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July 13, 2017

Chairman  
Committee for the Implementation of Textile Agreements  
Room 30003  
United States Department of Commerce  
Washington, DC 20230

Submitted via email to  
[OTEXA\\_Bahrain\\_FTA@trade.gov](mailto:OTEXA_Bahrain_FTA@trade.gov)  
[Terry.Labat@trade.gov](mailto:Terry.Labat@trade.gov) and [Maria.D'Andrea-Yothers@trade.gov](mailto:Maria.D'Andrea-Yothers@trade.gov)

To Whom It May Concern:

**Subject:** Request for Public Comment on a Commercial Availability Request Under the U.S.-Bahrain Free Trade Agreement

Thank you for the opportunity to comment on the Government of Bahrain's request to change the rules of origin in the U.S. Bahrain Free Trade Agreement (USBFTA) for 35 woven and knit fabrics, they claim are not available from U.S. companies.

Milliken is a U.S. manufacturer of knit and woven fabrics with headquarters in Spartanburg, South Carolina; employing more than 7,000 associates at 43 manufacturing facilities worldwide.

It is our understanding that the rule change Bahrain seeks would effectively replace the Tariff Preference Level (TPL) of 65 million square meter equivalents (soon to expire) with a "short supply" list of fabrics Bahraini companies claim are not manufactured in either Bahrain or the United States.

We have many concerns regarding the request and for the reasons listed below, we object to the rule change sought by Bahrain.

- The change requested would grant duty-free access to the U.S. of unlimited quantities of Bahraini apparel and home furnishings, made of non-compliant (third-country) fabrics.
- The change ignores the yarn-forward rule of origin for compliant fabrics – the cornerstone of the Bahrain agreement and most U.S. free trade agreements (FTA).
- The change proposed closely tracks the "short supply" list in the TransPacific Partnership (TPP) Agreement, but encompasses even more fabrics, because the fabric descriptions include much wider ranges of construction. Bahrain was not party to the TPP agreement and should not be entitled to this negotiated provision.\*
- The change requested would set a precedent and encourage other FTA partners to request similar treatment – with negative economic consequences for the U.S. textile industry

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However, the primary reason Milliken objects to Bahrain's proposal is because we are able to provide many of the fabrics included in their request. Following is a breakdown of fabrics (knit and woven) Milliken is currently making, has the ability to provide and is not able to provide.

**We are currently providing** Knit Apparel Fabrics classified in Chapter 61 of HTSUS:

Fabric 27

**We are capable of providing** Knit Apparel Fabrics classified in Chapter 61 of HUSUS:

Fabric 28      Fabric 29      Fabric 35

**We are currently providing** Woven Fabrics for Men's & Boys Trousers classified in Chapter 62 (heading 6203):

Fabric 25      Fabric 32      Fabric 33

**We are capable of providing** the following woven apparel fabrics for apparel in Chapter 62

Fabric 13      Fabric 15      Fabric 18      Fabric 19      Fabric 20  
Fabric 21      Fabric 22

**We are capable of providing** the following woven fabrics for Men's & Boys Trousers – Chapter 62 (heading 6203)

Fabric 1 Fabric 2 Fabric 3 Fabric 4 Fabric 5 Fabric 9 Fabric 10 Fabric 11  
Fabric 14 Fabric 30 Fabric 31 Fabric 34

**We are not able to provide:**

Fabric 6 – indigo dyed fabric  
Fabric 7 – cotton corduroy  
Fabric 8 – Polyester corduroy  
Fabric 12 – Spun modal rayon  
Fabric 16 – woven seersucker  
Fabric 23 - 2-way stretch cotton  
Fabric 24 – 2-way stretch cotton  
Fabric 26 – Knit pile fabric  
Fabric 31 – 2-way stretch cotton  
Fabric 34 – linen

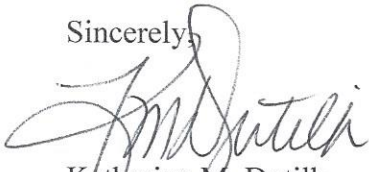
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We urge the Committee for the Implementation of Trade Agreements (CITA) to carefully examine the Bahrain request in light of the reservations stated in these comments and Milliken's ability to provide fabrics.

We look forward to the opportunity to meet the representatives of MRS, Ambattur and Noble. Please be in contact with Kathi Dutilh at this email address: [KDutilh@MillikenDC.com](mailto:KDutilh@MillikenDC.com) to initiate contact with Milliken's knit and woven businesses.

Sincerely,



Katherine M. Dutilh  
Manager, Government Relations  
Milliken

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