95.1 percent, instead of the figures which appear on the table of page 6 of the importers' brief.

Those figures are correct in the importers' brief, but only insofar as they go. These are of particularly importance to us, because of the charges that have been made, that the changing guidelines did supposedly not effectuate a 35 percent cut in the tariff.

The Tariff Commission's own figures, I think, should make that issue a closed one, and the result of it very clear indeed.

(The table referred to follows:)

FOOTWEAR DUTIABLE ON THE BASIS OF THE AMERICAN SELLING PRICE, ITEM 700.60: RATIO OF CALCULATED DUTY TO EXPORT VALUE, BY TYPE OF FOOTWEAR, UNDER "NEW" GUIDELINES AND "OLD" GUIDLINES, BASED ON A SAMPLE OF IMPORTS IN 1965

Type of footwear	Quantity (thousand pairs)	Value		Unit value		Ratio of calculated duty to export value	
		Export (thousand dollars)	New ASP (thousand dollars)	Export	New ASP	New (percent)	Old (percent)
For men	1,112	1,072	2,726	$0.96	$2.45	50.8	78.1
For youths and boys	1,552	1,096	3,317	.71	2.14	60.5	100.5
For women and misses	3,366	1,831	5,526	.54	1.64	60.3	96.0
For infants and children	1,098	437	1,626	.40	1.48	74.4	120.0
Total or average	7,128	4,436	13,195	.62	1.85	59.5	95.1

Effect of Kennedy Round Negotiations on Rubber Footwear

Mr. COOPER. If I may return to my testimony, I would like to say that what I have said thus far summarized the broad context in which we urged Ambassador Roth and his colleagues to reserve both waterproof and canvas footwear from any cut in the Kennedy round.

In the course of a half-dozen hearings before the Tariff Commission and the trade information committee—and I might say this industry has been almost literally heard to death by the Tariff Commission. We have investigated and reinvestigated, and investigated once again. In the course of all of these hearings, we presented detailed financial, production, employment and import statistics, demonstrating the need for retention of existing rates and the ASP method of valuation. We disputed the Tariff Commission's recommended conversion of our ASP rate to a rate of 58 percent based on foreign value, and we demonstrated that such a conversion would provide less protection than our current 20 percent ASP. We pointed out that this industry has no export market and that the negotiation of ASP could not be accompanied by a reciprocal quid pro quo of any benefit to us. In the alternative we argued that, if ASP were negotiated, the industry should be given ample time to adjust to the change, that account should be taken of the marked increase in imports since 1965 from countries with costs even lower than Japan's (for example, Formosa and Korea), and that consideration should be given to the fact that new styles and products would not get the benefit of converted ASP rates.

The office of the special representative and all of the other interested Government agencies subjected the arguments and the statistics which both we and the importers presented to a thorough sifting and probing, and I think that is an understatement of the case. The result was that both waterproof and canvas footwear emerged from the