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COMMERCIAL AVAILABILITY REQUEST

August 5, 2009

Ms. Janet Heinzen
Acting Chair, Committee for the Implementation of Textile Agreements
Office of Textiles and Apparel, Room H3100
U.S. Department of Commerce
14th and Constitution Ave., NW
Washington, DC 20230

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

On behalf of Cintas Corporation (“Cintas”), Sorini, Samet & Associates, LLC (“SS&A”) respectfully requests that the U.S. Committee for the Implementation of Textile Agreements (“CITA”) recommend a change to the North American Free Trade Agreement (“NAFTA”) rule of origin for articles of apparel and clothing accessories, not knitted or crocheted, using certain yarn-dyed poplin fabric classified under Harmonized Tariff Schedule of the United States (HTSUS) subheading 5513.31, and that, after consultations with the Governments of 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 result of the requested change in the NAFTA rules of origin would allow apparel goods of HTSUS Chapter 62, manufactured in NAFTA countries from the fabric described in Annex I of this submission (“subject fabric”) of any origin, to qualify as an originating good under the Agreement.

Russell Corporation (“Russell”) of Alabama was the previous supplier of the subject fabric to Cintas until it terminated its supply, and before that Dan River, which also has ceased operations, also supplied the subject fabric to Cintas. The Russell fabric was manufactured into uniform apparel in Mexico and then imported into the United States as an originating good under the rules of origin of the NAFTA. Recently, Russell notified Cintas that it is no longer accepting orders of this fabric. With the Russell supply terminated, the subject fabric is not currently available in commercial quantities in a timely manner from a supplier in the NAFTA countries.

Cintas contracts uniform apparel manufacturing from facilities worldwide, and Cintas prefers to retain a significant amount of production in Mexico. With its NAFTA fabric

supply recently terminated, however, Cintas will be compelled to shift production out of the region if it cannot source the subject fabric from third parties and have the final products qualify as originating goods under the NAFTA.

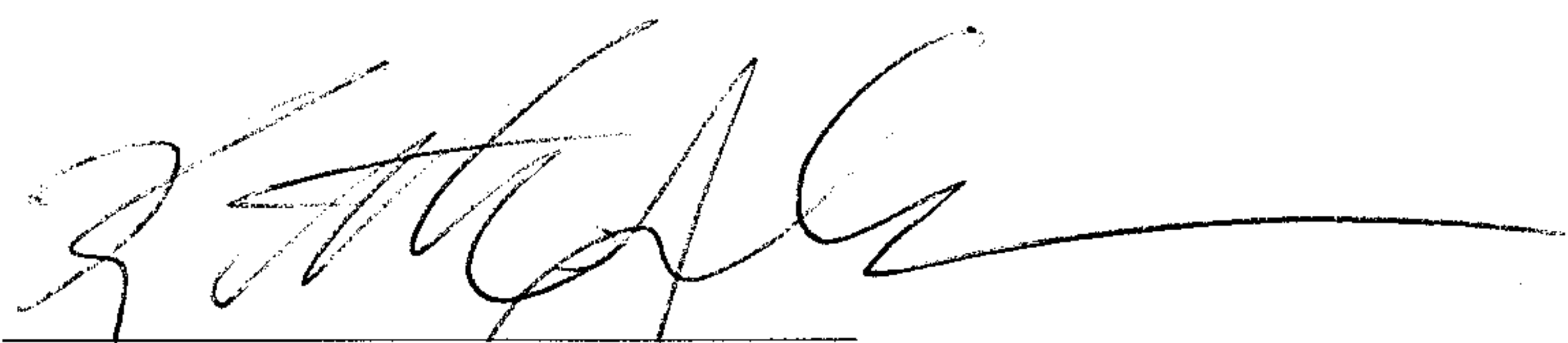
CITA determined on June 29, 2009 that the subject fabric is not available in commercial quantities in a timely manner from a supplier in the countries party to the U.S.-Central America-Dominican Republic Free Trade Agreement (“CAFTA-DR”).¹ In the course of the due diligence for the CAFTA-DR submission, Cintas contacted the major U.S. fabric mills and U.S. trade associations, but no companies indicated a capability or interest to supply the subject fabric.

Further, from its many years of experience in the Western Hemisphere, Cintas is very familiar with the capabilities of Canadian and Mexican fabric suppliers. Cintas has explored business with potential suppliers in these countries, but no companies have indicated a capability or interest to supply the subject fabric.

It is with a sincere motivation to remain a producer of certain apparel in Mexico that Cintas requests a change to the NAFTA rules of origin to allow the subject fabric of any origin in the production of apparel, which would ultimately qualify as an originating good under the Agreement.

If you have any questions or require further information with regard to this Request, please contact Keith Jenkins at (202) 393-4483, or kjenkins@ssa-dc.com.

Sincerely,



Keith A. Jenkins
Senior Director of Government Affairs

8/5/09
Date

¹ 120.2009.05.15.Fabric.SS&AforCintasCorp

ANNEX I

SUBJECT FABRIC DESCRIPTION

The subject fabric is a ring-spun, woven polyester/cotton blend, with a unique combination of finishing processes and chemistries, which are critical for the end-use of industrial, career and work uniforms. Cintas requires that the subject fabric meet the specifications below in order to achieve the proper life-cycle performance in the work setting as well as in repeated harsh commercial processing.

All figures listed are in metric units:

Fabric Type	Yarn Dyed Plaid Poplin
Fiber Content	64% to 67% polyester; 33% to 36% cotton
Yarn Size, Warp	Ring spun 49/1 to 53/1 metric: 64% to 67% polyester; 33% to 36% cotton
Yarn Size, Filling	Ring spun 49/1 to 53/1 metric: 64% to 67% polyester; 33% to 36% cotton
Thread Count	34.5 to 38 ends x 21 to 23 picks per centimeter
Weave Type	Plain
Fabric Weight	127 to 140 grams per square meter
Fabric Width	156 to 170 centimeters, cuttable
Coloration	Warp stripes, filling yarns dyed multiple colors
Finishing Processes	Moisture management (see performance criteria), pre-cure permanent press, 10% mechanical stretch in filling direction
Performance Criteria	Moisture management test method is AATCC Test Method 79-2007, and the pass/fail standard is 10 seconds
HTSUS	5513.31