



July 18, 2017

Chairman
Committee for the Implementation of Textile Agreements
Room 30003
U.S. Department of Commerce
Washington, DC 20230

VIA Electronic Submission to OTEXA_Bahrain_FTA@trade.gov

RE: Commercial Availability Request Under the U.S.-Bahrain Free Trade Agreement

Dear Chairman:

Hornwood, Inc. welcomes the opportunity to provide comments on the Commercial Availability Request Under the U.S.-Bahrain Free Trade Agreement notice issued in the Federal Register Volume 82, Number 97 on Monday, May 22, 2017. Hornwood has significant concerns regarding the availability supply of certain textiles as requested by the Government of Bahrain. These comments reflect our company's ability to produce fabrics domestically that are included within the request to revise the rules for certain knit and woven apparel. On behalf of Hornwood and our employees, I appreciate the opportunity to comment.

Hornwood, Inc. is a family owned company based in Lilesville, North Carolina. For over 70 years, our company has created and manufactured an extensive line of knit performance products for automotive, apparel, medical and industrial applications. Products manufactured in Lilesville are used by some of the most recognizable premium brands in the world, many of which are American-owned companies that prefer an American-made fabric solution.

Hornwood is one of the few remaining textile companies in the United States capable of bringing innovative performance-based products to market. Hornwood is currently expanding our capabilities and manufacturing capacity significantly. Over the next several months, the company will be adding over 100,000 square feet of manufacturing space and increasing circular knitting, dyeing, and surface finishing processes. Hornwood is investing over \$12.5 million dollars in this expansion in central North Carolina, a commitment rarely seen in the U.S. textile market.

As a leader in the domestic textile industry, Hornwood is committed to maintaining our ability to produce a wide variety of fabrics for diverse applications. As a result, our company maintains the ability to produce a large number of fabrics domestically in North Carolina. Upon Hornwood objects to this request from the Government of Bahrain on the ground that many of the products our company can produce are included among those named in the request.

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In the March 23 request letter from the Kingdom of Bahrain Ministry of Industry, Commerce, and Tourism, Minister Zayed Alzayani stated, "[T]his request is being made with regard to a list of thirty five fabrics that we understand are not available with the United States or Bahrain within the terms of Article 3.2.4."

Hornwood has the capability and machinery in Lilesville to produce several of the fabrics identified by the Kingdom of Bahrain. Hornwood can produce the following fabrics listed in the request in the United States in quantities to support necessary programs in a timely manner:

- #26: Knitted pile, looped fabric
- #27: Knit fabric of 85-97% polyester, 5-15% elastomeric
- #28: Knit fabric of 45-60% polyester, 35-50% cotton, 5-12% elastomeric
- #29: Knit fabric of 59-75% rayon, 20-37% nylon, 0-10% elastomeric
- #35: Knit fabric of 68-78% polyester, 19-29% rayon, 0-8% elastomeric

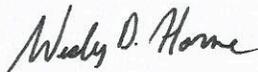
Granting Trade Preference Limits (TPL) to Bahrain for the above listed fabrics would negatively impact American-owned and operated textile companies. The basis on which Bahrain has submitted this request is that there are no American companies that can produce the fabrics listed in Minister Alzayani's letter.

As the President of Hornwood, Inc., I can attest that our company maintains the machinery and capability to produce these fabrics in the United States. Any preferential treatment for foreign-manufactured products that are currently commercially available from domestic manufacturers will have an immediate and long-term detrimental result for American companies.

For the reasons outlined above, Hornwood opposes this request and welcomes the opportunity to serve as resource for the Committee for the Implementation of Textile Agreements and the U.S. Department of Commerce. As a remaining domestic manufacturer of fabrics and textiles, we are uniquely qualified to assist the Committee and the Department in future deliberations.

Thank you for the opportunity to submit comments related to this request. Please contact me at any time should you have any questions or require any additional information regarding the products Hornwood is capable of producing domestically. I look forward to working with CITA in the future.

Sincerely,



Wesley D. Horne
President

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