



May 2, 2016

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

Re: Commercial Availability Request under the U.S.-Morocco Free Trade Agreement-
Federal Register Notices of Friday, April 15, 2016

Dear Mr. Teitelbaum:

Mount Vernon Mills, Inc. is transmitting this letter in response to the Federal Register notices published on Friday, April 15, 2016, in which the Committee for the Implementation of Textile Agreements invited public comments on several commercial availability requests filed by the government of Morocco. Specifically, Mount Vernon wishes to comment on the following requests:

1. Request made on behalf of ARYANS regarding women's garments made with woven fabric containing 87-93% cotton, 5-9% polyester and 2-4% elastane classified in HTSUS 5209.42.
2. Request made on behalf of CROSSING for:
 - (a) Fabric 3- cotton/polyester fabric classified in HTSUS 5210.49 and 5211.42.
 - (b) Fabric 4- cotton/polyester/elastane classified in HTSUS 5210.49 and 5211.4210.

It is Mount Vernon's contention that each of the above-described fabrics can be provided by Mount Vernon in commercial quantities in a timely manner. Mount Vernon is a large manufacturer of a variety of apparel fabrics made of cotton, polyester, and blends of these fibers, including cotton/polyester fabrics containing elastane. We are making significant quantities of these fabrics in the United States currently, as we have for many years. We have the capacity to handle the additional volume that the petitioners might want.

Furthermore, we were not approached by the government of Morocco (or the companies on whose behalf the requests were made) inquiring about our availability to make these fabrics at our U.S. facilities. Had we been contacted, we would certainly have responded about our ability to make the fabric. Also, we understand that the U.S. textile trade organization, the National Council of Textile Organizations, was not contacted either, as they usually are with any requests regarding commercial availability of these fabrics domestically. Had NCTO been contacted, it is very possible that additional companies would have responded too. The necessary due diligence needed before filing a commercial availability request was not done in this case.

Based on the evidence of domestic production by established U.S. producers and the harm that approval of these petitions would inflict on U.S. producers and their suppliers, we respectfully urge CITA to reject these petitions. Thank you for the opportunity to comment, and let us know if you need further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. G. Cochrane', with a long horizontal line extending to the right.

Edward G. Cochrane

Vice President and Secretary