



SOURCING INTERNATIONAL, LLC

September 9, 2009

Secretary of Commerce
Attention: Import Administration
APO/Dockets Unit
Room 1870
U.S. Department of Commerce
14th Street & Constitution Avenue, NW
Washington, DC 20230

To the International Trade Administration:

Sourcing International has been in business since December of 2003 and resides at 1860 Obispo Ave Unit I, Signal Hill, CA 90755. We created Lady Bug Candles to offer candle lovers, something other than votive, jar, or cylinder shaped candles. Our Novelty candles are unique, in that each design is hand sculpted, hand painted and every candle is embellished with our signature Lady bug.

We have invested a great deal of resources developing the Lady Bug candle line. We have created much needed jobs employing artists, graphic designers and packaging consultants to bring this line of unique novelty/home décor candles to the U.S. market.

We have taken great care to research and implement all aspects of the import regulations specifically in regard to the anti-dumping duties to insure we are in compliance with US trade law.

We are now confronted with the possibility of the rules being changed while our company's dream of bringing this line to the U.S. market is still in its infancy.

To increase the scope of the anti-dumping ruling to include ALL candles from the PRC with no distinction whatsoever for candles whose primary function is décor will drive us out of this new niche market just as it was beginning to show a very promising future.

Sourcing International has researched and abided by all formal procedures in submitting our scope inquires and also used our time, energy, and financial resources to educate ourselves on prior determinations from the Department as guidance. We understand that the Department feels "buried" in scope inquires at the moment and it is our understanding that the large number of scope ruling requests being submitted is one justification for broadening the scope of the current ruling. We want to help find a solution to make this process more efficient and definitive for all parties involved. While researching the true number of scope requests over the past 23 years we have found the department has been asked to rule on what averages out to be two scope requests per month.

We would like to make a couple of recommendations to streamline the evaluation process. The current process requires that we request separate rulings for what are basically the same product. For example if we submit a 10 gram red rose candle for consideration, we must also submit a complete separate request for a 20 gram red rose



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or a pink rose, or a rose bouquet. If the process were streamlined to include what amounts to “a rose, is a rose, is a rose”, those 3-4 requests would then become one.

For the novelty candle industry this would remove the requirement of submitting every color and every weight of what basically is the same product for review.

The rulings we have received to date tell us that if you can recognize the candle from 3 different angles or sides as a flower then it's safe to say it's outside the scope and no ruling is needed. The potential changes to the current scope ruling by adding ALL candles to the scope will effectively remove our ability to import this product.

Sourcing International respectfully requests The Department go with the option A which states:

The Department would consider all candle shapes identified in the scope of the Order, (i.e., tapers, spirals, and straight-sided dinner candles; rounds, columns, pillars, votives; and various wax filled containers) to be **within** the scope of the Order, regardless of etchings, prints, moldings or other artistic or decorative enhancements including any holiday related art. All other candle shapes would be considered outside the scope of the ruling.

If The Department were to choose option B, which will place ALL candles within the scope regardless of their shape or use would certainly stifle this new emerging market.

In closing, it is Sourcing International's position that increasing the scope of the Anti-Dumping Duty to include all novelty candles in addition to those already ruled inside the scope would be detrimental to our business and ultimately the U.S. marketplace.

If I can be of any assistance or should you have any questions please contact me at address below.

Respectfully submitted,

Barry Carpenter
President

\$1.00

LADY BUG CANDLES™

JUNE 2009



Sourcing International, LLC 1860 Obispo Ave. Unit I, Signal Hill, CA 90755
Phone 562 498-6140 Fax 562 498-6150 www.LadyBugCandles.com



Capture the floral beauty and exotic aroma of our unique Lady Bug Candles.™
Each candle is brilliantly made and guaranteed to burn clean, bright and vibrant.
Take your garden indoors where flourishing fragrances and natural
beauty will overwhelm you and your home.



All candles come hand packaged in clear acetate boxes tied with our signature green lady bug ribbon, hang tag and small lady bug emblem hidden somewhere on every candle...



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1860 Obispo Ave. Unit I, Signal Hill, CA 90755 Phone 562 498-6140 Fax 562 498-6150 www.LadybugCandles.com



Hyacinth Bulb, #1029 (lavender), #1030 (white), #1031 (red)
 \$6.00 each / 3 pc min.
 size 2.5" (W) x 7.75" (H)
 Scent "Starlight"



Petite Orange Tulip Bunch #1036
 \$6.00 each / 3 pc min.
 size 4" (W) x 3.5" (H)
 Scent "Flower Spirit"



Hyacinth Bulb #1032
 \$4.00 each / 3 pc min.
 size 2.25" (W) x 4.5" (H)
 Scent "Starlight"



Red Rose Ball #1013
 \$8.75 each / 3 pc min.
 size 4.25" (DIA.)
 Scent "Moroccan Rose"



Fushia Rose Ball #1014
 \$8.75 each / 3 pc min.
 size 4.25" (DIA.)
 Scent "Moroccan Rose"



Pink Rose Ball #1015
 \$4.75 each / 3 pc min.
 size 3" (DIA.)
 Scent "Moroccan Rose"



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3



Gerber Daisy Bunch #1019
\$9.00 each / 3 pc min.
size 4.5" (W) x 5.5" (H)
Scent "Flower Delight"



Peony Bunch #1016
\$9.00 each / 3 pc min.
size 4.5" (W) x 5.5" (H)
Scent "Flower Spirit"



Anemone Bunch #1018
\$9.00 each / 3 pc min.
size 4.5" (W) x 5.5" (H)
Scent "Ocean Mist"



Rose Bunch #1017
\$9.00 each / 3 pc min.
size 4.5" (W) x 5.5" (H)
Scent "Moroccan Rose"





Yellow Tulip Bunch #1020
 \$9.00 each / 3 pc min.
 size 4.5" (W) x 5.5" (H)
 Scent "1000 Fields"



Red Rose Pave #1024
 \$7.50 each / 3 pc min.
 size 5" (W) x 6" (H)
 Scent "Moroccan Rose"



White Lily Pave #1022
 \$6.50 each / 3 pc min.
 size 4.25" (W) x 5.5" (H)
 Scent "1000 Fields"



Daffodil Pave #1023
 \$6.50 each / 3 pc min.
 size 4.25" (W) x 6" (H)
 Scent "1000 Fields"



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Stargazer Pave #1025
\$7.50 each / 3 pc min.
size 5" (W) x 6" (H)
Scent "Starlight"



Sunflower Bunch #1021
\$9.00 each / 3 pc min.
size 4.5" (W) x 5.5" (H)
Scent "Sunny Days"



Sunflower Pave #1027
\$7.50 each / 3 pc min.
size 5" (W) x 6" (H)
Scent "Sunny Days"



Tulip Pave #1026
\$7.50 each / 3 pc min.
size 5" (W) x 6" (H)
Scent "1000 Fields"



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Petite Anemone Bunch #1033
\$6.00 each / 3 pc min.
size 3.5" (W) x 4" (H)
Scent "Ocean Mist"



Petite Sunflower Bunch #1034
\$6.00 each / 3 pc min.
size 3.5" (W) x 4" (H)
Scent "Sunny Days"



Petite Zinnia Bunch #1035
\$6.00 each / 3 pc min.
size 3.5" (W) x 4" (H)
Scent "Flower Delight"



Petite Tulip Bunch #1044
\$4.75 each / 3 pc min.
size 3.25" (W) x 4.25" (H)
Scent "1000 Fields"



Yellow Sun Cameo #1045
\$5.75 each / 3 pc min.
size 4.25" (W) x 4" (H)
Scent "Sunny Days"



3 Pc Pink Daisy #1011
\$4.00 set / 3 set min.
size 3" (W) x 1" (H)
Scent "Flower Delight"



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Pink/Yellow Dalia #1007
\$3.25 each / 3 pc min.
size 4" (W) x 2" (H)
Scent "Flower Delight"



Sunflower #1008
\$3.25 each / 3 pc min.
size 3.75" (W) x 2" (H)
Scent "Sunny Days"



Red Rose #1012
\$6.00 each / 2 pc min.
size 5.25" (W) x 2.5" (H)
Scent "Moroccan Rose"



Lady Bug Gnome #1028
\$6.75 each / 2 pc min.
size 3" (W) x 5.25" (H)
Scent "Flower Spirit"



3 Pc Sunflower #1010
\$4.00 set / 3 set min.
size 3" (W) x 1" (H)
Scent "Sunny Days"



Pink Rose #1009
\$3.25 each / 3 pc min.
size 3.75" (W) x 1.5" (H)
Scent "Moroccan Rose"



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6 Mini Flower Pots Asst. B #1001
 \$7.00 set / 3 set min.
 size 1.5" (W) x 1.5" (H)
 Scent "Flower Spirit"



6 Mini Flower Pots Asst. A #1002
 \$7.00 set / 3 set min.
 size 1.5" (W) x 1.5" (H)
 Scent "Flower Spirit"



6 Mini Cactus Asst. #1003
 \$7.00 set / 3 set min.
 size 1.5" (W) x 1.5" (H)
 Scent "Sunny Days"



3 Pc Pink Rose Buds #1004
 \$4.75 set / 3 set min.
 size 1.5" (W) x 1.75" (H)
 Scent "Moroccan Rose"



3 Pc Red Rose Buds #1005
 \$4.75 set / 3 set min.
 size 1.5" (W) x 1.75" (H)
 Scent "Moroccan Rose"



3 Pc Yellow Rose Buds #1006
 \$4.75 set / 3 set min.
 size 1.5" (W) x 1.75" (H)
 Scent "Moroccan Rose"



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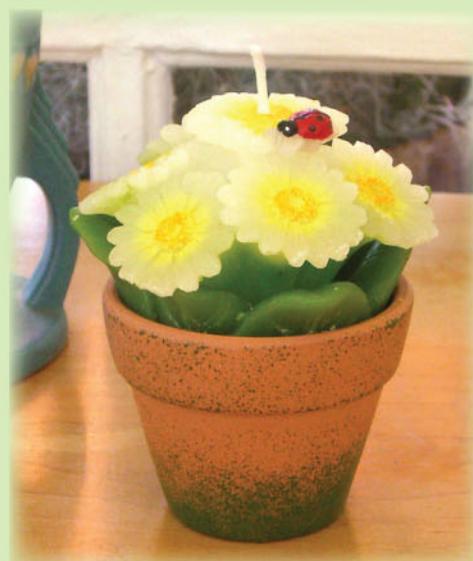
POTTED FLOWER ASSORTMENTS



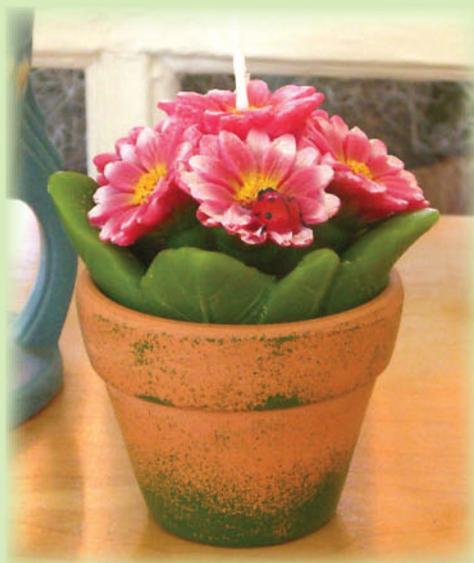
Potted Daffodil bunch
Scent "1000 Fields"



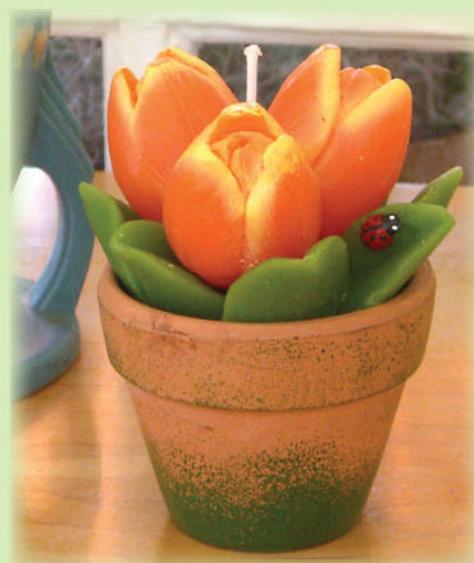
Potted Sunflower trio
Scent "Sunny Days"



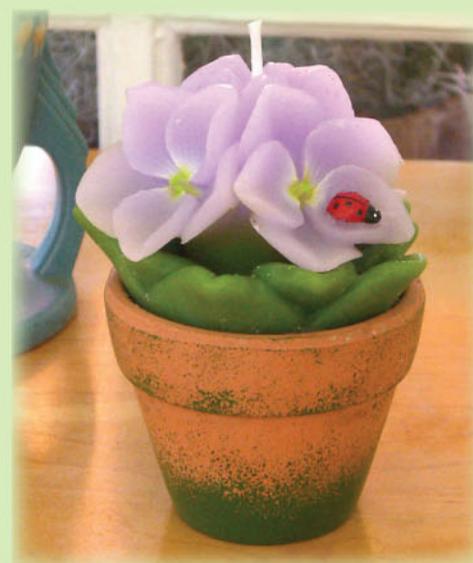
Potted daisy bunch
Scent "Flower Delight"



Potted Pink Daisy bunch
Scent "Flower Spirit"



Potted Tulip bunch
Scent "Flower Spirit"



Potted Violet bunch
Scent "Flower Spirit"



6 Potted Flowers Assorted #1037
\$4.75 each / \$28.50 set / 1 set min.
size 2.75" (W) x 3.5" (H)
Scent Assorted



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OUTDOOR CITRONELLA CANDLES (Shipping Feb, 2010)



6 Assorted Citronella Tin Pots #1047
\$4.00 each / \$24.00 per set / 1 set min.
size 3" (W) x 2.75" (H)
Scent "Citronella"

Terms & Conditions

ORDER MINIMUMS

Opening Order / new account: \$150.00, Reorder / established account: \$100.00
Products must be ordered in minimum quantities as stated in catalog.

NEW ACCOUNTS

We request credit cards for first time orders on new accounts. We gladly accept Visa, MasterCard and American Express and Net 30 terms with approved credit on reorders. We do not ship COD.

FREIGHT

All merchandise is shipped F.O.B Signal Hill, CA. Our primary shipping method is Fedex Ground. Upon request we will ship using customers shipping number. Expedited shipping is available upon request for an additional fee.

BACKORDERS

Items not in stock will be backordered. Please indicate on order if backorders are not accepted.
All backordered product will be shipped when available unless cancelled by customer

UPC

All our products have UPC barcodes. A listing of our item UPC codes is available upon request.

RETURNS AND CLAIMS

All claims for damages or shortages must be reported within seven days of receipt of shipment. Call customer service at 562 498-6140 for Return Authorization Number. Our shipping department will not accept returned merchandise without an RA#.

In case of carrier-induced damages, file a damage claim with the carrier immediately and retain all original packaging for 21 days. Refused shipments are subject to a restocking charge of 15% of the cost of the order, plus freight.



TO PLACE ORDERS

Call: (562) 498-6140 - CA Corporate Office, Fax orders to: (562) 498-6150
Question? Call Lori Wrubel (860) 675-1616 National Sales Manager
or email Lori@sourcinginternational.com

For additional information, new styles and specials visit our web site: www.LadyBugCandles.com

FLOOR DISPLAY

White - washed wood/shipped flat for easy assembly

CANDLE PREPACK ASSORTMENTS:

ASSORTMENT A:



44 candles
1 of each design = \$270
Item #LB44



Small Display
\$45 offset with free candles at retail
Item #2102

Total Assortment: \$315



Small floor Display #2102
size 19.75" (W) x 23" (D) x 58" (H)
weight 20 lbs

Displays are only available with a pre-pack assortment or a minimum order
Small display/min. order of \$270
Large display/ min. order of \$540

ASSORTMENT B:



88 candles
2x of each design = \$540
Item #LB88



Large Display
\$100 offset with free candles at retail
Item #2101

Total Assortment: \$640



4 sided view Display #2101
size 30" (DIA.) x 72.5" (H)
weight 55 lbs

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Phone 562 498-6140 Fax 562 498-6150 Lori Wrubel Nat. Sales Mngr 860 675-1616

