



United States International Trade Commission

Budget Justification

Executive Summary
Fiscal Year 2017



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Budget Highlights

For FY 2017, the Commission requests \$92.9 million to carry out our statutorily mandated functions. The FY 2017 request represents a \$4.0 million, or 4.5 percent, increase over the FY 2016 budget of \$88.8 million. The request is driven by the need to make essential investments in our human capital; economic research; and information technology (IT), cybersecurity, and infrastructure.

Proposed FY 2017 personnel costs account for about \$1.7 million of the increase over FY 2016 and reflect the increased resources needed to maintain critical FY 2016 staffing improvements and fund the cost of the proposed 1.6 percent pay raise effective January 1, 2017, normal costs for promotions and within-grade increases, and higher benefits costs. Our human capital strategy for FY 2017 focuses on keeping staffing at the levels needed to perform our statutory mission, given the challenges of high caseloads, several major ongoing trade negotiations to support, and new requirements set forth in the 2015 Trade Priorities and Accountability Act.

Proposed non-personnel expenses account for about \$2.3 million of the increase over FY 2016. This amount will pay for needed investments in information technology (IT) infrastructure, equipment, and cybersecurity that will help ensure a secure and efficient network. It will also fund our efforts to expand the research and economic analysis capabilities needed to support requested studies on trade negotiations and trade policy.

Lease Renewal

Our lease expires on August 10, 2017. We are working with the General Services Administration to finalize an occupancy agreement and prospectus that meet our space requirements. Of particular concern to us is achieving the best value for taxpayers and ensuring adequate space to maintain a public courtroom complex that meets our section 337 caseload and our requirements for hearings in antidumping and countervailing duty and international trade and industry competitiveness investigations. At this point, it is unclear whether the Commission will be able to remain at its current location, which is very near Congress, or be required to move to a new location in the greater metropolitan area. If we are required to move to a new location, we will likely incur additional renovation/build-out costs, which may be as much as \$42.7 million.

Program Overview

Antidumping/Countervailing Duty (AD/CVD) Investigations and Unfair Import Investigations (Section 337)

The Commission's trade remedy investigations caseload continues to grow in complexity; AD/CVD investigations remain high and unfair import investigations have stabilized. Our agency provides a venue for private sector firms to bring allegations of certain unfair and/or injurious trade practices involving imports before an independent, objective, and expert quasi-judicial government body.

AD/CVD caseload grows

Twelve new petitions were filed under Title VII of the Tariff Act of 1930 in FY 2015, somewhat higher than recent averages. These new filings, combined with ongoing investigations and reviews, resulted in 47 instituted and completed proceedings, the highest levels in the last five years. The majority of petitions filed during FY 2014 involved imports from a single country, with China being the predominant source. In contrast, eight of the twelve petitions filed in FY 2015 involved imports from multiple countries, ranging from two to eight. Domestic industries filing petitions in FY 2015 represented a range of products, including flat-rolled steel, tubular products, chemicals, paper, and ferroalloys.

During FY 2015, we continued to improve our electronic data collection and processing, streamlined questionnaires, and revised our process for collecting other investigative data. We have also increased the availability of web-based content and conducted a forum to collect input from practitioners on potential improvements in the hearing process. During FY 2016, we will continue these efforts to emphasize transparency and lessen the burden on participating parties and our staff. We also anticipate investing in the necessary technology and staff skillsets to develop and manage a database for more complete, timely, and accessible reporting of Title VII investigation information.

Unfair import investigations caseload

Our section 337 process offers a highly desired forum where parties may resolve disputes involving imports that allegedly infringe U.S. intellectual property (IP) rights. Our process provides a relatively quick resolution of matters that would usually involve more

protracted litigation in the U.S. district courts. In addition, it supplies unique relief in the form of exclusion of goods at the border. IP-intensive industries account for a large number of high-wage jobs in U.S. industries that generate a trade surplus. Our section 337 workload, while not at the peak level seen in FY 2011, is expected to remain steady. The range of technologies covered in these investigations is quite broad, encompassing such products as smartphones and other wireless devices, smart televisions, semiconductors, wireless headphones, fitness trackers, and other high tech and consumer products. Although section 337 investigations typically involve patent infringement allegations by private firms, the number of investigations based on trade secrets, an area of heightened concern for U.S. companies, the Administration, and Congress, is rising.

We continue to work to ensure that section 337 investigations are completed in a timely way, in line with congressional intent. After several years of putting in place the necessary staff and courtroom resources to handle the section 337 workload, we are now focusing on making the section 337 process more efficient and less costly for both the agency and litigants. Our efforts include rules changes, procedural pilot programs, and substantial investments over the past few years in our Electronic Document Information System (EDIS). Further, in FY 2016 we plan to implement electronic service of documents in EDIS. We have also developed a new, publicly available information system, 337Info, which places more detailed information before the public about investigations instituted since October 1, 2008. 337Info provides scheduling and staffing information for all these investigations, as well as information about the unfair acts alleged for each investigation, how the investigations were disposed of with respect to each party, and information about appeals.

EDIS and 337Info have enhanced management of the Commission's large volume of investigation-related materials and the transparency of our investigative process. These systems are also Open Data compliant, which furthers our efforts to improve the accessibility and usability of our data. Continued funding of these types of improvements will help us address the challenges of resolving section 337 matters in a timeframe that is consistent with congressional targets.

Tariff, Trade, and Competitiveness-Related Analysis and Information

Our agency provides the executive branch and Congress with objective analyses of significant trade issues of the day. We provide industry and economic analysis, tariff and trade information, and trade policy support through formal investigations and informal expert advice. Given our unique economic and trade expertise, we are able to offer leading-edge insights that support the

development of sound U.S. trade policy. We also maintain and update the Harmonized Tariff Schedule of the United States (HTS). U.S. Customs and Border Protection (CBP) relies upon the HTS to collect tariff revenues on imported goods and private firms use it to learn the current and future tariff amounts they will pay on imported goods. U.S. exporters and importers rely on our work in the World Customs Organization to ensure that global tariff product classification (“nomenclature”) is up to date and takes into account U.S. industry interests and changing patterns of trade.

We continue to develop new approaches in our industry and economic analysis

International trade touches nearly all sectors of the U.S. economy. As with section 337 and Title VII investigations, we must constantly develop and refine our capabilities to meet requests for increasingly complex analyses in emerging areas of international trade, trade policy, and competitiveness. When information is not available from other sources, we gather primary data to provide unique analysis of emerging issues, gathering this information through the use of surveys, for example. In other instances, our staff develops new tools or methodologies to craft high-quality economic analysis. As trade agreements have evolved, nontariff issues and concessions have become increasingly important to the analysis of the costs and benefits of such agreements. Determining the impact of such changes is considerably more challenging than examining tariff concessions. We are applying new modeling approaches in ongoing investigations examining the economic effects of the Trans-Pacific Partnership, previous U.S. trade agreements, and trade restrictions in Cuba. We also develop new capabilities by collaborating with other organizations or academic institutions. For example, in our recent investigation of the global rice market, we applied a specialized database and economic model that drew from the work of external experts in order to improve our analysis.

Our work in industry and economic analysis spans a wide variety of issues, including such areas as agricultural policies; global and regional value chains; and the effects of trade and investment barriers, rules of origin, and standards on U.S. businesses, consumers, and trade flows. Our reports also analyze new technologies, industries, and business models, examine the integration of goods and services in production and trade, and evaluate the impact of final offers made by foreign countries taking part in negotiations with the United States. To effectively support the interests of trade policy makers, we must maintain a staff with expert knowledge and skills who will be able to provide unique, relevant, and timely insights on new and fast-evolving sectors of the U.S. economy in the global marketplace.

Tariff and trade information services will benefit from new technology and improved business processes

The HTS provides the foundation for the U.S. trade data maintained by the U.S. Census Bureau (Census) and enables CBP to manage its trade and enforcement activities. We therefore ensure that the HTS is both accurate and up to date so that it meets the demands for trade and tariff information from Census and CBP, U.S. exporters and importers, the Administration, and policy makers in Congress. Due to the size and openness of the U.S. economy and the volume of U.S. trade, the HTS is the most heavily used tariff schedule in the world. Its more than 10,700 tariff lines must be updated and maintained throughout the year to reflect changes from trade agreement implementation and other congressional and Administration actions. Redesigned in FY 2013, this system was developed as an electronic database in FY 2014 and was made available to the public at the beginning of the fourth quarter of FY 2015. We are now redesigning the DataWeb and expect to make it available by the end of FY 2016. As with EDIS and 337Info, the HTS is, and the DataWeb will be, Open Data compliant.

As this makes clear, we respond to changing technology needs in tariff and trade information as well as current and anticipated resource gaps. The information is critical to our own analysis and provides much-needed information for the public. Our appropriation request includes funding to address these issues. The skills needed to support various components of tariff and trade information services (e.g., HTS maintenance, HTS classification, rules of origin assessments, and miscellaneous tariff bill assessments) are unique and can take years to develop. Moreover, many of the agency experts that we rely on for tariff and trade information services are now or soon will be eligible for retirement. We therefore expect human capital planning and recruitment to be a priority over the next few years.

Trade policy support may face resource constraints given the ambitious U.S. negotiating agenda

We draw heavily on staff in all agency program areas to respond to quick-turnaround informal requests on trade policy support from Congress and the Administration. In FY 2015, we provided over 100 rapid responses on a broad array of issues and topics, ranging from technical reviews of proposed laws to IP rights and technical barriers to trade. Our staff is providing technical support to negotiators working on the Information Technology Agreement, the Trans-Pacific Partnership, the Transatlantic Trade and Investment Partnership, the Environmental Goods Agreement, and the Trade in Services Agreement. We supply information, expertise, and software-based tools to support U.S. negotiating teams. Indeed, passage of the 2015 Trade Priorities and Accountability Act is expected to significantly increase the level of trade negotiating activity by the Administration, and consequently significantly increase the level of both informal and formal requests for data and analytical support from the agency.

We are also seeing increasing interest from our customers on nontariff-related trade matters, as well as the significant emerging tradable sectors such as services and digital trade. Moreover, behind-the-border issues related to regulation and services trade require us to refocus our resources, apply new analytic techniques, and develop new trade-related databases. Additionally, we regularly detail staff members to our main customers' offices, where they can support our customers' work while broadening their own skills and experience.

Our customers place a high value on staff's ability to produce objective and independent information and analysis on their most urgent issues. To the extent that we face heavier workloads, more complexity, and staffing challenges in various areas, our ability to respond to these requests will be limited. Staff development is thus a pressing need for us.

Efforts to Strengthen Information Technology Security

In FY 2017, we will continue to strengthen our security posture by investing in new technologies, processes, and capabilities to meet the requirements of the Federal Information Security Modernization Act of 2014. Improvements include:

- Expansion of our Information Security Continuous Monitoring (ISCM) efforts to monitor our network security, which we will achieve primarily by leveraging the Department of Homeland Security's (DHS) Continuous Diagnostics and Mitigation (CDM) Program resources;
- Continuing independent Security and Privacy Controls Assessments of our systems to ensure security controls are implemented correctly, operating as intended, and produce the desired outcome for security requirements; and
- Ensuring timely detection and reporting of cyber incidents

We made significant progress towards milestones for deploying Homeland Security Presidential Directive 12 (HSPD-12), which establishes a government-wide standard for authorized access to federally controlled facilities and networks. Also, our Trusted Internet Connection (TIC) implementation is under way and is scheduled for deployment in August 2016. The TIC will provide enhanced monitoring and situational awareness of our external network connections.

Senate Report 114-130: Cybersecurity Resources

Senate Report 114-130 instructs the Commission to "...prioritize efforts to improve its cybersecurity posture, and...encourages USITC to work with other relevant Federal agencies to inform its actions." Our FY 2017 budget request contains approximately \$1.8 million for cybersecurity resources. The current cybersecurity budget assumes we will use existing commercial products and tools to prevent, detect, and respond to security threats and vulnerabilities. About \$675,000 of the cybersecurity budget will be used to prevent malicious cyber activity by investing in security controls assessments via inter-agency agreement with the Department of Health and Human Services and ISCM via the DHS CDM program. USITC is coordinating with DHS for yearly use of their Risk and Vulnerability Assessment service, which includes penetration testing and e-mail phishing assessment.

Replication of headquarters data center capabilities offsite

In June 2015, the Commission began converting the disaster recovery site into the agency's primary data center and adding a second data center. Moving to an offsite data center is a private industry and government-wide best practice and is critical and time-sensitive for our agency, given the constraints of our building's power, telecommunications, and HVAC infrastructure.

Expanding the scope of the disaster recovery facility to manage 100 percent of the agency's functionality will address the above problems and mitigate ongoing risks. We anticipate achieving at least 80 percent replication of the agency's functionality at the disaster recovery facility by the end of FY 2016. Our FY 2017 budget request contains \$2.4 million for replication of the remaining 20 percent and to begin the procurement of a second offsite data center.

Risk Management, Planning, and Internal Control Efforts

Federal leaders and managers are responsible for establishing strategic goals and objectives, complying with relevant laws and regulations, managing risks, and creating sustainable value for stakeholders. To meet these responsibilities, management must establish, maintain, monitor, evaluate, and report on the agency's performance, risk management, and internal control processes.

Risk management processes should be forward-looking and designed to help the agency effectively plan, make good decisions, alleviate threats, seize opportunities, and meet agency goals and objectives. Internal control is the process used to help the agency

achieve its strategic goals and objectives concerning effective and efficient operations, reliable reporting, and compliance with laws and regulations.

During FY 2015, we completed the development of our enterprise risk management (ERM) framework, which identifies, prioritizes, and manages institutional risk at all levels of the agency. Moreover, agency managers are integrating ERM principles into their performance planning and budget formulation processes. As we further integrate enterprise risk management concepts into our strategic planning and budget processes, we will continue to improve our performance and decision making and better effectuate our strategic plan.

We also are committed to continuing our efforts to develop and maintain an effective system of internal control. Internal control management affects all areas of the organization at the agency-wide and office-specific levels, including our administrative, programmatic, IT, security, compliance, and financial activities. This system is expected to be a multiyear initiative that will incorporate ERM processes while transforming our management structure and culture.

We recognize the importance of, and made progress toward, establishing meaningful risk management and internal control programs over the past several years. The Commission adopted a number of practices to advance the agency's understanding and use of internal controls. Specifically, over the past several years, we introduced internal control into new and existing processes, and implemented annual evaluations of our office-level and agency-wide controls. We have also set annual performance goals designed to improve and reinforce internal controls.

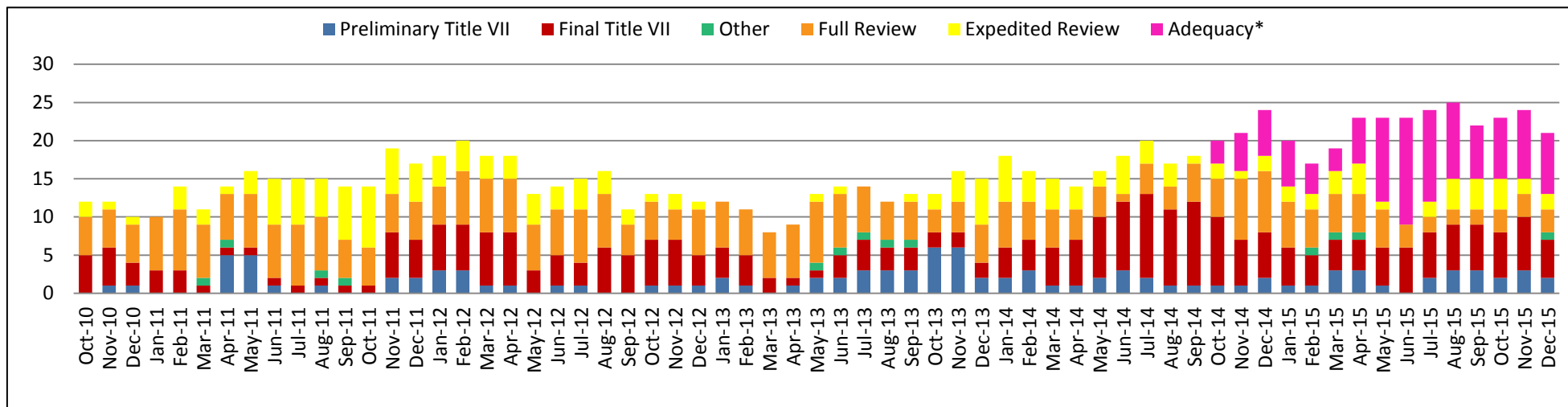
We are committed to improving our internal controls in the future, and will build upon the aforementioned organizational changes and enhanced internal control initiatives to make significant progress in this area in the years to come.

Import Injury Investigations Caseload

Instituted & Completed Investigations

	Instituted							Completed						
	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Estimate	FY 2017 Estimate	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Estimate	FY 2017 Estimate
Preliminary Title VII	8	8	13	9	12	11	10	8	7	9	13	11	13	10
Final Title VII	2	12	5	15	10	13	10	6	8	7	9	12	13	12
Other	2	0	1	0	1	2	1	2	0	1	0	1	2	1
Full Review	12	7	10	7	8	13	13	9	9	10	7	9	10	10
Expedited Review	19	9	9	11	16	11	12	12	17	3	15	14	12	15
Total	43	36	38	42	47	50	46	37	41	30	44	47	50	48

Monthly Active Caseload



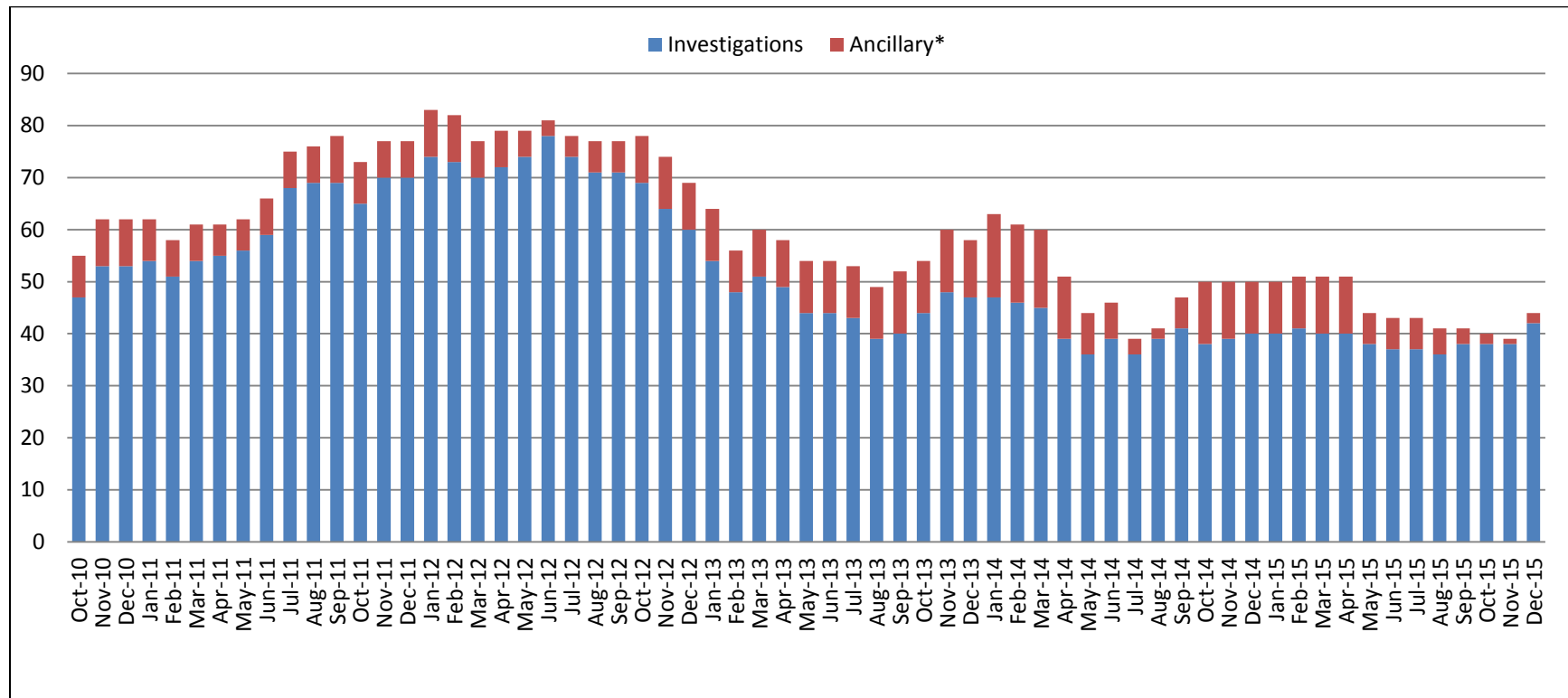
*The agency realigned its workload for five-year reviews in FY 2015, shifting a substantial portion of work to the adequacy phase of these proceedings, prior to a determination to conduct a full or expedited review. Beginning in FY 2015, active five-year reviews in their adequacy phase are presented separately and designated "Adequacy." See linked data set.

Unfair Import Investigations Caseload

Instituted & Completed Investigations

Status	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Estimate	FY 2017 Estimate
Instituted	78	56	52	49	47	47	47
Completed	58	57	72	59	50	48	48

Monthly Active Caseload



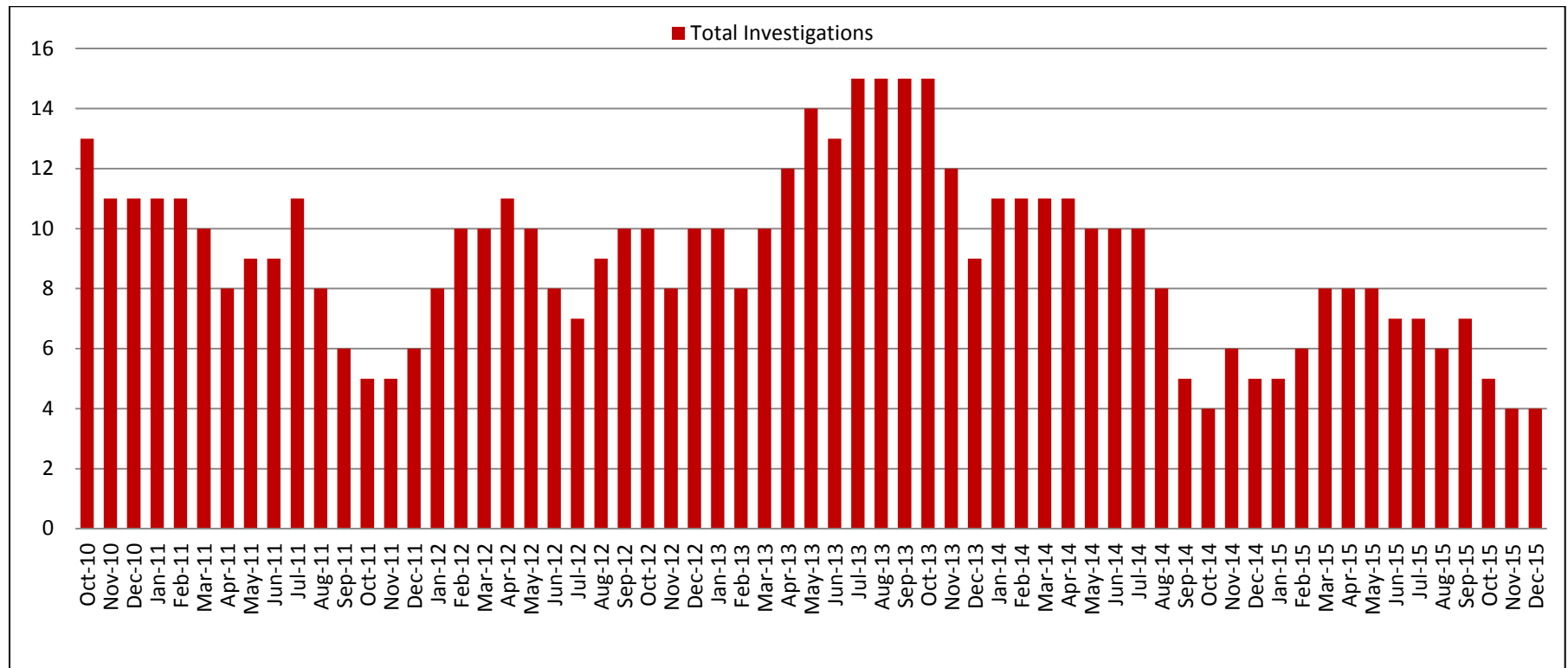
*Ancillary investigations include petitions for modifications and/or rescissions, requests for advisory opinions, Federal Circuit remands, or enforcement proceedings. See linked data set.

Industry and Economic Analysis Investigations Caseload

Instituted, Completed, & Active Recurring Investigations

Status	FY 2011 Actual	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Estimate	FY 2017 Estimate
Instituted	8	9	10	8	5	9	9
Completed	11	6	12	10	9	9	9
Active Recurring	8	6	8	7	6	6	6

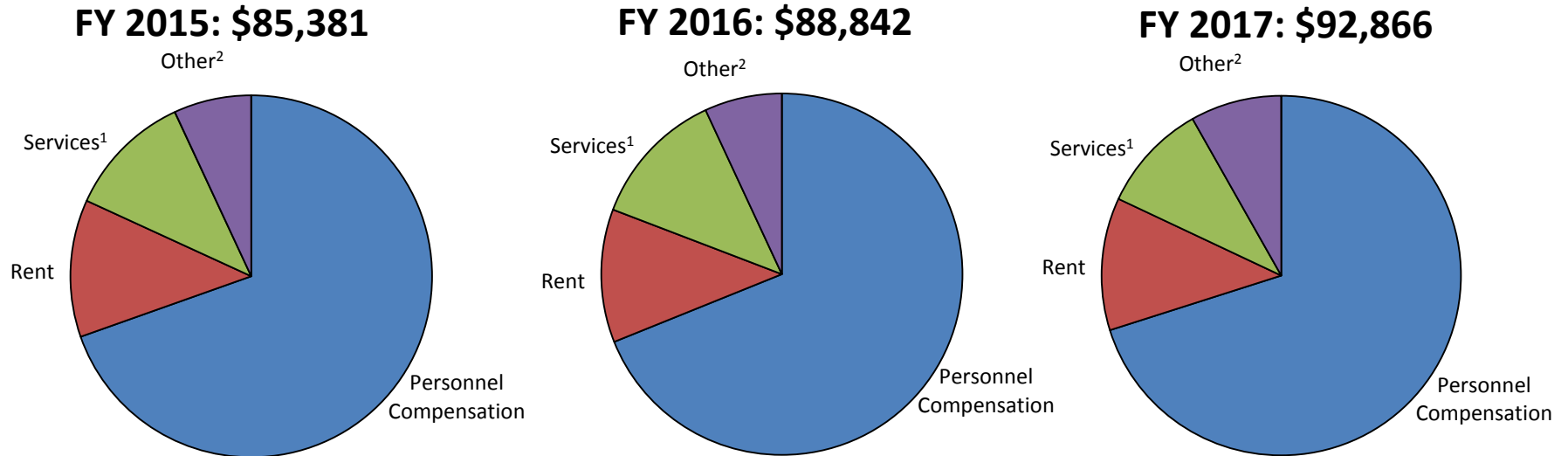
Monthly Active Caseload



See linked data set.

Dollar Cost: Comparison by Object Classification, Fiscal Years 2015-2017

(Dollar Amounts in Thousands)



CATEGORY OF OBLIGATION	FY 2015 Actual		FY 2016 Estimate		FY 2017 Request	
	Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Personnel Compensation	\$59,405	69.6%	\$62,266	70.1%	\$63,995	68.9%
Rent	10,470	12.3%	10,591	11.9%	11,045	11.9%
Services ¹	9,582	11.2%	8,693	9.8%	11,392	12.3%
Other ²	5,924	6.9%	7,292	8.2%	6,434	6.9%
TOTAL	\$85,381	100.0%	\$88,842	100.0%	\$92,866	100.0%

Note: Dollars may not add due to rounding in this and subsequent charts.

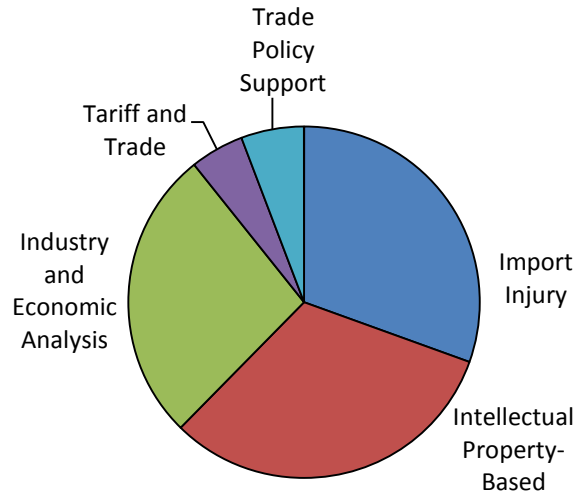
¹“Services” include, but are not limited to, obligations for contractor staff (IT service desk; security guards; financial management, internal controls, and financial audits), software licenses, and equipment maintenance.

²“Other” includes budget object classes such as equipment, supplies, communications and equipment rental, travel, training, printing and reproduction, land and structures, postage and contractual mail, and transportation.

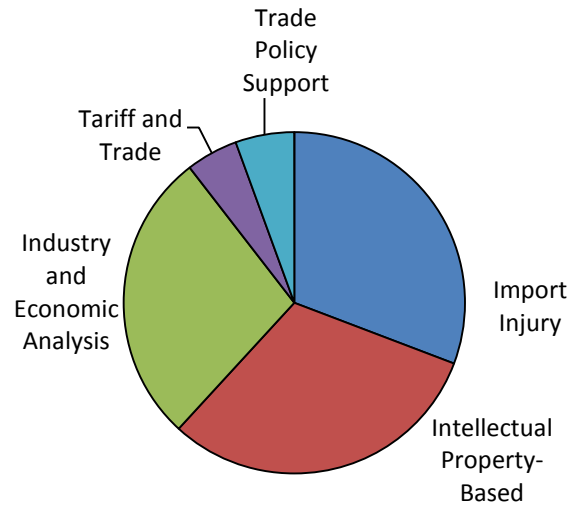
Dollar Cost: Comparison by Strategic Goal, Fiscal Years 2015-2017

(Dollar Amounts in Thousands)

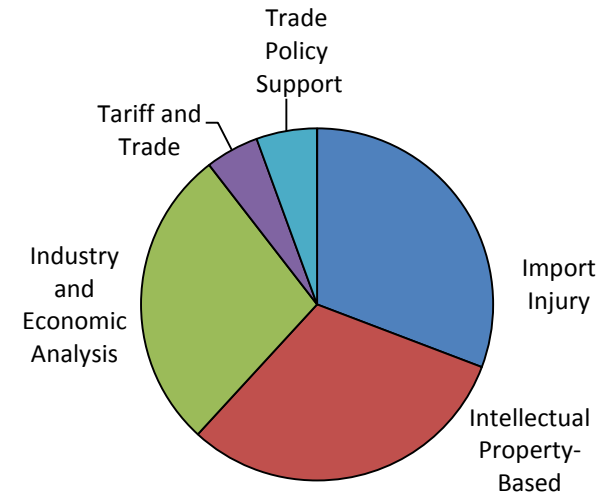
FY 2015: \$85,381



FY 2016: \$88,842



FY 2017: \$92,866



CATEGORY OF OBLIGATION	FY 2015 Actual		FY 2016 Estimate		FY 2017 Request	
	Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Trade Remedy Investigations (Strategic Goal 1)						
Import Injury	\$26,064	30.5%	\$27,357	30.8%	\$28,597	30.8%
Intellectual Property-Based	\$27,189	31.8%	\$27,577	31.0%	\$28,826	31.0%
Tariff, Trade, and Competitiveness-Related Analysis and Information (Strategic Goal 2)						
Industry and Economic Analysis	\$22,970	26.9%	\$24,597	27.7%	\$25,711	27.7%
Tariff and Trade Information Services	\$4,213	4.9%	\$4,363	4.9%	\$4,560	4.9%
Trade Policy Support	\$4,945	5.8%	\$4,948	5.6%	\$5,172	5.6%
TOTAL	\$85,381	100.0%	\$88,842	100.0%	\$92,866	100.0%

Analysis of Change by Object Classification, Fiscal Years 2015-2017

(Dollar Amounts in Thousands)

	FY 2015 Actual	FY 2016 Estimate	FY 2017 Request	FY 2016-2017 Change	Percentage Change
Personnel Compensation	\$59,405	\$62,266	\$63,995	\$1,729	2.8%
Non-personnel Obligations					
Rent	\$10,470	\$10,591	\$11,045	\$454	4.3%
Services	9,582	8,693	11,392	2,698	31.0%
Supplies	1,775	1,787	1,894	107	6.0%
Equipment	1,710	1,297	2,334	1,037	79.9%
Travel	423	579	525	-54	-9.3%
Training	659	540	520	-20	-3.8%
Communications and Equipment Rental	1,007	2,682	822	-1,860	-69.4%
Transportation	10	15	15	0	0.0%
Postage	71	44	44	0	0.0%
Land and Structures	0	0	0	0	0.0%
Printing and Reproduction	269	321	251	-70	-21.7%
Official Reception and Representation	1	27	29	2	8.5%
Subtotal Non-personnel Obligations	\$25,976	\$26,576	\$28,871	\$2,295	8.6%
Total Obligations	\$85,381	\$88,842	\$92,866	\$4,024	4.5%

Summary of Changes from the FY 2016 Estimate

Personnel Cost Change

(Dollar Amounts in Thousands)

Personnel Costs+\$1,729

Personnel costs are expected to increase by approximately \$1.7 million to maintain our expected FY 2016 year-end staffing levels and cover the proposed 1.6 percent pay raise effective January 1, 2017, the normal cost of promotions and within-grade increases, and higher benefits costs.

Non-Personnel Cost Changes

Rent.....+\$454

Rent costs are expected to increase by \$454,000 to accommodate higher real estate taxes and operating costs included in the leases.

Services.....+\$2,698

Services costs are expected to increase by \$2.7 million. We have additional cyber security requirements, will expand our economic research and modeling capabilities, and will enhance systems that support our unfair import and antidumping/countervailing duty investigations and the tariff, trade, and competitiveness-related analysis and information we provide the public and our stakeholders.

Supplies+\$107

Supplies costs are expected to increase by \$107,000 for data purchases to support research requirements.

Equipment+\$1,037

Equipment costs are expected to increase by approximately \$1.0 million. The largest component of this increase covers expenses for migrating to a primary offsite data center and standing up a second, backup data center.

Travel-\$54

Travel costs are expected to decrease slightly but travel will be sufficiently funded to support statutory investigations and anticipated studies, knowledge development in emerging trade issues and priority areas, representational travel for international organization meetings, litigation support, and multilateral and regional agreement negotiation support.

Training.....-\$20

Training costs are expected to decrease slightly but training will be sufficiently funded to support staff training to advance existing skills, licensing, certification, and professional education requirements for existing staff, and will enable the agency to train newly-hired staff.

Communications-\$1,860

Communications costs are expected to decrease by \$1.9 million as a result of one-time FY 2016 purchases related to the data center.

Printing and Reproduction.....-\$70

Printing and reproduction costs are expected to decrease by \$70,000 as a result of fewer submissions to the Government Publishing Office.

Official Reception and Representation.....+\$2

Official reception and representation funds are expected to increase by \$2,250, which has been the level of funding provided in the last several annual appropriations.

Net Non–Personnel Cost Changes+2,295

Total Adjustment to Base (\$88,842)+\$4,024

Total Budget Request..... \$92,866

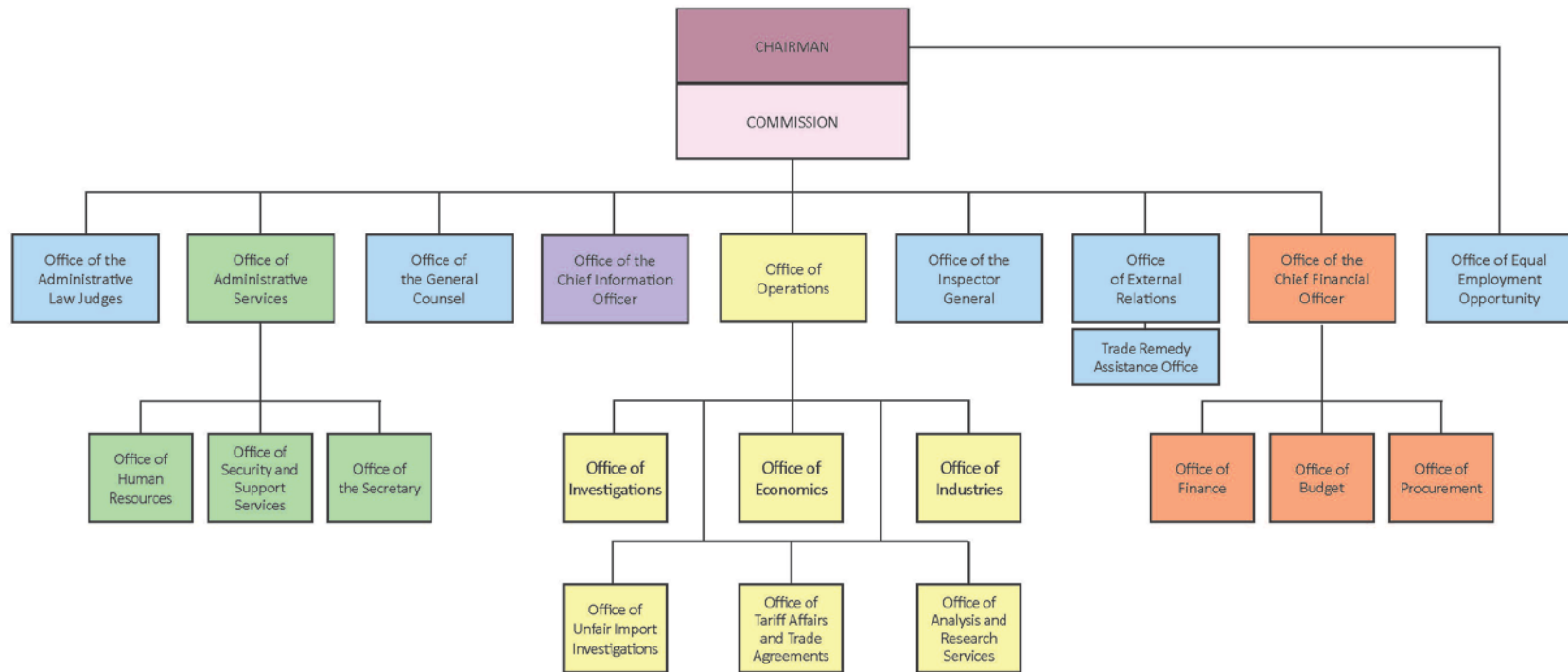
Commissioners

The USITC is headed by six Commissioners, who are nominated by the President and confirmed by the U.S. Senate. Meredith M. Broadbent, a Republican, is serving as Chairman of the USITC for the term ending June 16, 2016. Dean A. Pinkert, a Democrat, is serving as Vice Chairman. Commissioners currently serving are, in order of seniority, Irving A. Williamson, David S. Johanson, F. Scott Kieff, and Rhonda K. Schmidlein.

Each of the six Commissioners serves a term of nine years, unless appointed to fill an unexpired term. The terms are set by statute¹ and are staggered so that a different term expires every 18 months. A Commissioner who has served for more than five years is ineligible for reappointment. A Commissioner may, however, continue to serve after the expiration of his or her term until a successor is appointed and qualified. No more than three Commissioners may be members of the same political party. The Chairman and the Vice Chairman are designated by the President and serve for a statutory two-year term. The Chairman may not be of the same political party as the preceding Chairman, nor may the President designate two Commissioners of the same political party to serve as the Chairman and Vice Chairman. Currently three Democrats and three Republicans serve as Commissioners.

¹ 19 U.S.C § 1330, Organization of Commission.

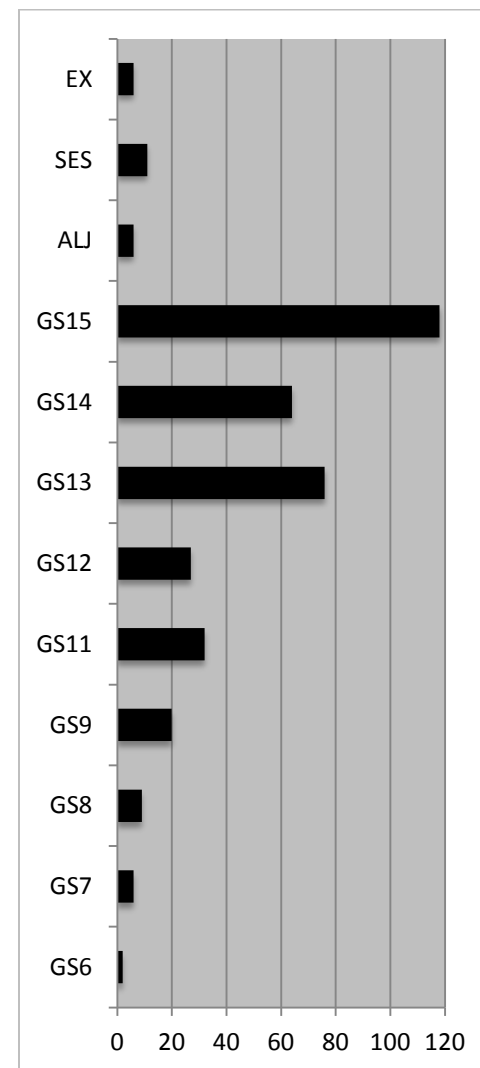
U.S. International Trade Commission Office-Level Organization Chart



Revised October 2014

Current Permanent and Term Staffing Plan with Onboard and Gaps

Office	FY 2016		
	Permanent and Term Positions in Staffing Plan	Permanent and Term On Board (as of Jan. 6, 2016)	Gap
Commissioners' Offices	32	31	1
External Relations	5	3	2
Inspector General	4	3	1
General Counsel	44	42	2
Administrative Law Judges	24	23	1
Equal Employment Opportunity	2	2	0
Chief Information Officer	31	34	-3*
Subtotal Independent Offices	142	138	4
Operations	7	6	1
Analysis and Research Services	20	18	2
Import Injury Investigations	27	20	7
Unfair Import Investigations	21	20	1
Economics	42	32	10
Tariff Affairs and Trade Agreements	14	14	0
Industries	84	65	19
Subtotal Operations	215	175	40
Chief Financial Officer	4	4	0
Budget	2	2	0
Finance	9	8	1
Procurement	6	6	0
Subtotal Chief Financial Officer	21	20	1
Administrative Services	5	7	-2*
Human Resources	9	10	-1*
Security and Support Services	11	11	0
Secretary and Dockets	16	16	0
Subtotal Administrative Services	41	44	-3*
Commission Total	419	377	42



*We constantly evaluate our workload and align resources to meet emergent needs. In the short term, the Commission may approve requests for staffing that exceed office allocations to meet workload challenges. If those workload challenges persist, the Commission may make the adjustment permanent by shifting positions, subject to the total staffing constraint of 419 permanent and term positions. See linked data set.



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