

We agree that there are a number of separate industries embraced by the term "electronic industries". Thus, there is a consumer electronic products industry, a defense electronics products industry, and so forth, and to a large extent the products produced by one such electronic industry are commercially different from the products produced by the other electronic industries.

But all of the electronic industries have one thing in common: in producing the products they make they need electronic parts and components. And they obtain these needed parts and components from the U.S. producers of such parts and components.

The Parts Division does not disagree with the fundamental fact that the market served by U.S. producers of electronic parts and components embraces the entire output of all of the electronic industries. As they so succinctly state it—

"Electronic parts and components are the building blocks from which finished electronic products . . . are assembled."

Since electronic parts and components are indeed the building blocks from which *all* finished electronic products are assembled, then the economic state of the U.S. electronic parts and components industry can only be assessed by analyzing the overall condition of the total electronic industries of the United States. Just as the Parts Division bases its claim for quota relief on its interest in the fortunes of the consumer electronic industry, it has an equally important interest in the defense, space, and industrial electronic industries. It is somewhat disingenuous for the Parts Division to argue that only their interest in consumer products and components is relevant here. We submit that their entire interest—the totality of electronic industries—is the focal point for the economic analysis needed in assessing their claim of serious injury.

The steel industry analog used by the Parts Division is quite apt here, though their use of it is erroneous. Thus, they argue that when one analyzes import impact on the steel industry, he does not sweep: ". . . into the data every type of article made in this country which contains steel."

But this is precisely what is done. Any economic assessment of the impact of imports on the U.S. steel industry starts with an analysis of the output of U.S. steel mills *in toto*. Whether such steel is sold by the U.S. steel mills to the auto industry, to the ship-building industry, to one or more of the electronic industries or to a foreign buyer is beside the point. The pertinent consideration is the production of steel—and all steel production is taken into account at the threshold of the economic analytical process.

Thus, we accept the steel industry analog offered by the Parts Division. And just as total U.S. steel mill output is counted in any assessment of the impact of imports on the U.S. producers of steel, so also must the total output of the U.S. electronic parts and components industry be counted in any assessment of the impact of imports on that industry.

The relevant U.S. industry here, therefore, is the U.S. industry producing electronic parts and components. It is the economic status of this industry—measured by its total market, domestic and foreign—which is in issue.

THE RELEVANT OBJECTIVE DATA SHOW THAT THE U.S. ELECTRONIC PARTS AND COMPONENTS INDUSTRY NEEDS NO IMPORT QUOTA PROTECTION

The electronic industries of the United States, the users of the parts and components made by the U.S. manufacturers of such articles, sold some \$22.1 billion in goods last year and industry forecasts point to sales of over \$23 billion this year. The 1967 record level topped 1966's performance by some \$1.5 billion and was almost \$5 billion above 1965 sales.

These industries did equally well on the export side. Exports of \$1.15 billion in 1965 increased in 1966 to \$1.44 billion. Last year a record \$1.77 billion of U.S.-produced electronic articles were sold to foreign buyers.

The U.S. producers of parts and components participated fully in these ever-increasing domestic and foreign sales of electronic products. Thus, factory sales of electronic parts and components totalled \$5.48 billion in 1967, up 18 percent over 1965 sales of \$4.69 billion. The industry forecasts a rise in sales in 1968. Exports of components climbed steadily from \$328 million in 1965 to \$440 million in 1966 to a high of \$486 million last year. U.S. electronic parts and components producers enjoyed a favorable balance of trade in parts and components alone of \$217 million in 1965, \$266 million in 1966, and a record \$312 million last year.

These data do not show any injury whatsoever, much less the serious injury which must precede consideration of import quota protection. The electronic