



Chairman
Committee for the Implementation of Textile Agreements
Room 3001, U.S. Department of Commerce
14th and Constitution Avenue NW
Washington, DC 20230

1/5/2016

Dear Sir:

This letter is in response to the request by AEO on the US-MOROCCO FTA. The notice states that “CITA hereby solicits public comments on this request, in particular with regard to whether 100% rayon woven fabric of Harmonized Tariff Schedule of the United States (HTSUS) subheading 5408 can be supplied by the U.S. domestic industry in commercial quantities in a timely manner.”

The woven fabric described by this tariff code is very general and can certainly be made in the United States. The descriptive term that is used in the heading, “Viscose Rayon” may be misleading because there are many different types of rayon. Tencel, Modal, Lyocell, to name a few, are acceptable replacements for viscose rayon and are readily available.

In most cases, the petitions for short supply are based on cost more so than on lack of availability or capacity. The question of “timeliness” would need to be addressed. In any woven fabric request, a reasonable amount of time is required to acquire yarn, prepare the yarn and then enter it into a weaving production environment. The “reasonable amount of time” may be a difference of opinion rather than a fact. In any event, we would welcome an opportunity to quote on the fabric requirement and are reasonably sure that we have the capability to supply.

Therefore, we object to this petition as being unfounded and not based on any facts or adequate research on the part of the requestor.

Sincerely,

J.M. Hopkins
HAMRICK MILLS