STATEMENT OF LEONARD E. FINKEL, PRESIDENT, UMBRELLA FRAME ASSOCIATION OF AMERICA

Mr. Finkel. Mr. Chairman, gentlemen of the committee, my name is Leonard E. Finkel. I am chairman of the Finkel Umbrella Frame Co. and president of the Umbrella Frame Association of America.

In the brief time allotted to me, it is of course impossible to completely relate the problems of our industry to the subject under consideration by this committee. I can only hope to excite your interest so that you will give due consideration to the brief that has been filed with your committee by the Umbrella Frame Association of America.

This brief contains a description of the industry and its products, a history of our efforts to obtain relief from the problems of imports, trends in the industry in the United States and Japan, statistics of imports and domestic production derived from Government records generated by Government investigations and statistics compiled from individual company records certified by independent certified public accountants.

The facts of this case are well documented and are known in many places in the Government here in Washington. Our plight is familiar to the Department of Commerce. The Tariff Commission has listened to our pleas on three occasions. Committees of Congress, too, have had

the opportunity to hear our story.

I respectfully submit, therefore, that the evidence we have submitted may be accepted as fact. I further submit that our case is a classic textbook example of a situation that merits and justifies relief. It would follow that what has happened to our small industry has also happened or will soon happen to other small industries similarly situated or will soon happen and, therefore, this is a situation that deserves the consideration of your committee in and of itself and as a facet in the broad fabric of international trade which is presently

The industry about which I speak is the umbrella frame manufacturing industry. The problems cannot realistically be examined without considering conditions in the umbrella manufacturing industry as well. The frame industry makes the metal structure that supports the cover and sells it to the umbrella manufacturer who makes the cover

and assembles the cover and handle to complete the product.

Pursuant to section 405(4) of the Trade Expansion Act of 1962 we may consider frames and umbrellas together and evaluate the impact of imports of frames and umbrellas on the domestic producers of umbrella frames. The U.S. Tariff Commission accepted this principle in the proceedings initiated by the industries' application of January 9, 1964.

As it relates to the frame industry, this principle translates into the concept that every umbrella has a frame and a frame can only be

used in an umbrella.

A consideration of the statistical material appended to our brief-

reveals some very interesting and startling facts:

Startling fact No. 1: In 1954 the domestic manufacturers of umbrella frames produced 745,514 dozen umbrella frames. In the same year 717,233 dozens of umbrella frames were used to make domestic