



February 5, 2007

The Honorable Charles B. Rangel
Chairman
Committee On Ways And Means
1102 Longworth House Office Building
Washington D.C. 20515

Re: Public Comment On Proposed Modification to the U.S. Department of Commerce's
Calculation of Weighted Average Dumping Margins in Investigations

Dear Chairman:

On behalf of the Board of Directors of Consumers for World Trade (CWT), I am writing to express our support for efforts taken by the Department of Commerce to eliminate the practice of "zeroing" that unfairly raises prices for consumers, limits the range and availability of consumer products and violates our international trade obligations.

By way of background, CWT is a national, non-profit, non-partisan organization, established in 1978 to promote the consumer interest in international trade and to enhance the public's awareness of the benefits of an open, multilateral trading system to everyone's daily life. CWT is the only consumer group in America whose sole mission is to educate, advocate and mobilize consumers to support trade opening legislation.

As a consumer group, we strongly oppose the practice of "zeroing" which uses dubious mathematical procedures to levy unfairly high hidden taxes on American consumers and consuming industries. Not only do these duties inflate the price of finished products for the end user, they threaten the livelihoods of workers in industries that must import their intermediary inputs.

The use of "zeroing" when calculating dumping margins also violates our international trade commitments. Several World Trade Organization decisions have rejected the use of "zeroing" in applying anti-dumping margins. The continued use of the practice could lead our trading partners to apply high tariffs on U.S. exports as a punitive measure.

The Department of Commerce already maintains the statutory authority to abandon the practice of zeroing without authorizing legislation or regulation. In fact, as of December 27, 2006, the Department of Commerce has already begun to abandon the practice. Consumers for World Trade commends the Department of Commerce on this decision and urges continued abandonment of the use of “zeroing”.

We thank you for providing us with the opportunity to provide you and the Committee with our comments on the use of zeroing.

Yours truly,

Robin Lanier
Executive Director
Consumers for World Trade