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Scope Inquiry
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MEMORANDUM FOR: Barbara E. Tillman
Acting Deputy Assistant Secretary
for Import Administration

FROM: Wendy J. Frankel *wjf*
Director
AD/CVD Operations, Office 8

SUBJECT: Final Scope Ruling – Antidumping Duty Order on Certain Cased
Pencils from the People's Republic of China (PRC) – Request by
Fiskars Brands, Inc.

SUMMARY

On September 10, 2004, Fiskars Brands, Inc. (Fiskars), an importer, requested that the U.S. Department of Commerce (the Department) issue a ruling as to whether five individual compasses imported by Fiskars are within the scope of the antidumping duty order on certain cased pencils from the People's Republic of China (PRC), 59 FR 66909 (December 28, 1994) (the Order). The compasses in question are the "Classroom Compass," the "Bow Compass," the "Lock-it Compass," the "Schoolworks Abc 123 Compass," and the "Soft-Grip Compass" (collectively the compasses). Fiskars states that the subject compasses are the type used by children to learn basic geometry in school. Fiskars describes a compass as "... a plastic device with two legs, one with a sharp metal point or a rubber tip and the other with a holder for a pencil or any other marking device. The metal and/or rubber tipped leg are set on a spot and the leg with the pencil or other marking device is rotated around the axis of the point, thereby creating a circle or arc on paper." Furthermore, Fiskars states that "... a pencil is packaged with the compass, already set into the drawing leg, although several models may adjust to also fit pens, markers or other drawing implements (e.g., Bow Compass, Classroom Compass)." In accordance with 19 CFR 351.225(k)(2), we recommend that the Department determine that the merchandise in question is not within the scope of the Order.



BACKGROUND

In its September 10, 2004, submission (dated September 9, 2004), Fiskars argues that the compasses with a pencil "attached or included" are not within the scope of the Order because the compasses are physically different from the products that are within the scope of the Order, *i.e.*, pencils. In addition, Fiskars argues that the pencil is not an integral component of the compasses because other "marking" devices such as a pen or marker may be used with the compasses. Furthermore, Fiskars claims that the compasses themselves are not writing instruments. In addition, Fiskars claims that the relative cost of the pencil (when compared to an individual complete compass) is less than 10 percent. Fiskars also claims that the scope of the Order is not dispositive with respect to compasses and, therefore, that the Department may consider the *Diversified Products* criteria. In addition, Fiskars states that it reviewed U.S. Customs (Customs) rulings of compasses with pencils attached that were classified by Customs as items other than pencils.

On October 25, 2004, the Department initiated a formal scope inquiry and invited all interested parties to submit comments or factual information regarding this matter.

On November 15, 2004, Target Corporation, an interested party, submitted comments. In its comments, Target argues that the subject compasses are outside the scope of the Order "... because they are not described by the scope of the Order language as specified in the petition, the initial investigation, and the determinations of the Secretary and the Commission." In addition, Target contends that a review of the *Diversified Products* criteria supports its position that compasses are outside the scope of the Order.

On November 24, 2004, Fiskars submitted rebuttal comments claiming that Target's comments support its position that compasses are not covered by the scope of the Order. In addition, Fiskars reiterates some of its arguments made in its September 10, 2004, submission and states that its September 10, 2004, comments are "... determinative as to the conclusion that the subject compasses are outside the scope ..." of the Order.

On November 24, 2004, Sanford Corporation, Musgrave Pencil Company, and General Pencil Co., Inc. (Sanford, Musgrave and General), interested parties, submitted rebuttal comments to Target's November 15, 2004, comments. Sanford, Musgrave and General argue that the compasses imported by Fiskars are within the scope of the Order because they are designed solely for drawing use. Sanford, Musgrave and General argue that the Department has previously concluded that pencils imported in sets can be outside the scope of the Order when "pencils are a minor component of the set or when the set is neither intended to be nor is comprised of writing instruments alone or with other components closely associated with writing instruments only ...," citing the memorandum from Laurie Parkhill to Jeffrey May dated September 29, 2004: "Final Scope Ruling – Antidumping Duty Order on Certain Cased Pencils from the People's Republic of China – Request by Target Corporation Regarding Hello Kitty Fashion

Totes" (Kitty). Sanford, Musgrave and General argue that the compasses imported by Fiskars meet neither of these criteria. Sanford, Musgrave and General claim that one of the two items comprising the compass/pencil product is a pencil and therefore is not a minor component, and that the compasses are useful only for drawing purposes. Moreover, Sanford, Musgrave and General contend that Target's claim that the compasses are outside the scope of the Order because they are mixed-media sets mis-states the Department's position in previous scope determinations in which the Department found mixed-media sets outside the scope of the Order when the sets included pencils and other items with no applicability for drawing or writing, citing Kitty and the memorandum from Holly A. Kuga to Richard W. Moreland dated February 9, 1998: "Final Scope Ruling – Antidumping Duty Order on Certain Cased Pencils from the People's Republic of China – Request by Creative Designs International, Ltd." (Designs).

ANALYSIS

A. Regulatory Framework

The regulations governing the Department's antidumping scope rulings can be found at 19 CFR 351.225. On matters concerning the scope of an Order, the Department first examines the descriptions of the merchandise contained in the petition, the determinations of the Secretary and the International Trade Commission (ITC), and the initial investigation. See 19 CFR 351.225 (k)(1). This ruling may take place with or without a formal inquiry. If the Department determines that these descriptions are dispositive of the matter, the Department will issue a final scope ruling as to whether or not the subject merchandise is covered by the Order (see 19 CFR 351.225(d)).

Conversely, where the descriptions of the merchandise are not dispositive, the Department will consider the following additional factors set forth at 19 CFR 351.225(k)(2): i) the physical characteristics of the merchandise; ii) the expectations of the ultimate purchasers; iii) the ultimate use of the product; iv) the channels of trade in which the product is sold; and v) the manner in which the product is advertised and displayed. The Department applies these factors when the product descriptions contained in the petition, the determinations of the Secretary (including prior scope rulings) and the ITC, and the initial investigation are not dispositive. The determination as to which analytical framework is most appropriate in any given scope inquiry is made on a case-by-case basis after consideration of all record evidence before the Department.

In its petition, filed on November 9, 1993 (the petition), the petitioners described certain cased pencils as follows:

Cased pencils are writing and drawing instruments . . . Cased pencils are manufactured in varying dimensions . . . The sheath may be round or may be milled to create multiple-sided surfaces . . . The term "cased pencils" should be understood to describe pencils cased in wood and/or man-made materials, with cores of graphite or other materials, whether or not decorated and whether or not

tipped (e.g., with erasers, etc.) in any fashion, and either sharpened or unsharpened . . . The class or kind of merchandise that is the subject of this petition does not include mechanical pencils, pens, or any other such writing instruments. All pencils share the characteristic of having their length reduced, through sharpening, as a result of use. The reduction in size attributable to sharpening, and relatively inexpensive cost, means that they readily are disposable.

With respect to the domestic like product, the petitioners state:

Regardless of the materials used . . . cased pencils retain in common the physical characteristics of having a rigid sheath bonded to a writing core. Cased pencils are rendered usable by means of paring away the rigid bonded sheath to expose the writing core . . .

See the petition at 8 - 15.

The scope of the Order adopted the language of the petition:

{t}he products covered by this investigation are certain cased pencils of any shape or dimension which are writing instruments and/or drawing instruments that feature cores of graphite or other materials encased in wood and/or man-made materials, whether or not decorated and whether or not tipped (e.g., with erasers, etc.) in any fashion, and either sharpened or unsharpened. The pencils subject to this investigation are classified under subheading 9609.10.00 of the Harmonized Tariff Schedule of the United States ("HTSUS").

Specifically excluded from the scope of this investigation are mechanical pencils, cosmetic pencils, pens, non-cased crayons (wax), pastels, charcoals, and chalks.

See Antidumping Duty Order: Certain Cased Pencils from the People's Republic of China, 59 FR 66909 (December 28, 1994) (the Order).

After citing the above scope language, the ITC made the following comment:

{t}he scope of imported articles includes a variety of cased pencils including commodity or standard yellow pencils, colored pencils ("cased crayons"), decorated, imprinted or specialty pencils, drafting pencils, pencil blanks, and raw pencils. Commerce determined that these imported items constitute a single class or kind of merchandise.

See Certain Cased Pencils from the People's Republic of China, Investigation No. 731-TA-669 (Final), USITC Publication 2837, December 1994 (ITC Final) at page I-6.

Documents and parts thereof from the underlying investigation deemed relevant by the Department to the scope of the Order were made part of the record of this ruling and are referenced herein. Documents that were not presented to the Department or placed by it on the record do not constitute part of the administrative record for this scope ruling.

B. Department's Analysis

The issue presented by this scope inquiry is whether five compasses imported by Fiskars, each of a unique design, are within the scope of the Order on certain cased pencils from the PRC. The underlying record established in this scope inquiry – the petition, the Department and ITC determinations (including prior Department scope determinations) and the relevant Order – is not dispositive of this precise issue because it does not address whether “mixed media” sets, such as the compasses (with pencil included), are the same class or kind of merchandise as that covered by the Order. The Department has previously addressed scope inquiries covering mixed media sets using the factors listed in 19 CFR 351.225(k)(2). See Designs, and the memorandum from Tom Futtner to Holly A. Kuga dated April 5, 2001: “Final Scope Ruling – Antidumping Duty Order on Certain Cased Pencils from the People's Republic of China – Request by Dollar General Corporation” (Dollar). As a result, the Department has analyzed the current scope inquiry applying the factors set forth in 19 CFR 351.225(k)(2).

1. Physical Characteristics

Fiskars argues that the pencil is only a minor component of the compasses and that the compasses, considered without the included pencil, would not be covered by the scope of the Order. Fiskars cites *Webster's Third International Dictionary* (1986) which defines a compass as “. . . an instrument for describing circles, transferring measurements, and similar operations consisting in its simple form of two pointed branches joined at the top by a pivot, one of the branches generally having a *pen or pencil* point (emphasis added) – called also *pair of compasses* (emphasis in the original).”

Target states that the individual compass comprises the bulk and value of the product and that the short pencil included with the compasses is only a minor component and should not control the scope determination as the pencil is ancillary to the compasses and is consumable. Target argues that the compasses are durable and perform a specialized function, i.e., they are designed to be used in a variety of applications which include drawing circles or arcs on paper, overhead projectors, blackboards, and whiteboards using a variety of writing utensils including items not covered by the scope of the Order such as pens and chalk.

Sanford, Musgrave and General argue that the pencil is one-half of the components comprising the compasses and, therefore, is a significant and not a minor component. Sanford, Musgrave and

General argue that the fact that the pencil is consumable has no bearing on the scope ruling since all pencils are consumable and the pencils Fiskars imports are designed to be consumed by drawing with the compasses. Sanford, Musgrave and General state that it may be true that other writing instruments could be used with the compasses, but that the products under consideration include pencils and there is no record evidence demonstrating that a purchaser of the compasses would immediately discard the pencil and replace it with a different marking medium. In addition, Sanford, Musgrave and General argue that the pencil is not ancillary to the compasses' function because without the pencil (or other marking medium) the compasses cannot be used to draw circles or arcs. Sanford, Musgrave and General argue that other mixed media sets considered in Kitty and Designs, which were previously found outside the scope of the Order, included items that have no physical capability in drawing or writing whereas both components of the compass/pencil set are intended to be used exclusively for drawing.

We have reviewed the language in the Order. In the Order, the Department adopted the language of the petition in providing a description of the physical characteristics of covered merchandise:

{t}he products covered by this investigation are certain cased pencils of any shape or dimension which are writing instruments and/or drawing instruments that feature cores of graphite or other materials encased in wood and/or man made materials, whether or not decorated and whether or not tipped (e.g., with erasers, etc.) in any fashion, and either sharpened or unsharpened.

See the Order, 59 FR at 66909

Based on an examination of the physical characteristics of the compasses imported by Fiskars, the Department determines that the pencils are a minor component of the compasses. Each compass, considered individually, is the significant item and is not subject merchandise. The compasses are not consumed as they are used to draw. The pencils included with the compasses are approximately 3 ½ inches long (sharpened) and 1/4 inch in diameter. The pencils do not have erasers attached and do not bear any marks such as brand names, logos, motifs, ornamentation or hardness designations. Three of the five compasses are marked with the Fiskars brand name, one is marked patent pending and another is marked with a U.S. patent number. The pencils are consumed as they are used to draw/write. Although the compasses are sold with the pencil included, the pencil can be removed from the compass and replaced with other writing media (e.g. pens and chalk). Thus, the overwhelming component of the product in question - the compass - is not akin to the subject merchandise.

2. Expectations of the Ultimate Purchasers

According to Fiskars, the consumer who purchases the subject compasses "... expects to obtain the compasses for the purpose of either teaching or learning geometry, not merely for writing or drawing." Furthermore, Fiskars claims that the purchaser of the compasses would not purchase the compasses to solely or principally acquire the pencil. Furthermore, Fiskars argues that

"certain compasses" can accommodate "pencils, pens, markers and more." Moreover, Fiskars argues that "several of the compasses" have measuring scales, features not associated with pencils.

Target argues that the purchasers of the products subject to this scope ruling use the compasses for schoolwork such as geometry and consider factors such as the following in their selection of compasses: suitability for work-surface, comfort, ease of use, accuracy, and safety. Target states that manufacturers address these factors with notations on the packaging, e.g., "Unique Rubber tip holds compass in place on paper, overhead projectors, blackboards and whiteboards (Classroom Compass)." Target contends that purchasers of pencils covered by the scope of the Order use pencils for writing and/or drawing and consider different qualities such as hardness and blackness of lead, outer casing material (type of wood, plastic or metal), shape and length. In addition, Target contends that the purchaser of the compasses would not purchase them only to obtain a "single, inexpensive short pencil."

Sanford, Musgrave and General state that when Target claims that purchasers "intend to use the compasses for schoolwork such as geometry," it concedes that the compasses will be used as drawing instruments, i.e., the schoolwork application is drawing circles. In addition, Sanford, Musgrave and General state that the purchaser of the compasses would expect to use the products to draw because they have no other use. Sanford, Musgrave and General argue that this is unlike the vanity set considered in Designs which was found outside the scope of the Order because the vanity set included several items that were not used for writing/drawing or were not items associated with writing/drawing.

The petition states that "{t}he ultimate purchaser necessarily must expect to use a pencil as a writing instrument; indeed, there is no other use. A purchaser may also seek an inexpensive, disposable, erasable writing product, and would expect to find these qualities in a cased pencil, but not in other writing instruments." See the public version of the petition at 12.

Although we agree with Sanford, Musgrave and General that a purchaser acquiring compass/pencil products would reasonably be expected to use them for drawing, Sanford, Musgrave and General have not provided evidence that a purchaser would obtain the compasses with the expectation of solely or principally acquiring pencils. Furthermore, based on a review of the packaging and contents of the compasses, it appears that the purchaser of the compasses expects to obtain a compass. While notations on the front of the packaging highlight features of the compass, the fact that a pencil is included is not mentioned at all on the front of the five packages and is mentioned on the back of the packaging for only two of the compasses. Thus, we conclude that the expectations of the ultimate purchasers of cased pencils and those of the ultimate purchasers of Fiskar's products at issue are dissimilar.

3. Ultimate Use

Fiskars argues that the ultimate use of the compasses is to measure and perform mathematical equations and is not merely drawing/writing.

Target argues that the ultimate use of pencils subject to the scope of the Order is writing or drawing by hand. Target claims that compasses are used to "measure and describe circles and arcs" in geometry exercises, which requires mechanical precision. Target claims that to measure and describe circles and arcs, one of various types of marking media are attached to the compass, the compass is pivoted and turned to produce the circle or arc as the "writing utensil trails across a writing surface." Target contends that it would be very inconvenient, "if not impossible," to use the compasses with the attached writing instrument to write or draw due to the knob which holds the writing instrument in place and due to the angles of the legs and the tapered designs. In addition, Target argues that in previous scope rulings the Department considered the collective purpose of the merchandise under consideration. For example, Target claims that in Dollar the Department stated that the "... ultimate use of the merchandise is as a desk organization system and not a writing instrument. Although the various components may have individual uses, we conclude that the ultimate use of the stationery set is as a desk set." Target claims that the collective purpose of the compasses is to "describe circles and arcs for learning activities, not simply writing or drawing." In addition, Target claims that, as in Dollar, the compasses can be used for their intended activity without the use of pencils.

Sanford, Musgrave and General argue that Target correctly notes that "the ultimate use of cased pencils subject to the scope of the Order is to be used for writing or drawing." Sanford, Musgrave and General argue that when Target states that compasses are used to "describe" circles/arcs and that "the circle or arc is produced when the writing utensil trails along a writing surface," it is saying "drawing" circles/arcs in a different way. Sanford, Musgrave and General argue that circles/arcs are drawn with drawing instruments and that, as Target has noted, the scope of the Order covers cased pencils used for drawing. The petitioner states that, therefore, the ultimate use of the compasses is completely different from that of the desk set considered in Dollar, *i.e.*, the collective purpose of the Fiskars compasses is to draw or "describe" circles/arcs.

The petition states that all pencils have the ultimate use as writing (including drawing) instruments. "Although different pencils may serve particular writing needs (*e.g.*, drafting pencils), ultimately all pencils are used to form a written image on a surface medium, such as paper." See the public version of the petition at 12.

Based on a review of the components of the compasses, we find that the ultimate use of the merchandise is as an instrument to measure and draw precise circles/arcs. While the compasses are intended to be used for drawing circles/arcs, a significant component of the compass/pencil combination under consideration in this scope inquiry, the compass, is not subject merchandise. In addition, two of the five compasses are specifically designed to accommodate writing/drawing

instruments other than pencils¹ and there is no evidence on the record indicating that the other compasses cannot accommodate writing/drawing instruments other than pencils. The compasses can be used as drawing instruments using various writing utensils such as crayons, chalk and markers. Moreover, there are no notations on the packaging for some of the compasses indicating that pencils are included. Therefore, we conclude that the ultimate use of the merchandise covered by the Order and that of Target's products is dissimilar.

4. Channels of Trade

Citing Dollar, Fiskars argues that the fact that the merchandise subject to the scope of the Order may be sold in the same channels of trade as the compasses does not preclude the Department from finding them outside the scope of the Order.

Target contends that although the channels of trade may be similar for pencils and the compasses, pencils and compasses have distinct and mutually exclusive uses and, therefore, the similarity in channels of trade should not control the ruling as to whether compasses are subject to the scope of the Order or not.

Sanford, Musgrave and General argue that Target's assertion that compasses and pencils "have distinct and mutually exclusive purposes" is beside the point and is untrue because both the pencil and compasses are used to draw circles/arcs.

In discussing channels of trade, the petition states that all pencils are distributed through similar channels of trade, *i.e.*, the producer or importer sells directly to retail customers or to distributors. According to the petition, distributors, in turn, sell to end-users, including individual consumers, businesses, and schools. See the public version of the petition at 12.

According to the ITC, pencils are sold through virtually all channels of distribution within the mass merchants and office-products markets, including wholesalers, office-supply superstores, mail-order catalogs, retail mass marketers, advertisement specialty dealers, and major discount stores. See *Certain Cased Pencils from Thailand*, USITC Pub. 2816 (October 1994), at II-47.² We used the Store Locator tool at Fiskars' website (www.fiskars.com) to determine through what outlets Fiskars sold its compasses. We observed that Fiskars' "online vendors" for compasses were Office Depot (www.officedepot.com) and Ace Hardware (www.acehardware.com). Retail outlets located throughout the United States include bookstores, electronics stores, hardware stores, stationery stores, educational supply stores, office supply stores, art stores, grocery stores, drug stores, and mass retailers including Target. All of these types of outlets sell, or are likely to

¹Instructions for use of these two compasses included on the packaging state "Place writing utensil in holder and tighten." A notation on the Classroom Compass states "Adjustable nut securely holds pens, pencils and thin markers." A notation on the Bow Compass states "Adjusts to fit pencils, pens, markers and more."

²The information contained in the final report on Thailand was part of the ITC's record in *Certain Cased Pencils from the People's Republic of China*, USITC Pub. 2837, at II-3 (December 1994).

sell, both subject merchandise and compasses. Since both subject merchandise and the compasses are sold, or are likely to be sold, through these outlets, we conclude that there is evidence of some overlap in the channels of distribution between merchandise covered by the Order and Fiskar's imported products. See the memorandum to the file from Paul Stolz dated February 10, 2005 (2/10 memo), for details of the search results.

5. Advertising and Display

Fiskars claims that the compasses are advertised, sold and bought as classroom products, with the intent that the end-user will use them in geometry instruction.

Target argues that the notations on the packaging of the compasses focus on the features of the compasses and not on the pencils. In addition, Target notes that some of the compasses are promoted on their ability to accommodate various writing utensils other than pencils to be used to draw on various surfaces. Furthermore, Target claims that the fact that no mention of the properties of the included pencil are noted on the packaging of any of the five compasses supports its argument that the pencil is a minor component of the compass/pencil products under consideration in this scope ruling.

Sanford, Musgrave and General argue that the pencil and compass are displayed together in the retail package and that the advertising materials submitted by Fiskars in its request for a scope ruling specifically note that the product "includes pencil." Therefore, Sanford, Musgrave and General argue, both of the compass/pencil components are highlighted in the written notations on the packing materials and are readily apparent to the prospective purchaser. In addition, Sanford, Musgrave and General claim that the properties of a pencil are well-known to the buying public, thus it is unnecessary to describe the pencil's properties on the packaging.

According to the petition, "{t}o the extent that pencils are advertised, different varieties typically will be presented in the same catalog. Pencil displays in office supply stores, stationery stores, etc., typically will also present different varieties of pencils in the same area." See the public version of the petition at 13.

A Department official, Paul Stolz, observed on-site at the Germantown, Maryland Target retail outlet on February 5, 2005, that compasses are displayed in the store's home/office section, separate from the area in which pencils are displayed. In addition, the Department official observed at a building supply company in Damascus, Maryland that compasses are displayed with protractors, rulers, and other measuring instruments. A small selection of pencils, crayons, chalks, and markers is located in close proximity to the compasses, but these items appear to be displayed as ancillaries to the compasses and other measuring instruments. See the 2/10 memo. Moreover, when we searched Fiskars' website using the keyword "compass," the results returned a category titled "Fiskars for the Classroom - Products." This category includes "Tools," specifically, compasses, protractors, rulers, and pencil sharpeners. Pictures are shown for all items included in "Tools." Pencils are not shown in the pictures depicted in this category except

for the pencils attached to compasses. In addition, we searched Fiskars' website using the keyword "pencil." This search returned the same results as our search using the keyword "compass," as described above, because the descriptions of some of the Compasses³ include a notation that the compasses include a pencil. (The notation appears to address the pencil as a feature of the compass rather than as an individual pencil in that no description of the features of the pencil itself is offered.) Neither search returned any results indicating that Fiskars sells pencils as individual, stand-alone products. See the 2/10 memo. Furthermore, the packaging for two of the compasses includes the notation "Look for other Fiskars products" which is followed by depictions of scissors, a protractor, and a pencil sharpener.

In addition, based on a physical inspection of samples of the compass and packaging submitted to the Department, we observed that the notations on the packaging of the compasses overwhelmingly address the characteristics of the compass rather than the pencil.

Because the compasses are displayed separately from subject merchandise at certain retailers, because Fiskars' website does not include pencils individually in its "Tools" category in which compasses are included, and because advertising and packaging materials overwhelmingly or exclusively address the features of the compass and not the pencil, we conclude that the compasses and the merchandise subject to the Order are not advertised or displayed in the same manner.

C. Additional Arguments Submitted by the Parties

Fiskars claims that cost of the pencil relative to the compass component supports its contention that the compasses are outside the scope of the Order. Fiskars claims that the cost of the pencil relative to the individual compass is less than 10 percent. Fiskars contends that the fact that the cost of the complete compass is "considerably greater than the cost of the pencil would deter any attempts to circumvent the Order by importing a pencil attached to or included with a compass." Fiskars claims that cost was a factor considered by the Department in its scope rulings with respect to Designs and Dollar.

Cost is not one of the factors we consider when making scope rulings pursuant to 19 CFR 351.225(k)(2). The merchandise subject to this scope request is the multi-piece compass/pencil product and not the pencils individually, which are only minor components of the compass/pencil products. Thus, were cost a factor, the relevant cost would be the cost of the entire compass/pencil products and not just the cost of the pencil. See Designs.

CONCLUSION

In summary, in accordance with 19 CFR 351.225(k)(2), based on our review of the record of this scope inquiry, we find that the physical characteristics of the merchandise at issue, the

³The Fiskars website did not include a description of the Schoolworks Abc 123 Compass.

RECOMMENDATION

 Agree

Disagree

Barbara E. Illman

June 3, 2005
(Date)