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May 10, 2016

Mr. Joshua Teitelbaum, Chairman
Committee for the Implementation of Textile Agreements
Room 30003
U.S. Department of Commerce
14th & Constitution Avenue, NW
Washington, DC 20230

RE: Request from the Government of Morocco, on behalf of ARYANS, to modify the rules of origin for certain denim apparel articles (Federal Register Notice April 15, 2016)

Dear Mr. Teitelbaum,

Thank you for the opportunity to comment on the Government of Morocco's request to modify the US-Morocco Free Trade Agreement (USMFTA) to include four non-originating woven fabrics for use in certain exported denim apparel items.

Specifically, Milliken's comments refer to the following four fabrics:

Fabric 1: Denim Bi-stretch (cotton, polyester, elastane) - HTS 52094210
Fabric 2: Denim Bi-Stretch (cotton, polyester, elastane) - HTS 52094210
Fabric 3: Hyper Stretch Denim - Lagerta (cotton, polyester, elastane) - HTS 52094210
Fabric 4: New Altura Denim (cotton, polyester, elastane) - HTS 52094210

Milliken's two fabric divisions, Specialty Fabrics and Performance Products, manufacture an array of fabrics for fashion and workwear apparel, protective garments and industrial technical applications.

Our product offering includes denim fabrics Aryans claims are not produced in the United States. Polyester, cotton, elastane are mainstays of our apparel product offering. There currently exists production capacity at Milliken to deliver the quantities needed by Aryans of Morocco.

Additionally, we would draw your attention to some inconsistencies and ambiguities in the Aryans request. They list four fabrics, all classified at 5209.42.1000, however there is no such classification in the US Harmonized Tariff Schedule. They claim these

The logo for Milliken & Company, featuring the word "Milliken" in a stylized, cursive script font. A small trademark symbol (TM) is located at the bottom right of the logo.

four fabrics were added to the DR-CAFTA Short Supply list in 2007, but it is difficult for us to confirm this claim due to the tariff line inconsistencies. Further, the definitions of bi-stretch and hyper stretch - and the terms Lagerta and New Altura are confusing and require further technical description.

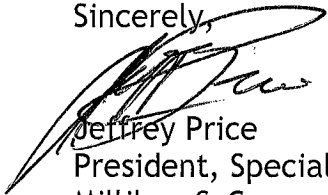
Milliken takes very seriously the process of amending a free trade agreement. We understand that Morocco's requested modifications do not require the due diligence exercise, associated with our Short Supply process. However, Aryans could have explored the availability of U.S. fabrics, prior to this request, with a phone call to the Department of Commerce - Office of Textiles and Apparel - or a basic internet search.

See <http://otexa.trade.gov/scripts/MadeInUSA.exe>

Based on Milliken's ability to provide these denim apparel fabrics, coupled with the inconsistencies and ambiguities in this request, we object to this modification and urge the Committee to reject this request. Amending the USMFTA will be detrimental to the U.S. companies who produce denim fabrics.

Thanks again for the opportunity to comment on this request.

Sincerely,



Jeffrey Price
President, Specialty Fabrics Division
Milliken & Company