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Telephone: 706-569-0404/Fax: 706-565-3377/www.denimna.com

PUBLIC VERSION

May 27, 2008

Chairman,
Committee for the Implementation of
Textile Agreements (CITA)
U.S. Department of Commerce
14th Street & Constitution Avenue, N.W.
Room H3100A
Washington, D.C. 20230

**Re: Response to 119.2009.05.13 – Certain Denim Classifiable under
HTS Number 5209.42.00 - Request under the Commercial Availability
Provision of the Dominican Republic-Central America-United States
Free Trade Agreement Implementation Act**

Dear Mr. /Madam Chairman:

Denim North America submits this Response with an Offer to Supply to the request for a commercial short supply designation for certain denim fabric under Request Number 119.2009.05.13. Denim North America can supply the subject product, meeting all specifications, in commercial quantities in a timely manner.

Our company is the leading manufacturer of stretch denim in the United States and its denims are known for their innovative constructions and high performance. Customers for our denim currently include [*****].

Over the past two years, Denim North America has produced over [**] million square meters of stretch denim that falls within the weight specifications of the fabric described in the request. Our denim is produced on our Picanol air-jet looms that are ideally suited for weaving denim. They have been used for this purpose for the past 10 years and operate at high efficiencies.

In order to meet the specifications for the requested fabric EXACTLY, some modifications are required and these can be easily made. Certain yarns will have to be obtained from our current US supplier and those yarns will be CAFTA/DR qualifying. Some new reeds for the looms will be needed and these are readily available from current suppliers and easily installed. Denim North America can make these changes quickly to meet the customer's time for delivery.

In the past 24 months Denim North America has produced over [**] million square meters of stretch denim of various types at its Columbus, Georgia facility. Currently, stretch denim accounts for [**] percent of our total denim production and for the past 2 years it has averaged [**] percent, but we have the ability and capacity to shift significant additional production to stretch denim and would do so to meet any new orders. If demand warrants, we can readily shift 100 percent of our production capacity to stretch denim.

Had American Design Industries contacted us before its request to CITA was made, Denim North America would have responded with an offer to supply the fabric that is described in this request in the quantity that is requested and within the customer's timeframe.

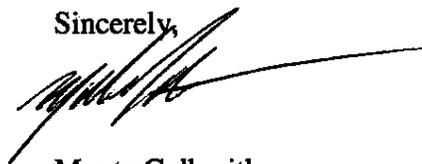
On May 7, 2009, we received an inquiry from NRG Corp., a company not previously known to us, with a request to supply fabric that meets the specifications of the subject request of American Design Industries. All of NRG's fabric specifications match the subject fabric, except that the fabric weight is at the mid-point of the range in American Design Industries request.

In Exhibit A (attached) we show the chain of email messages between Denim North America and NRG Corp. The exhibit shows that our company responded within one hour to the inquiry, continued to exchange emails until 9 pm on the evening of the 7th and, at that time, indicated that we could make the subject fabric specified by NRG Corp. Unfortunately, we heard nothing further from NRG Corp. While unlikely, this inquiry may be unrelated to the request made by American Design Industries, but regardless, it does demonstrate my company's willingness and quick response to an inquiry seeking stretch denim that meets the specifications of the subject fabric.

We are ready to make such an offer now to supply in a timely manner the quantity of fabric being sought and ask that CITA deny the short supply request.

Please contact me if you have any questions.

Sincerely,



Monte Galbraith
President

Attachment

Exhibit A

E-mail Exchanges between Denim North America
and NRG Corp on May 7, 2009

From: Jennifer Harrison [mailto:jharrison@denimna.com
<mailto:jharrison@denimna.com>]

Sent: Thursday, May 07, 2009 3:44 PM
To: 'Bill Lunsford'
Subject: FW: fabric supplier

Bill,
Please see below.

Jennifer Harrison
Customer Service
Denim North America
1 Marubeni Drive
Columbus, GA 31907
p. 706-565-3321
f. 706-565-3377
email: jharrison@denimna.com <mailto:jharrison@denimna.com>
Please visit our website @ www.denimna.com <http://www.denimna.com>

From: NRG Corp [mailto:nrgcorp@gmail.com <mailto:nrgcorp@gmail.com>]
Sent: Thursday, May 07, 2009 2:52 PM
To: jharrison@denimna.com <mailto:jharrison@denimna.com>
Subject: fabric supplier

Dear Jennifer,

this is the fabric we are specifically looking for 900,000 yards for the rest of the year:

Fabric content: 96%-98% cotton 4%-2% spandex;
Yarn Count 22.0/1MC;27.0/1MC;
43 warp ends/cm.;
20 filling picks/cm.;
345.9 gm./sq. meter;
132.08-137.16 cm. width;
weave type: Twill Weave.
Dye Type: Vat (Indigo)
Stone Washed
Yarn Dyed

Please confirm if you may supply this fabric,
Thank you

On Thu, May 7, 2009 at 3:46 PM, Bill Lunsford <blunsford@denimna.com
<mailto:blunsford@denimna.com> > wrote:

Good afternoon.

Per your inquiry, Denim North America is a U.S. producer of a wide range of denim fabrics including stretch. In the weight range of 9 to 10.5 oz., following are some examples of stretch styles we produce containing cotton/spandex:

92602 'Amalfi'; 9 oz. 3/1 RHT; 23% stretch; 'Edisto' surface dyed dark pure indigo shade
92603 'Detox'; 9.5 oz. 3/1 RHT; 21% stretch; 'Pure' 18% indigo shade
93111 'Vamp'; 10 oz. 2/1 RHT; 25% stretch; 'Pure' 18% indigo shade
93705 'La Brea'; 10 oz. 3/1 LHT; 18% stretch; 'Black/Blacktop' black yarn dyed then overdyed
93109 'Rattle'; 10.5 oz. 2/1 RHT; 15% stretch; 'Mariner' 18% indigo with heavy black sulfur top
93612 'Adrenaline'; 10.5 oz. 3/1 RHT; 32% stretch; 'Mariner' 18% indigo with heavy black sulfur top

The product closest to the construction you mentioned in your email is 92602 'Amalfi'. As we may assist, please feel free to contact me.

All the best,

Bill Lunsford

706-565-3324 (office
& forward to cell)
706-565-3377 (fax)

One Marubeni Drive
Columbus, Georgia
31907 USA

-----Original Message-----

From: NRG Corp
To: Bill Lunsford
Sent: May 7, 2009 4:43 PM
Subject: Re: NRG Corp/Denim North America/Indigo Stretch

Bill thank you for your email. Can your company make the exact fabric we are requesting?

-----Original Message-----

To: NRG Corp

Sent: May 7, 2009 9:09 PM

Subject: Re: NRG Corp/Denim North America/Indigo Stretch

Yes, this is possible. We will need to source the corespun yarn in the proper count as well as purchase the reed necessary.

Please advise the quantity needed, target price and desired stretchability. Your specifications make no mention of specific twill type: 2/1 or 3/1, RHT, LHT or Broken Twill.

As we may assist, please feel free to contact me.

All the best,

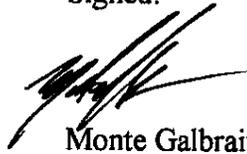
Bill Lunsford

INTERESTED PARTY'S DUE DILIGENCE CERTIFICATION

I, Monte Galbraith, President, Denim North America certify that:

- I have read the attached submission, and
- The information contained in the submission is, to the best of my knowledge, complete and accurate.

Signed:

A handwritten signature in black ink, appearing to read 'Monte Galbraith', written over a horizontal line.

Monte Galbraith

Date: May 19, 2009