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**PUBLIC VERSION**

**VIA ELECTRONIC FILING:**

The Honorable Penny S. Pritzker  
Secretary of Commerce  
Enforcement and Compliance  
Room 1870  
U.S. Department of Commerce  
14th Street and Constitution Avenue, NW  
Washington, DC 20230

**VIA HAND DELIVERY:**

Lisa R. Barton, Secretary  
U.S. International Trade Commission  
Room 112A  
500 E Street, SW  
Washington, DC 20436

**Re: Petition for the Imposition of Antidumping Duties on  
Large Residential Washers from the People's Republic of China**

Dear Secretary Pritzker and Secretary Barton:

On behalf of Whirlpool Corporation ("Petitioner" or "Whirlpool"), enclosed please find a petition requesting the imposition of antidumping duties on imports of large residential washers

from Korea, on February 15, 2013.<sup>9</sup> These orders remain in place, but their effectiveness has been substantially nullified by the decision of Samsung and LG to relocate production of LRWs to China.

### III. SCOPE OF INVESTIGATION AND DESCRIPTION OF THE MERCHANDISE

#### A. Scope of Investigation and Tariff Classification

The products covered by this petition are all large residential washers and certain parts thereof from the People's Republic of China.

For purposes of this petition, the term "large residential washers" denotes all automatic clothes washing machines, regardless of the orientation of the rotational axis, with a cabinet width (measured from its widest point) of at least 24.5 inches (62.23 cm) and no more than 32.0 inches (81.28 cm), except as noted below.

Also covered are certain parts used in large residential washers, namely: (1) all cabinets, or portions thereof, designed for use in large residential washers; (2) all assembled tubs<sup>10</sup> designed for use in large residential washers which incorporate, at a minimum: (a) a tub; and (b) a seal; (3) all assembled baskets<sup>11</sup> designed for use in large residential washers which

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<sup>9</sup> See *Final Determination; Large Residential Washers From Mexico and the Republic of Korea: Antidumping Duty Orders*, 78 Fed. Reg. 11,148 (Feb. 15, 2013); *Large Residential Washers From the Republic of Korea: Countervailing Duty Order*, 78 Fed. Reg. 11,154 (Feb. 15, 2013).

<sup>10</sup> A "tub" is the part of the washer designed to hold water.

<sup>11</sup> A "basket" (sometimes referred to as a "drum") is the part of the washer designed to hold clothing or other fabrics.

incorporate, at a minimum: (a) a side wrapper;<sup>12</sup> (b) a base; and (c) a drive hub;<sup>13</sup> and (4) any combination of the foregoing parts or subassemblies.

Excluded from the scope are stacked washer-dryers and commercial washers. The term “stacked washer-dryers” denotes distinct washing and drying machines that are built on a unitary frame and share a common console that controls both the washer and the dryer. The term “commercial washer” denotes an automatic clothes washing machine designed for the “pay per use” segment meeting either of the following two definitions:

(1) (a) it contains payment system electronics;<sup>14</sup> (b) it is configured with an externally mounted steel frame at least six inches high that is designed to house a coin/token operated payment system (whether or not the actual coin/token operated payment system is installed at the time of importation); (c) it contains a push button user interface with a maximum of six manually selectable wash cycle settings, with no ability of the end user to otherwise modify water temperature, water level, or spin speed for a selected wash cycle setting; and (d) the console containing the user interface is made of steel and is assembled with security fasteners;<sup>15</sup> or

(2) (a) it contains payment system electronics; (b) the payment system electronics are enabled (whether or not the payment acceptance device has been installed at the time of importation) such that, in normal

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<sup>12</sup> A “side wrapper” is the cylindrical part of the basket that actually holds the clothing or other fabrics.

<sup>13</sup> A “drive hub” is the hub at the center of the base that bears the load from the motor.

<sup>14</sup> “Payment system electronics” denotes a circuit board designed to receive signals from a payment acceptance device and to display payment amount, selected settings, and cycle status. Such electronics also capture cycles and payment history and provide for transmission to a reader.

<sup>15</sup> A “security fastener” is a screw with a non-standard head that requires a non-standard driver. Examples include those with a pin in the center of the head as a “center pin reject” feature to prevent standard Allen wrenches or Torx drivers from working.

operation,<sup>16</sup> the unit cannot begin a wash cycle without first receiving a signal from a bona fide payment acceptance device such as an electronic credit card reader; (c) it contains a push button user interface with a maximum of six manually selectable wash cycle settings, with no ability of the end user to otherwise modify water temperature, water level, or spin speed for a selected wash cycle setting; and (d) the console containing the user interface is made of steel and is assembled with security fasteners.

Also excluded from the scope are automatic clothes washing machines that meet all of the following conditions: (1) have a vertical rotational axis; (2) are top loading;<sup>17</sup> (3) have a drive train consisting, *inter alia*, of (a) a permanent split capacitor (PSC) motor,<sup>18</sup> (b) a belt drive,<sup>19</sup> and (c) a flat wrap spring clutch.<sup>20</sup>

Also excluded from the scope are automatic clothes washing machines that meet all of the following conditions: (1) have a horizontal rotational axis; (2) are front loading;<sup>21</sup> and (3) have a drive train consisting, *inter alia*, of (a) a controlled induction motor (CIM),<sup>22</sup> and (b) a belt drive.

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<sup>16</sup> “Normal operation” refers to the operating mode(s) available to end users (*i.e.*, not a mode designed for testing or repair by a technician).

<sup>17</sup> “Top loading” means that access to the basket is from the top of the washer.

<sup>18</sup> A “PSC motor” is an asynchronous, alternating current (AC), single phase induction motor that employs split phase capacitor technology.

<sup>19</sup> A “belt drive” refers to a drive system that includes a belt and pulleys.

<sup>20</sup> A “flat wrap spring clutch” is a flat metal spring that, when engaged, links abutted cylindrical pieces on the input shaft with the end of the concentric output shaft that connects to the drive hub.

<sup>21</sup> “Front loading” means that access to the basket is from the front of the washer.

<sup>22</sup> A “controlled induction motor” is an asynchronous, alternating current (AC), polyphase induction motor.

Also excluded from the scope are automatic clothes washing machines that meet all of the following conditions: (1) have a horizontal rotational axis; (2) are front loading; and (3) have cabinet width (measured from its widest point) of more than 28.5 inches (72.39 cm).

The products subject to this petition are currently classifiable under subheadings 8450.20.0040 and 8450.20.0080 of the Harmonized Tariff System of the United States (HTSUS). Products subject to this petition may also enter under HTSUS subheadings 8450.11.0040, 8450.11.0080, 8450.90.2000, and 8450.90.6000. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise subject to this petition is dispositive.

## **B. Physical Characteristics and Uses**

This petition covers large residential washers, which are typically purchased by households for use in a single-family dwelling. All LRWs are used to clean fabrics using water and detergent in conjunction with wash, rinse, and spin cycles. This section explains certain physical characteristics and attributes of the LRWs covered by this petition.

### **1. Configuration**

LRWs, as defined above, are generally produced and sold in two common configurations: vertical axis (top load) and horizontal axis (front load). Top load (“TL”) LRWs are loaded with laundry through a door in the top of the unit and contain a basket that spins on a vertical axis. Front load (“FL”) LRWs are loaded with laundry through a door at the front of the unit and contain a drum that spins on a horizontal axis. One U.S. producer — Staber — produces a top load washer with a horizontal axis.<sup>23</sup>

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<sup>23</sup> See Exhibit 4.

## 2. Clothes Moving Devices for TL Washers

TL washers commonly utilize either an impeller or an agitator, or a hybrid design, to move the clothes during the wash cycle. These mechanisms clean clothes by moving them through detergent and water.

An impeller is a rotating hub and does not possess a center post. The impeller creates turbulent currents in the wash water as the impeller rotates and these currents move the clothes through the water. Without the center post, impellers occupy less space in a washer and therefore impeller-based models tend to have a higher capacity than agitator-based models.

An agitator has a center post that projects from the bottom of the wash basket. The agitator is usually equipped with fins or vanes and creates the wash action by rotating back and forth. As the pole occupies a portion of the interior volume of the washer, TL washers with a traditional or “conventional” agitator often have capacities on the lower end of the spectrum.

As water efficiency requirements have grown more stringent, and “deep fill” cycles are less prevalent, manufacturers are utilizing “agi-pellers” or “HE agitators” in lieu of conventional agitators. This hybrid design has a center post like the traditional agitator (but without the fins/vanes), and moves the clothes more like an impeller.

## 3. Energy Efficiency

In the United States, energy efficiency standards for LRWs are promulgated by three entities: the U.S. Department of Energy (“DOE”), the U.S. Environmental Protection Agency (“EPA”), and the Consortium for Energy Efficiency (“CEE”).<sup>24</sup> DOE promulgates federal minimum standards for LRWs by reference to a washer’s Integrated Modified Energy Factor

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<sup>24</sup> *Final Determination* at I-13. The CEE is a nonprofit agency that encourages greater adoption of energy efficient products through various initiatives.

(“IMEF”) and Integrated Water Factor (“IWF”). EPA and DOE also establish more stringent IMEF and IWF standards for Energy Star qualification, while CEE establishes IMEF and IWF specifications for CEE Tier 1, Tier 2, or Tier 3 washers, with Tier 3 reserved for the most efficient washers.

In the past, including during the period of investigation in *Large Residential Washers from Korea and Mexico*, TL washers with an impeller were generally considered to be “high efficiency” (“HE”) machines insofar as they used HE detergent and qualified as Energy Star. At that time, the specifications for Energy Star and CEE Tier 1 were equivalent, though many TL washers with an impeller exceeded those specifications and qualified as CEE Tier 2 or Tier 3. By contrast, TL washers with a “conventional” agitator were not generally considered HE machines insofar as they used non-HE detergent and typically did not qualify as Energy Star or CEE Tier 1.<sup>25</sup>

On March 7, 2015, the DOE implemented new federal standards for all washers. These new regulations led to more stringent IMEF and IWF Energy Star specifications.<sup>26</sup> With these changes, Energy Star for TL washers and CEE Tier 1 are no longer equivalent, as CEE Tier 1 criteria are more stringent than Energy Star.<sup>27</sup> Indeed, many impeller-based TL washers no longer meet even CEE Tier 1 classification. Under this new regulatory regime, there is a much weaker correlation between the energy efficiency of TL washers and the presence of an agitator

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<sup>25</sup> *Id.* at 6.

<sup>26</sup> See *Energy Conservation Program: Energy Conservation Standards for Residential Clothes Washers*, 77 Fed. Reg. 59,719 (Oct. 1, 2012); *Energy Conservation Program: Energy Conservation Standards for Residential Clothes Washers*, 77 Fed. Reg. 32,308 (May 31, 2012).

<sup>27</sup> For front load washers, the criteria for Energy Star and CEE Tier 1 remain equivalent.

or impeller in the washer. Certain impeller-based models are no longer Energy Star qualified, while several agitator models (produced by GE) have earned the Energy Star rating. These new energy regulations prompted Whirlpool to redesign all of its entry-level top load washers to include an agi-peller (“HE-agitator”) rather than a “conventional” agitator.<sup>28</sup> In addition, most TL washers, including Whirlpool’s HE-agitator based washers, now utilize a more efficient “shallow fill” technology for their standard water level settings.<sup>29</sup>

In light of these commercial realities, Whirlpool does not consider washers to be “high efficiency” or “HE” by reference to whether they are Energy Star rated or rated under a given CEE tier. Rather, Whirlpool uses the terms “high efficiency” or “HE” to describe washers that are designed to use HE detergent (*i.e.*, a detergent specifically formulated to perform in low water level settings). At present, Whirlpool considers all of its washers – whether FL or TL – to be “high efficiency” because they are all designed to be used with high efficiency detergent for best results. In Whirlpool’s view, whether a washer is rated as Energy Star compliant is the most relevant indicator of a washer’s overall “efficiency.”

#### **4. Drive System**

LRWs are powered by either a belt drive system or a direct drive system, with different types of motors used to power each. Belt drive systems utilize decades-old technology whereby a motor powers a network of belts and pulleys that internally operates the gears and powers the wash unit. TL washers with a belt drive system are generally powered by a permanent split

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<sup>28</sup> Whirlpool washers with an HE agitator do not currently qualify as Energy Star.

<sup>29</sup> “Deep fill” continues to be an alternative cycle option on many models.



capacitor (PSC) motor,<sup>30</sup> while FL washers typically use a controlled induction motor (CIM)<sup>31</sup> to power the belt-drive system. The belt drive system, whether powered by a PSC motor or CIM motor, is a lower cost option and more prevalent at the lower end of the washer product lineup.

A direct drive system is a more modern technology and has a number of advantages over the belt drive system. Direct drive washers are much simpler in their construction. In a direct drive system, the tub is directly coupled with the operating motor, greatly reducing the number of parts that may wear down, reducing noise emission, and increasing energy performance.<sup>32</sup> A brushless permanent magnet (BPM) motor powers the direct drive system. An inverter controls the motor speed so the weight of the load is sensed and power output is adjusted accordingly. Because direct drive systems, and the BPM motors they utilize, are more expensive than belt drive systems, they are more prevalent at the higher end of the washer product lineup.

## **5. Other Features**

LRWs are equipped with other various features, including capacity, water heaters, steam cycles, glass lids, and cabinet finish (*e.g.*, color).<sup>33</sup> Capacity refers to the internal capacity of

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<sup>30</sup> As noted above, a “PSC motor” is an asynchronous, alternating current (AC), single-phase induction motor that employs split phase capacitor technology.

<sup>31</sup> As noted above, a “controlled induction motor” is an asynchronous, alternating current (AC), polyphase induction motor.

<sup>32</sup> A direct drive system is typically more efficient, as the power is not wasted in friction from the belt.

<sup>33</sup> See *Final Determination* at I-12-13.

the washer and thus the amount of clothes an LRW can wash per load.<sup>34</sup> A washer with an internal heater compensates for heat loss in the pipes and during the wash cycle, thus maintaining a consistent water temperature throughout the cycle. Other washers utilize an additional heater to raise the water temperature to a level that generates steam. The steam is then delivered into the machine's tub during the wash cycle. Other aesthetic features — such as a clear or tinted lid made of glass or plastic material (for top load washers) or color cabinets — entail additional manufacturing cost and, therefore, should command a price premium with purchasers.

## 6. Excluded Washers

The petition excludes “compact” washers with a cabinet width less than 24.5 inches, which would typically be used in a mobile home or small apartment,<sup>35</sup> as well as large washers with a cabinet width greater than 32.0 inches that would commonly be used in commercial or industrial settings.<sup>36</sup> The large residential washers at issue are those that use water and a detergent as the vehicle for cleaning fabrics, not dry cleaning machines.

Certain washers that are sized appropriately for household use, but are tailored for the laundromat trade, are also excluded from the scope of the petition. Laundromat operators seek simple, rugged washers that are payment system enabled and resistant to theft. Laundromat operators often limit the customer's ability to use more hot water than necessary in order to

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<sup>34</sup> For a description of the methodology for measuring and reporting washer capacity, *see infra* at n.43.

<sup>35</sup> *See Exhibit 5.*

<sup>36</sup> *See Exhibit 6.* The scope also excludes FL washers with a cabinet width greater than 28.5 inches. Because of size limitations in most homes, these washers represent a very small percentage of total washers sold in the United States.

control operating expenses. Such commercial washers may be purchased for use in apartment and dormitory laundry rooms. Petitioner has specified physical characteristics that are readily identifiable and unambiguously characterize washers as destined for the pay-per-use trade.

While LRWs are occasionally sold with matching dryers, this petition covers only LRWs. “Combination washer/dryer” machines purport to perform both the wash and dry functions in a single cabinet.<sup>37</sup> The essential character of such units is that of a washer, as the design and construction of these units are primarily driven by the wash-related systems (*e.g.* water inlets and pumps, dispensers, and motor and drive system). Accordingly, such units are to be included in the scope of the petition. On the other hand, washer-dryer units that (a) separate the washing function from the drying function in separate tubs/drums, but (b) integrate the user interface in a single console (“stacked washer-dryers”) serve a niche segment (*e.g.* small apartment dwellings) and are excluded from the scope of the petitions.<sup>38</sup>

Other product scope exclusions reflect designs for residential washers that are not currently produced in the United States. *First*, Petitioner is excluding top load washers that contain all of the following: PSC motor, belt drive system, and a flat wrap spring clutch.<sup>39</sup> *Second*, Petitioner is excluding front load washers that contain both a controlled induction motor and a belt drive system.<sup>40</sup> *Finally*, Petitioner is excluding front load washers with a

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<sup>37</sup> See **Exhibit 7**.

<sup>38</sup> See **Exhibit 8**.

<sup>39</sup> Such excluded washers include Haier models RWT360BW, GWT460BW, GWT480BW, GWT560BW. See **Exhibit 9**.

<sup>40</sup> Such excluded washers include GE models GFWN1100HWW, GFWH1200DWW, GFWH1200HWW, GFWH1400DWW, and GFWS1500DWW, GFWN1600JWW, GFWS1700HWW, and GFWS1705HDG, which are produced by Midea. See **Exhibit 10**.

cabinet width more than 28.5 inches.<sup>41</sup> The purpose of these exclusions is to ensure that Whirlpool is not overreaching in seeking coverage of models that are not offered for sale from domestic producers.

### C. Manufacturing Process

The manufacture of large residential washers is organized into several sub-system manufacturing processes involving a wide variety of materials. Some materials are purchased in bulk, others are purchased as cut, shaped, or painted pieces, and others are purchased as component systems. Ultimately, the various components are brought together on an assembly line, and the finished unit is then tested and packed for shipment.

Whirlpool recognizes nine modules in a large residential washer. They consist of the: (1) cabinetry (including top, lid, and door); (2) drive system; (3) wash system; (4) control system; (5) exterior features; (6) interior features; (7) literature; (8) labels; and (9) packaging. The components for each module originate within five areas in Whirlpool's plant, including: (1) materials receiving; (2) cabinet forming; (3) fabrication support; (4) plastics forming; and (5) machining. Different producers may organize their components and assemblies in different departments, but ultimately the technology and processes they employ are the same.

The materials department receives all purchased raw materials, including pre-stamped blanks, electrical subassemblies, injection molded parts, printed literature and labels, and packaging materials. The material department then maintains inventories and delivers materials to the appropriate fabrication department or to the assembly line.

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<sup>41</sup> Such excluded washers include Samsung models WF56H9100AW, WF56H9110CW, and WF56H9100AG. See **Exhibit 11**.

applied manually before the unit is automatically shrink-wrapped or automatically packaged in a corrugated box. The completed unit is then shipped to a distribution center.

**D. Channels of Distribution**

Virtually all LRWs are sold to distributors, such as retailers, and only a small percentage of LRWs are sold directly to end users. Subject merchandise, and the domestic like product, are all sold through the same channels of distribution.

**IV. CHINESE PRODUCERS AND EXPORTERS OF SUBJECT MERCHANDISE**

**A. Samsung**

Samsung is a Korean *chaebol* that produces large residential washers in China at its two manufacturing facilities in Suzhou Industrial Park in Jiangsu Province. Suzhou Samsung Electronics Co. Ltd. operates one facility (“Samsung Plant 1”), while Samsung Suzhou Electronics Export Co. Ltd. operates the other facility (“Samsung Plant 2”). The addresses of Samsung’s operations in China are:

Suzhou Samsung Electronics Co. Ltd.  
No. 501, Suhong East Road, Xuni Town, Pingjiang District  
Suzhou, Jiangsu 21500  
China  
Phone: 0512-62581234  
Fax: 0512-62583755  
[www.samsung.com.cn](http://www.samsung.com.cn)

Samsung Suzhou Electronics Export Co. Ltd.  
Jiepu Road No.218, Sipac  
Suzhou Industrial Park  
Suzhou, Jiangsu 21502-1  
China  
Phone: 0512-62581234  
Fax: 0512-62583755  
[www.samsung.com.cn](http://www.samsung.com.cn)

**B. LG**

LG is also a Korean *chaebol* that produces large residential washers at its production facility in Nanjing, Jiangsu Province. The contact information for LG's operation in China is:

Nanjing LG Panda Appliances Co. Ltd.  
 No 28, Yongfeng Road, Zijin (Baixia) High-tech Zone  
 Nanjing, Jiangsu 210007  
 China  
 Phone: 025-87706000  
 Fax: 025-84872931  
 www.lge-panda.com

**C. Other Producers**

While there are other Chinese producers of non-subject washers, based upon Whirlpool's information and belief, there are no other Chinese producers of the merchandise under consideration, whether for export to the United States or for sale in other countries.

## **V. PRODUCERS AND EXPORTERS OF NON-SUBJECT LARGE RESIDENTIAL WASHERS**

There are several other washer manufacturers in China, but based upon Petitioner's information and belief, none of these companies manufacture the merchandise under consideration. Producers of these out-of-scope washers, and their contact information, are set forth below:

### **1. Hisense – Whirlpool (Zhejiang) Electric Appliances Co., Ltd.**

Ian Lee  
 North Side, Zhong Yang Road, Changxing Economic Development Zone  
 Huzhou, Zhejiang 313100  
 China  
 Phone: 8621-61692888  
 Fax: 8621-61906518  
 Ian\_Lee@whirlpool.com  
 www.hisense.cn

**2. Whirlpool (China) Co., Ltd.**

Ian Lee  
No 96, Kexue Road, High tech Zone  
Hefei, Anhui 230088  
China  
Phone: 8621-61692888  
Fax: 8621-61906518  
Ian\_Lee@whirlpool.com  
www.whirlpool.com.cn

**3. Haier Group**

Ruimin Zhang  
Haier Industry Zone, High-tech Zone  
Qingdao, Shangdong 266101  
China  
Phone: 4006999999  
Fax: 0532-88938459  
9999@haier.com  
www.haier.com

**4. Midea Group Co., Ltd.**

Hongbo Fang  
No. 6 Midea Road, Beijiang Town, Shunde District  
Foshan, Guangdong 528311  
China  
Phone: 0757-26338888  
Fax: 0757-26654011  
webmail@midea.com.cn  
global.midea.com.cn

**5. Wuxi Little Swan Co., Ltd.**

Hongbo Fang  
No.18 South Changjiang Rd., New District, Wuxi China  
Wuxi, Jiangsu 214028  
China  
Phone: 0510-83704003  
Fax: 0510-83705002  
service@midea.com.cn  
<http://www.littleswan.com>

**6. Panasonic Appliances Washing Machine (Hangzhou) Co., Ltd.**

Osawa Hidetoshi  
No 6, Songqiao Road, Economic & Tech Development Zone  
Hangzhou, Zhejiang 310018  
China  
Phone: 0571-81632805  
Fax: 0571-81632811  
osawahidetoshi@panasonic.com  
www.panasonic.cn

**7. BSH Electrical Appliances (Jiangsu) Co., Ltd.**

Jianrong Tang  
No.208 Yaoxin Road (No.1 Ximenzi Road)  
Nanjing, Jiangsu 210046  
China  
Phone: 025 8543 9988  
Fax: 025 8566 3777  
corporate.communications@bshg.com  
<http://bsh-group.com/>

**8. BSW Household Appliances Ltd.**

Tu Jin  
No. 3 Wang Zhuang Road  
Wuxi, Jiangsu 214028  
China  
Phone: 86 51 0521 8888  
Fax: 86 51 0521 5169  
corporate.communications@bshg.com  
<http://bsh-group.com/>

**9. Shangdong Xiaya Group**

Youzhi Zhou  
No 51, South Gongye Road, Lixia District  
Jinan, Shandong 250101  
China  
Phone: 400-0507-666  
Fax: 0531-83122518  
xiaoya@xiaoyagroup.com.cn  
www.xiaoyagroup.com.cn



**10. Shanghai Hitachi Household Appliances Co., Ltd.**

Jianfang Shen  
No 1100, Jinxiang Road, Jinqiao Area, Pudong District  
Shanghai, Shanghai 201206  
China  
Phone: 021-50316868  
Fax: 021-51782100  
shha@hitachi-shha.com.cn  
www.hitachi-shha.com.cn/

**11. Changzhou Beko Appliance Co., Ltd.**

Ginobili Yu  
No 9, West Xinke Road, Luoyang Town, Wujin District  
Changzhou, Jiangsu 213104  
China  
Phone: 0519-88790169  
Fax: 0519-88790169  
Ginobili.yu@beko.com  
www.beko.com.cn

**12. Shandong Little Duck Electric Appliance Co., Ltd.**

Yang Yongxin  
44 Gongye Bei Road  
Jinan City, Shandong Province, 250101  
China  
Phone: 86 531 88696216  
Fax: 86 531 88696221  
Jn\_yongxin@126.com  
www.washerfridge.com

**13. Jinling Electric Co., Ltd.**

Beppe Fumagalli  
No 162, Jiangcui Road, Hushan Town, Jianghai District  
Jiangmen, Guanddong 529000  
China  
Phone: 0750-3811611  
Fax: 0750-3817625  
jinling@jinling.com  
http://en.jinling-jec.com/

**14. Ningbo Xinle Household Appliances Co., Ltd.**

Shengkang Hua  
No 128, Dahetou Road, Haishu District  
Ningbo, Zhejiang 315000  
China  
Phone: 0574-87491486  
Fax: 0574-87494954  
marketing@xinle.com  
<http://xinlehousehold.appliances-china.com/>

**VI. U.S. IMPORTERS OF LARGE RESIDENTIAL WASHERS**

The only known U.S. importers of LRWs from China are Samsung Electronics America, Inc. and LG Electronics USA, Inc., although it is possible that certain companies may also act as an importer of record from time to time. The contact information for the two known U.S. importers of subject merchandise is provided below:

1. Gregory Lee  
President and CEO  
**Samsung Electronics America, Inc.**  
105 Challenger Road  
Ridgefield Park, NJ 07060-0511  
Phone: (201) 229-4000  
Fax: (201) 229-4029  
g.lee@sea.samsung.com  
www.samsung.com
2. John Taylor  
Vice President of Public Affairs and Communications  
**LG Electronics USA, Inc.**  
1000 Sylvan Avenue  
Englewood Cliffs, NJ 07632  
Phone: (201) 816-2000  
Fax: (201) 816-2188  
john.taylor@lge.com  
www.lge.com