2003 and 2009, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

Source: For the year 2003, data are compiled using data submitted in the Commission's original investigation. For the years 2009 and 2014, data are compiled using data submitted in the Commission's first five-year review and second five-year review, respectively. For the year 2020, U.S. producers' U.S. shipments are compiled from the domestic interested party's supplemental response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 9403.20.0011, accessed March 24, 2021.

The industry in China

During the final phase of the original investigation, the Commission received foreign producer/exporter questionnaires from four firms.⁴² These four Chinese producers of ironing tables reported *** units of total shipments in 2003, of which *** units (***) percent) were exported to the United States.⁴³

During the first five-year review, the Commission received foreign producer/exporter questionnaires from six firms. These six Chinese producers of ironing tables reported *** units of total shipments in 2009, of which *** units (***) percent) were exported to the United States.⁴⁴

Although the Commission did not receive responses from any respondent interested parties in its second five-year review, the domestic interested party provided a list of 23 possible producers/exporters of ironing tables in China in that proceeding.⁴⁵

Although the Commission did not receive responses from any respondent interested parties in this five-year review, the domestic interested party provided a list of 25 possible producers/exporters of ironing tables in China.⁴⁶

The European Commission did not conduct an investigation in its most recent expiry review in 2019 of the Chinese industry but noted that based upon the facts available at the time of the determination, it appeared the “manufacturing process is mainly labour *** based” in China.⁴⁷ The 2019 EU determination also found that Chinese producers “produce other metal products on production lines that could easily be used for the production of ironing boards,” and concluded that this “enables Chinese producers to increase production of ironing boards by shifting production between the existing production lines depending on demand.”⁴⁸ Information was not readily available about other major industry events in China since the last five-year review.

⁴² Original publication, p. VII-1.

⁴³ Investigation No. 731-TA-1047 (Final): Ironing Tables and Certain Parts Thereof from China, Confidential Report, INV-BB-087, July 2, 2004, (“Original confidential report”) p. VII-3.

⁴⁴ First review confidential report, pp. IV-7 – IV-8.

⁴⁵ Second review publication, p. I-19.

⁴⁶ Domestic interested party’s response to the notice of institution, March 3, 2021, pp. 30-32.

⁴⁷ *Official Journal of the European Union*, October 1, 2019, L 252/22.

⁴⁸ *Official Journal of the European Union*, October 1, 2019, L 252/22.

Table I-6 presents export data for other metal furniture, a category that includes ironing tables and out-of-scope products, from China (by export destination in descending order of value for 2020). The leading export market for other metal furniture from China, by value, in 2020 was the United States, which accounted for 29.3 percent of exports.

Table I-6
Other metal furniture: Exports from China, by destination, 2015-20

Item	Calendar year					
	2015	2016	2017	2018	2019	2020
Value (1,000 dollars)						
United States	2,220,399	2,178,923	2,487,215	3,051,441	2,679,892	2,949,704
Singapore	193,775	132,884	80,472	156,479	319,693	460,239
Japan	277,359	275,482	293,629	318,195	335,830	458,191
United Kingdom	360,723	314,546	311,516	346,789	408,100	444,061
Australia	255,690	232,653	243,683	287,040	307,569	430,259
Saudi Arabia	160,455	129,188	127,893	140,605	204,151	385,507
Germany	255,429	238,458	251,415	270,794	327,417	357,300
Korea	100,950	102,613	115,068	132,068	187,051	348,966
Malaysia	192,501	118,374	119,827	151,794	291,382	335,266
Canada	216,245	198,477	209,042	250,317	296,877	332,497
All other	2,695,716	2,354,508	2,508,120	2,825,360	3,119,028	3,567,539
Total	6,929,242	6,276,106	6,747,879	7,930,882	8,476,989	10,069,529

Note: Because of rounding, figures may not add to totals shown.

Source: IHS Markit, Global Trade Atlas, HS subheading 9403.20, accessed April 5, 2021. These data do not include in-scope metal top and leg components of ironing tables, which are classified under HTS statistical reporting number 9403.90.8041.

Antidumping or countervailing duty orders in third-country markets

In April 2007, the EU imposed antidumping duties on ironing boards from China.⁴⁹ These duties applied to 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.⁵⁰ Subsequently, the EU conducted two sunset (or “expiry”) reviews, with the most recent review in 2019. In October 2019, the EU determined that the duties would be maintained through October 2024. The current EU antidumping duties range from 18.1 percent to 42.3 percent, depending on the producer.⁵¹

The global market

There is limited information available with respect to ironing tables as defined by Commerce’s scope. The largest suppliers of other metal furniture products to the global market are China, Germany, Taiwan, and the United States. According to GTA, global exports for other metal furniture products were approximately \$18.1 billion in 2020. China is the largest exporter of other metal furniture products globally, making up 55.6 percent of the global exports in terms of value in 2020. Germany is the next largest exporter, accounting for 7.6 percent of all global exports of other metal furniture, by value, in 2020.

Table I-7 presents global export data for other metal furniture, a category that includes ironing tables and out-of-scope products (by source in descending order of value for 2020).

⁴⁹ *Official Journal of the European Union*, October 1, 2019, L252/1.

⁵⁰ *Official Journal of the European Union*, October 1, 2019, L252/5.

⁵¹ *Official Journal of the European Union*, July 15, 2013, L198/20 and October 1, 2019, L 252/34.

Table I-7
Other metal furniture: Global exports by major sources, 2015-20

Item	Calendar year					
	2015	2016	2017	2018	2019	2020
	Value (1,000 dollars)					
China	6,929,242	6,276,106	6,747,879	7,930,882	8,476,989	10,069,529
Germany	1,271,348	1,322,746	1,421,001	1,522,267	1,495,600	1,368,323
Taiwan	493,616	474,534	477,961	493,402	612,157	677,192
United States	866,624	782,799	756,701	815,881	764,996	637,460
Italy	581,480	582,206	617,552	679,849	683,518	593,792
Netherlands	231,042	337,611	392,085	478,526	492,664	525,470
Poland	218,382	243,749	287,666	352,944	398,499	409,662
Canada	419,057	457,457	461,719	474,840	486,048	404,398
Czechia	170,591	191,772	199,242	222,605	232,550	367,962
Spain	241,704	273,599	305,191	293,811	303,739	259,231
All other	2,580,969	2,640,719	2,887,058	3,268,801	3,055,386	2,802,926
Total	14,004,055	13,583,298	14,554,055	16,533,806	17,002,146	18,115,945

Note: Because of rounding, figures may not add to total shown.

Source: IHS Markit, Global Trade Atlas, HS subheading 9403.20, accessed April 5, 2021. These data do not include in-scope metal top and leg components of ironing tables, which are classified under HTS statistical reporting number 9403.90.8041.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, 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
86 FR 7709 February 1, 2021	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02078.pdf
86 FR 7737 February 1, 2021	<i>Ironing Tables and Certain Parts Thereof From China; Institution of a Five-Year Review</i>	https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02032.pdf

APPENDIX B
COMPANY-SPECIFIC DATA

* * * * *

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table C-1
Ironing tables: Summary data concerning the U.S. market, 2001-03, January-March 2003, and January-March 2004

(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			
	2001	2002	2003	January-March		2001-03	2001-2002	2002-2003	Jan.-Mar. 2003-2004
				2003	2004				
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China (subject)	***	***	***	***	***	***	***	***	***
Nonsubject	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China (subject)	***	***	***	***	***	***	***	***	***
Nonsubject	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. shipments of:									
Subject imports from China:									
Quantity	456	1,252	2,538	573	370	456.0	174.3	102.7	-35.4
Value	5,726	11,350	21,323	4,808	4,508	272.4	98.2	87.9	-6.2
Unit value	\$12.55	\$9.07	\$8.40	\$8.40	\$12.20	-33.0	-27.7	-7.3	45.2
Ending inventory quantity	155	397	344	309	252	121.8	155.8	-13.3	-18.6
Nonsubject imports:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Total imports:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
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/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) Not applicable.

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.

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 the domestic interested party and it named the following five firms as the top purchasers of ironing tables: ***. Purchaser questionnaires were sent to these five firms and three firms, **, provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for ironing tables that have occurred in the United States or in the market for ironing tables in China since January 1, 2015?

Purchaser	Yes / No	Changes that have occurred
***	***	***
***	***	***
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for ironing tables in the United States or in the market for ironing tables in China within a reasonably foreseeable time?

Purchaser	Yes / No	Changes that have occurred
***	***	***
***	***	***
***	***	***

