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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  
14<sup>th</sup> & Constitution Avenue, NW  
Washington, DC 20230

RE: Request from the Government of Morocco, on behalf of CROSSINGS, to modify the rules of origin for certain 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 six non-originating woven fabrics for use in certain exported apparel items.

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

Fabric 1: 100% lyocell classified in HTSUS subheading 5516.11 and 5516.12  
Fabric 2: Lyocell/cotton classified in HTSUS subheading 5516.41, 5516.42 and 5516.43  
Fabric 3: Cotton/Polyester classified in HTSUS subheading 5210.49 and 5211.42  
Fabric 4: Cotton/Polyester/elastane classified under 5210.49 and 5211.4210

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

Additionally, we had some difficulty understanding the scope of this request. Crossings of Morocco claims their intention is to use the non-originating fabrics for end-items classified in subheading HTS 6206.40 and 6304.52, which covers women's

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cotton skirts and women's man-made fiber blouses. However, the list of products they include in their request letter represents many more apparel items - covering menswear, women's and children's products: pants, jackets, dresses and shirts. Thus, it is impossible for us to fully understand the total impact of the modifications.

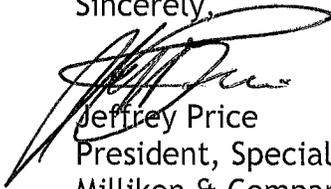
Milliken takes very seriously the process of amending a free trade agreement. We understand that Morocco's requested modifications do not require the due diligence exercise, associated with our Short Supply process. However, Crossings could have explored the availability of U.S. fabrics, prior to this 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 apparel fabrics, coupled with the 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 these fabrics.

Thanks again for the opportunity to comment on this request.

Sincerely,



Jeffrey Price  
President, Specialty Fabrics Division  
Milliken & Company