

Glen Raven Custom Fabrics



January 14, 2008

Mr. Matthew Priest
Chairman, Committee of the Implementation of Textile Agreements
U.S. Department of Commerce
14th & Constitution Avenue, N.W.
Room H3100
Washington, DC 20230

Re: Commercial Availability Request Under the North American Free Trade Agreement

Warp Pile Fabric, Cut of HTS 5801.35 made with Solution Dyed Acrylic Staple fibers of HTS 5503.30

Dear Mr. Priest:

Currently under NAFTA rules of origin, Warp Pile Fabrics, cut of HTS 5801.35 produced from imported (wet spun) acrylic fiber of 5503.30 do not make the required tariff shift to qualify as NAFTA originating.

Glen Raven Inc respectfully requests that the Committee for the Implementation of Textile Agreements (CITA) recommend a change to the NAFTA rules of origin for Warp Pile Fabric, of Man Made Fibers classified under 5801.35 of the Harmonized Tariff Schedule (HTS) and that, after consultation with Canada and Mexico, the President proclaim such change in accordance with 19 U.S.C. 3332(q)(3)(a) and Section 7(2) of Annex 300-B of the NAFTA.

The fiber in question is a synthetic staple fiber, not carded, combed or otherwise processed for spinning, acrylic or modacrylic, classified under subheading 5503.30.0000 of the HTSUS. It is solution dyed and is wet spun.

Glen Raven Inc. is a privately owned company with headquarters in Glen Raven, North Carolina. Glen Raven Inc is a manufacturer and distributor of solution dyed acrylic fabrics. Prior to 2005, Solutia Inc was the only solution dyed acrylic producer in the United States. In January of 2005, Solutia announced that they intended to exit the acrylic fiber business and in April of 2005, Solutia ceased production of this fiber. Cydsa in Mexico was the only other producer of solution dyed acrylic fiber in North America. They halted the production of acrylic fiber in early 2006. Based on Glen Raven's knowledge and experience in the textile market, we know of no other producers in North America of solution dyed acrylic staple fiber.

This solution dyed acrylic staple wet spun fiber is a critical raw material in the production of 90% of all woven fabrics produced by Glen Raven Custom Fabrics LLC.

Please contact me direct if you have questions or need further information. Thank you in advance for your consideration of this request.

Sincerely,

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