BURLINGTONWORLDWIDE

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July 22, 2010

Ms. Kimberly Glas
The Committee for the Implementation of Textile Agreements
U.S. Department of Commerce
Room 3001A
Washington, DC 20230

RE: Response in a CAFTA Commercial Availability Proceeding
File # 146.2010.07.08.Fabric.SoriniSametforBWA

Dear Ms. Chairman:

Burlington WorldWide is a leading manufacturer of woven textile fabrics utilized by the apparel trade. Burlington WorldWide has a Joint Venture with Insinca, S.A., a leading manufacturer of poly/rayon woven fabrics located in El Salvador. Insinca has manufactured approximately 20 million square meters of poly/rayon fabrics over the past 24 months within their manufacturing facility. Insinca has both piece dye and package dye capabilities, and currently services a large school uniform business that requires yarn dyed woven fabrics. Burlington WorldWide is responding to this request on behalf of both Burlington WorldWide and Insinca.

Rayon fiber is a manufactured fiber composed of regenerated cellulose. The cellulose is derived from wood pulp, cotton linters, or other vegetable matter that is dissolved into a viscose spinning solution. Standard lyocell fiber is a manufactured cellulose fiber made by direct dissolution of wood pulp in an amine oxide solvent. The FTC granted lyocell a generic description in order to separate it from rayon because the manufacturing process to make lyocell is more environmentally friendly than that of standard rayon. However, the yarn spinning, weaving, dyeing, and finishing process for fabrics containing lyocell and rayon is exactly the same.

Insinca has access to standard lyocell staple fiber, has the ability to spin this staple fiber into a 100% lyocell yarn, has the ability to blend this lyocell staple fiber with synthetic staple fibers, and has the ability to combine lyocell spun yarns with man-made filament yarns. Insinca also has the ability to package dye these yarns. Insinca has the capacity to manufacture 10 million square meters of poly/rayon or poly/lyocell fabric per year. Insinca will utilize ring spinning to manufacture single or plied yarns, all weaving will utilize rapier looms and all standard piece dye and package dye equipment is utilized in the dyeing and finishing processes. Insinca's standard development lead time is 12 to 14 weeks, and Insinca's production lead time is 12 to 14 weeks on commercial products.

During the course of due diligence, Keith Jenkins of Sorini, Samet, & Associates, LLC sent an email to a sales representative from Burlington WorldWide named Hal Baner. Hal Baner's responsibility as a sales representative is to sell the products Burlington WorldWide has developed and placed into our collection. Hal Baner did confirm Burlington WorldWide's collection did not include lyocell fabrics. However, neither Keith Jenkins nor BWA ever asked if we were able to develop a lyocell fabric, and they never requested to speak with our merchandising and product development areas.

During the course of due diligence, according to the filing emails were sent to Oscar Vidal Palma of Insinca. Oscar Vidal Palma is the Vice President of Manufacturing for Insinca. Oscar has had various issues with his email communications over the past year. Oscar has lost many emails as Insinca has attempted to correct his computer issues. However, email communication is not a high priority for Oscar as he is not responsible for any external communications. Therefore, these emails were not received by Oscar Vidal Palma. Oscar is not the correct contact for production inquiries. The correct contact is Henrry Campos.

Insinca is capable of manufacturing woven fabrics containing package dyed 100% standard lyocell staple fibers, 55 to 85% standard lyocell / 15 to 45% synthetic staple fibers, and 55 to 85% standard lyocell staple fibers / 15 to 45% man made filament yarns in commercial quantities.

Respectively submitted,

Patrick Palmer,
Executive Vice President
Burlington WorldWide