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December 18, 2017

Ms. Terry LaBat
Acting Chair
Committee for the Implementation of Textile Agreements
Room 30003
United States Department of Commerce
Washington, DC 20230

Submitted via email to
OTEXA_MoroccoFTA@trade.gov

Dear Ms. Labat:

Subject: Request for Public Comments on a Commercial Availability Request Under the US-Morocco Free Trade Agreement; whether certain knit fabrics can be supplied by the U.S. domestic industry in commercial quantities in a timely manner.

Thank you for the opportunity to comment on the Government of Morocco's request (for SALSABILE) to change the rules of origin in the U.S.- Morocco Free Trade Agreement (USMFTA) for nineteen knit fabrics, they claim are not available in Morocco, nor from U.S. companies.

We object to the request, as Milliken can provide the knit fabrics subject to this request and we welcome the opportunity to discuss knit programs with executives at SALSABILE.

Milliken is a U.S. manufacturer of knit and woven fabrics, specialty chemicals and carpet - with headquarters in Spartanburg, South Carolina; employing more than 7,000 associates at 43 facilities worldwide.

Milliken's Hatch plant, located in Columbus, NC houses modern knitting equipment capable of producing a variety of unique fabric solutions. Our machinery has interchangeable cylinders which allows for speed, flexibility and a wide range of gauge options. The Milliken associates at the Hatch plant bring a breadth of knowledge and experience to the operation, which has been active as a knit facility for decades. According to the plant manager, Milliken can source yarns for the fabrics needed by SALSABILE for use in the U.S.- Morocco Free Trade Agreement and other free trade and preference programs.

The logo for Milliken & Company, featuring the word "Milliken" in a blue, cursive script font with a trademark symbol.

Currently Milliken produces one of the fabrics (highlighted below) listed in the November 6, 2017 Federal Register Notice. However, according to our knit fabric development team, we can provide all the knit fabrics listed in this request.

In conclusion, based on Milliken's ability to provide the specific apparel knit fabrics, we object to the request and look forward to opening channels of communication with SALSABILE. Please direct this communication to Steve Josey, head of business development for our knit fabric division (Steve.Josey@Milliken.com).

Again, thank you for the opportunity to comment on this request to change the rules of the U.S.-Morocco Free Trade Agreement.

Sincerely,



Jeff Price
President, Performance and Protective Textiles

MOROCCO'S REQUEST TO CHANGE THE RULES FOR KNIT FABRICS:

Knit apparel classified in chapter 61 of the Harmonized Tariff Schedule of the United States (HTSUS):

- Fabric 7: Dyed knit fabric of cotton (51-60%), rayon (30-40%), and nylon (4-10%), classified in subheading 6006.22 of the HTSUS.

Knit apparel and accessories classified in chapter 61 of the HTSUS, except babies' socks and booties of heading 6111 and hosiery of heading 6115:

- Fabric 8: Knit fabric of rayon (50-84%), polyester (14-49%), and elastomeric (1-10%), classified in subheadings 6004.10, 6005.41, 6005.42, 6005.43, 6005.44, 6006.41, 6006.42, 6006.43, and 6006.44 of the HTSUS;
- Fabric 9: Knit fabric of polyester (50-65%), rayon (30-49%), and elastomeric (1-10%), classified in subheadings 6004.10, 6005.36, 6005.37, 6005.38, 6005.39, 6006.31, 6006.32, 6006.33, and 6006.34 of the HTSUS;
- Fabric 10: Knit fabric of rayon (90-99%) and elastomeric (1-10%), classified in subheadings 6004.10, 6005.41, 6005.42, 6005.43, 6005.44, 6006.41, 6006.42, 6006.43, and 6006.44 of the HTSUS;
- Fabric 11: Knit fabric of rayon (51-84%) and polyester (16-49%), classified in subheadings 6005.41, 6005.42, 6005.43, 6005.44, 6006.41, 6006.42, 6006.43, and 6006.44 of the HTSUS;
- Fabric 12: Knit fabric of polyester (51-65%) and rayon (35-49%), classified in subheadings 6005.36, 6005.37, 6005.38, 6005.39, 6006.31, 6006.32, 6006.33, and 6006.34 of the HTSUS; and

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- **Fabric 13: Knit fabric of synthetic fiber (90-99%) and elastomeric (1-10%), classified in subheadings 6004.10, 6005.37, 6005.38, 6005.39, 6006.32, 6006.33, and 6006.34 of the HTSUS.**

Knit shirts; blouses; singlets; tank tops and similar garments; pullovers; sweatshirts; waistcoats (vests) and similar articles; tops; dresses; skirts; and divided skirts classified in headings 6104, 6105, 6106, 6109, 6110, and 6114 of the HTSUS:

- Fabric 19: Slub jersey fabric, other than warp knit, of rayon (92-98%), polyester (2-3%), and elastomeric (2-5%), weighing 150-200 g/m², classified in subheadings 6004.10 and 6006.42 of the HTSUS.

Upper body garments classified in headings 6105, 6106, 6109, and 6110 of the HTSUS:

- Fabric 17: Knit fabric of cotton (51-70%), rayon (33-49%), and elastomeric (2-7%), weighing up to 275 g/m², classified in subheadings 6004.10, 6006.21, 6006.22, and 6006.24 of the HTSUS.

Upper body garments classified in headings 6105, 6106, 6109, 6110, and 6114 of the HTSUS:

- Fabric 14: Knit jersey fabric, other than warp knit, of lyocell (44-50%), rayon (44-50%), and elastomeric (3-9%), weighing 150-220 g/m², classified in subheadings 6004.10 and 6006.42 of the HTSUS;
- Fabric 15: Slub jersey fabric of cotton (51-65%) and rayon (35-49%), weighing 120-225 g/m², classified in subheading 6006.22 of the HTSUS;
- Fabric 16: Knit jersey fabric, other than warp knit, of rayon (30-36%), acrylic (19-35%), polyester (27-33%), and elastomeric (3-8%), weighing 125-250 g/m², classified in subheadings 6004.10 and 6006.32 of the HTSUS; and
- Fabric 18: Knit jersey fabric, other than warp knit, of polyester (43-46%), rayon (43-45%), flax (5-9%), and elastomeric (4-5%), weighing 125-250 g/m², classified in subheadings 6004.10 and 6006.32 of the HTSUS.

Sweaters, pullovers, sweatshirts, waistcoats (vests) and similar articles, classified in heading 6110 of the HTSUS:

- Fabric 5: Dyed knit fabric of cotton (50-56%), acrylic (34-40%), and polyester (7-13%), classified in subheadings 6006.22 and 6006.32 of the HTSUS.

Sweaters, pullovers, sweatshirts, waistcoats (vests) and similar articles, classified in subheading 6110.30 of the HTSUS:

- Fabric 1: Knit fleece fabric of acrylic (67-73%) and viscose (27-33%), weighing 200-280 g/m², classified in subheading 6001.22 of the HTSUS;
- Fabric 2: Dyed knit fabric of nylon (52-58%), wool (27-33%), and acrylic (12-18%), classified in subheading 6006.32 of the HTSUS;
- Fabric 3: Dyed knit fabric of nylon (42-48%), viscose (37-43%), and wool (12-18%), classified in subheading 6006.32 of the HTSUS;
- Fabric 4: Dyed knit fabric of nylon (41-47%), wool (18-24%), acrylic (18-24%), and mohair (11-17%), classified in subheading 6006.32 of the HTSUS; and
- Fabric 6: Dyed knit fabric of polyester (57-63%), wool (27-33%), and nylon (7-13%), classified in subheading 6006.32 of the HTSUS.