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September 26, 2011

PUBLIC VERSION

Kim Glas, Chair
Committee for the Implementation of Textile Agreements
U.S. Department of Commerce
Room H3001A
14th Street & Constitution Avenue, N.W.
Washington, D.C. 20230

**Re: Petition Regarding the Commercial Availability of Certain
Cotton/Nylon/Spandex Raschel Knit Open Work Crepe Fabric**

Dear Ms. Glas:

On behalf of our client, Hansae Co., Ltd. ("Hansae") we hereby submit this request for a finding of commercial non-availability pursuant to the provisions of Section 203(o)(4) of the Dominican Republic-Central America-United States Free Trade Agreement ("the Agreement") Implementation Act and CITA Final Procedures for implementing Section 203(o)(4) contained in CITA's Federal Register notices of March 15, 2007 and the Modifications to Procedures of September 12, 2008 (hereinafter "Procedures") with respect to certain fabric, described in the Annex attached to this request, to be used in the manufacture of apparel in a CAFTA-DR country. We respectfully request that the subject fabric described in the Annex be added to the list in Annex 3.25 of the Agreement in unrestricted quantity because the fabrics are not available in commercial quantities in a timely manner from a supplier in the CAFTA-DR countries.

(1) Detailed Product Information

The Annex provides in detail: fiber content, construction, yarn size, and finishing processes; and the classification of the product under the HTSUS. The fabric in question is cotton/nylon/spandex open knit work crepe fabric classifiable under HTSUS subheading 6005.32.00 (solid) and 6005.34.00 (print).

The product specifications, including, fiber content, construction, yarn size, and finishing processes and performance characteristics are reasonable and stated in terms of accepted terminology and standards.



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We note that the subject fabric is substantially similar in construction to existing fabrics previously determined by CITA to be unavailable in commercial quantities in a timely manner from a supplier in the CAFTA-DR countries and are contained in Annex 3.25.¹

These standards and specifications were explained to all potential suppliers.

Timing was expressed as the annual quantity being supplied during a seven month period.

(2) Quantity

Hansae requires approximately [*****] square meters each calendar year on the following schedule:

- [*****] square meters by June 1
- [*****] square meters by July 1
- [*****] square meters by August 1
- [*****] square meters by September 1
- [*****] square meters by October 1
- [*****] square meters by November 1
- [*****] square meters by December 1

(3) Due Diligence

(i) Generally

The following is a summary of Hansae's contacts and due diligence that demonstrates its legitimate intent, and good faith and reasonable efforts to obtain the subject fabrics from CAFTA-DR suppliers. We note that despite our best efforts to provide contact names, titles and addresses for each company, in some circumstances we were unable to find or verify some of this information as the contacts were made entirely via email or facsimile based on the best information available. See note 2, *infra*.

Hansae directly contacted all potential suppliers to locate sources for the subject fabrics, as well as the industry associations in all CAFTA-DR countries. No company indicated that they could supply the subject fabric.

Details of the salient points of Hansae's communications with the various companies and trade associations in the region with regard to whether they or their members could supply the subject fabric within the specifications described in the Annex to this submission are described below.² Copies of the contacts are provided in the attachment of the confidential version of this submission.

¹ See CITA Reference Numbers: 130.2009.08.21.Fabric.ST&RforHansae and 101.2008.12.01.Fabric.SoriniSametforHansoll; 100.2008.12.01.Fabric.SoriniSametforHansoll; and 83.2008.08.08.Fabric.SoriniSametforHansoll.

² Titles of the individuals contacted are listed in all cases where they are known. Contact information for some of the companies was provided by the relevant industry association. However, none of the associations provided titles with



INDUSTRY ASSOCIATIONS

Association: **Adozona**
Contact(s): José M. Torres, Executive Director (adozona@codetel.net.do)
Address: AV. Sarasota #20, 4to. Piso,
Torre Empresarial AIRD,
Apartado Postal 3184
Santo Domingo, R.D.

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {A1}
07/04/2011: Second request. {A2}
07/27/2011: Third request. {A3}

No responses received.

Association: **American Manufacturing Trade Action Coalition**
Contact(s): Sara Ormand, Director of International Trade
(sormand@amtadc.org)
Lloyd Wood, Director of Membership and Media Outreach
(lwood@amtadc.org)
Address: 910 16th Street, N.W., Suite 760
Washington, D.C. 20006

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {B1}
06/28/2011: Association advised it had forwarded the inquiry to its members and asked for a photo of the fabric at the request of a member. {B2}
06/28/2011: Hansae provided photographs of the subject fabric. {B3}
06/28/2011: Association advised that it sent the photographs to its member and would let Hansae know once the member responded. {B4}
07/27/2011: Hansae requested follow-up regarding previous inquiries. {B5}

No further responses received.

that contact information. Hansae contacted the individuals recommended by the applicable associations and/or the contact person with whom they typically correspond with for business purposes.



Association: **Costa Rican Chamber of Textiles**
Contact(s): Annia Sequra, Director (asegura@textilescr.com)
Address: Apartado 1512 1002 Pase de Estudiantes
San Jose, Costa Rica

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {C1}
06/29/2011: Association advised that no companies in Costa Rica produce the subject fabric. {C2}

Association: **Guatemala Apparel and Textile Association (VESTEX)**
Contact(s): Luis Oscar Estrada, Manager (lestrada@apparel.com.gt)
Address: 15 Avenida 14-72 zona 13 2ndo. Nivel
Guatemala, Guatemala C. A 01013

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {D1}
06/29/2011: Association forwarded contact information for two companies that may be able to produce the subject fabric (Textiles Perfecta and Imperialtex). {D2} After further inquiries directly with each of the companies, it was determined that neither could produce the subject fabric. See description of due diligence correspondence below and at Exhibits {AL} and {BF}.

Association: **Honduran Manufacturers Association**
Contact(s): Ernesto Interiano, Executive Director (direcciontecnica@ahm-honduras.com)
Angela Castillo (servicioalcliente@ahm-honduras.com)
Address: Edificio Yude Canahuati 3 y 4 Piso, Avenida Circunvalacion S. O.
Apartado Postal 2658
San Pedro Sula, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {E1}
07/04/2011: Second request. {E2}
07/27/2011: Third request. {E3}

No response received.

Association: **National Council of Textile Organizations**
Contact(s): Michael Hubbard, Vice President (mhubbard@ncto.org)
Address: 910 17th Street, NW, Suite 1020
Washington, D.C. 20006

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {F1}



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06/29/2011: Association advised it would forward inquiry to all members. {F2}

07/27/2011: Hansae requested follow-up information regarding previous inquiries. {F3}

No response received.

Association: ***National Textile Association***

Contact(s): David Trumbull, Vice President International Trade
(dtrumbull@nationaltextile.org)

Address: 6 Beacon Street, Suite 1125
Boston, MA 02108

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {G1}
06/28/2011: Association advised it had circulated the inquiry with a request to respond by July 12. {G2}
07/27/2011: Hansae requested follow-up information regarding the ability of any association members to produce the subject fabric. {G3}
08/05/2011: Association advised that no member expressed interest in producing the subject fabric. {G4}

Association: ***Nicaraguan Textile Association (Anitec)***

Contact(s): Dean Garcia, Executive Director (director@anitec.net)

Address: Zona Franca "Las Mercedes" km 12 ½ Carretera Norte, Building #29
Managua, Nicaragua

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {H1}
07/04/2011: Second request. {H2}
07/04/2011: Association advised that it forwarded Hansae's inquiry to its members. {H3}
07/27/2011: Hansae requested follow-up information regarding the ability of any association members to produce the subject fabric. {H4}

No further response received.



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Association: *El Salvador's Chamber of Textiles and Apparel (CAMTEX)*
Contact(s): Patricia Figueroa, Executive Director (direccion@camtex.com.sv)
Mauricio Rodriguez, Manager (mrodriguez@camtex.com.sv)
Lourdes Avelar, Data Analyst (lavelar@camtex.com.sv)
Address: Calle Liverpool y Roma, edificio ASI
San Salvador, El Salvador

Reply and Date: 06/27/2011: Initial inquiry regarding members' ability to produce subject fabric. {I1}
07/04/2011: Second request. {I2}
07/04/2011: Association advised that it would contact Hansae regarding its inquiry shortly. {I3}
07/05/2011: Association indicated it is consulting with its member company regarding their ability to produce the subject fabric. {I4}
07/27/2011: Hansae requested follow-up information regarding the ability of any association members to produce the subject fabric. {I5}
07/27/2011: Association advised that two member companies (Darlington and Nemtex) may be able to produce the subject fabric. {I6} After further inquiries directly with each of the companies, it was determined that neither could produce the subject fabric. See description of due diligence correspondence below and at Exhibits {K} and {L}.

COMPANIES:

El Salvador:

Company: *Exportadora Textufil, S.A. de C.V.*
Contact(s): Hector Rico (hector@textufil.com / info@textufil.com)
Address: 12 Av Aur Contiguo A Ind Caribe-Sa Soyapango San Salvador SV

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {J1}
07/15/2011: Second request. {J2}
07/27/2011: Third request. {J3}

No response received.

Company: *Darlington Fabrics – El Salvador, LTDA. DE C.V. / George C. Moore Co.*
Contact(s): Baltazar Quezada (bquezada@dfabrics.com)
Carol Gross, National Sales Manager, Darlington Fabrics/George C. Moore Co. (cgross@dfabrics.com)
Address: American Industrial Park, Block M, KM. 36 Carretera Santa Ana.



Reply and Date: 07/28/2011: Initial inquiry regarding company's ability to produce subject fabric. {K1}
08/09/2011: Second request. {K2}
08/09/2011: Association advised that Carol Gross, Darlington Fabrics / George C. Moore's National Sales Manager would respond to Hansae's request. {K3}
08/10/2011: Hansae's third request {K4}
08/11/2011: Company indicates that it is not able to produce the subject fabric. {K5}

Company: *Nemtex, S.A. de C.V.*
Contact(s): Francisco Miguel (f.m.reinhardt@nemtex.com)
Address: Calle Antigua A San Antonio Abad, San Salvador, El Salvador

Reply and Date: 07/28/2011: Initial inquiry regarding company's ability to produce subject fabric. {L1}
08/09/2011: Second request. {L2}

No response received.

Company: *ICAT, S.A. de C.V.*
Contact(s): Antonio Rivas, Title Unknown (icatsa@navegante.com.sv)
Address: KM 12 1/2 Carretera Troncal, Del Norte
Apopa, San Salvador

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {M1}
07/15/2011: Second request. {M2}
07/27/2011: Third request. {M3}

No response received.

Company: *Rayones de El Salvador, S.A. de C.V.*
Contact(s): Oscar Safie (oscar-safie@rayones-hilaexport.com.sv)
Address: Km. 11 Carr Panamericana, Ilopango, San Salvador, El Salvador

Reply and Date: 06/26/2011: Initial inquiry regarding company's ability to produce subject fabric. {N1}
06/28/2011: Company advised that it could not produce the subject fabric {N2} and suggested contacting Darlington Fabrics or George C. Moore Co. After further inquiries directly with the National Sales Manager for the related companies, it was determined they could not produce the subject fabric. See description of due diligence correspondence above and at Exhibit {K}.



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Company: *Pettenati Centro America S.A. de C.V.*
Contact(s): Claudia Villacorta, Customer Service Coordinator Commercial
Address: Department (cvillacorta@pettenati.com.sv)
KM 42 Carretera a Santa Ana
Coatepeque, santa ana, El Salvador

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {O1}
07/14/2011: Second request. {O2}
07/15/2011: Company advised that it could not produce the subject fabric. {O3}

Guatemala:

Company: *America Textile (AMETEX)*
Contact(s): Marco Tulio Bautista, General Manager
Address: (americatextil@inteln.net.gt)
43 Calle 19-66 Zona 12, Guatemala, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {P1}
07/15/2011: Second request. {P2}
07/27/2011: Third request. {P3}

No response received.

Company: *Broadcloth*
Contact(s): Wilfredo Garcia Sanchez, Contact (textil@liztex.com)
Address: Parques del Lago, KM 305 Carretera al Pacifico amatitlán,
Guatemala C.A, Guatemala

Reply and Date: 07/03/2011: Initial inquiry regarding company's ability to produce subject fabric. {Q1}
07/04/2011: Company advised that it could not produce the subject fabric. {Q2}

Company: *Confecciones Anice (Conamsa)*
Contact(s): Munir Massis, General Manager (fax: 502-2251-1445)
Address: 21 Av. 9-47 Zona 11, Colonia Mirador 1, Guatemala, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {R1}
07/15/2011: Second request. {R2}
07/27/2011: Third request. {R3}

No response received.



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- Company:** *Empresa Industrial Cantel*
Contact(s): Pablo Garcia Salas, General Manager (pablogs@itelgua.com)
Address: 8a Avenida 11-49 Zona 1, Guatemala
- Reply and Date:** 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {S1}
07/15/2011: Second request. {S2}
07/27/2011: Third request. {S3}
- No response received.
- Company:** *Fabrica De Tejidos Samira*
Contact(s): Julio Farrach, General Manager (fax: 502-2236-1178)
Address: 21 Av. 9-47 Zona 11, Colonia Mirador 1, Guatemala, Guatemala
- Reply and Date:** 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {T1}
07/15/2011: Second request. {T2}
07/27/2011: Third request. {T3}
- No response received.
- Company:** *Fabrica La Roca*
Contact(s): Alejandro Arnau, General Manager (nrivera@flaroca.com)
Address: KM 7.5 Ruta al Atlántico Zona 18, Guatemala 01018 C.a., Guatemala
- Reply and Date:** 06/26/2011: Initial inquiry regarding company's ability to produce subject fabric. {U1}
07/05/2011: Company advised that it could not produce the subject fabric. {U2}
- Company:** *Frazima Concepción/Monte Textile*
Contact(s): Juan Carlos Castaneda, Sales Manager (juancarlos@textisur.com)
Address: KM 18.5 Carretera al Mayan Golf Club, Villa Nueva, Guatemala
- Reply and Date:** 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {V1}
07/15/2011: Second request. {V2}
07/27/2011: Third request. {V3}
- No response received.
- Company:** *FSTEX*
Contact(s): Hans W. Schieber V., Title Unknown (fax: 822-3779-5584)
Address: Km 19.5 Carretera a San Jose Pinula, Guatemala
- Reply and Date:** 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {W1}



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07/15/2011: Second request. {W2}

07/27/2011: Third request. {W3}

No response received.

Company: *Grupo Imperial*
Contact(s): Romeo Rodriguez, Manager (romeo.rodriquez@imperialtex.com)
Address: Calzada Roosevelt 34-21 Zona 11, Guatemala, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {X1}
07/15/2011: Second request. {X2}
07/27/2011: Third request. {X3}

No response received.

Company: *Hilos Y Telas*
Contact(s): Sue Ellen Hamm, Export Sales Manager
(Sue.hamm@hilosytelas.com)
Address: 34 Calle 7-42 Zona 11, Colonia Las Charcas, Guatemala, Guatemala

Reply and Date: 06/26/2011: Initial inquiry regarding company's ability to produce subject fabric. {Y1}
07/04/2011: Company advised that it could not produce the subject fabric {Y2}

Company: *Icitetex- Tejidoes Politex*
Contact(s): Guillermo Zaid, Title Unknown (ribbons@tejidospolitex.com)
Address: 12 Calle "A" 2-37 Zona 3, Colonia el Rosario, Mixco, Guatemala C.A., Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {Z1}
07/15/2011: Second request. {Z2}
07/27/2011: Third request. {Z3}

No response received.

Company: *Imperialtex*
Contact(s): Carla Robles, Contact (carla.robles@imperialtex.com)
Address: Calzada Roosevelt 34-21 zona 11, Guatamala

Reply and Date: 06/28/2011: Initial inquiry regarding company's ability to produce subject fabric. {BE1}
06/30/2011: Company requests sample of subject fabric. {BE2}
06/29/2011: Hansae provides color photographs of the subject fabrics and indicates that he will send original swatches



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once he received complete address and contact information. {BE3}

07/04/2011: Company indicates, after review of the photographs, that it cannot produce the subject fabric. {BE4}

No response received.

Company: *Industrias Liztex*
Contact(s): Saul Mishaan, Sales Manager (saul@liztex.com)
Address: KM. 30.5 Carretera Al Pacifico, Guatemala

Reply and Date: 06/26/2011: Initial inquiry regarding company's ability to produce subject fabric. {AA1}
06/27/2011 Company advised that it could not produce the subject fabric. {AA2}

Company: *J. H. Brostex*
Contact(s): Byung Taek Chung, Manager (fax: 502-7844-95431)
Address: 12 Calle 0-00 Zona 6, San Cristobal, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AB1}
07/15/2011: Second request. {AB2}
07/27/2011: Third request. {AB3}

No response received.

Company: *Jung Woo Textiles*
Contact(s): Ines Lee, Contact (Guatemala@jungwootextile.com); rnilove@hanmail.net)
Address: Km. 37.5 Carretera al Pacifico Palin Escuintla, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AC1}
07/15/2011: Second request. {AC2}
07/27/2011: Third request. {AC3}

No response received.

Company: *Megatextil's*
Contact(s): Fernando Hong, Contact (Megatextil2010@hotmail.com)
Address: 41 B Sur 52A-62 PISO 4, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AD1}
07/15/2011: Second request. {AD2}
07/27/2011: Third request. {AD3}



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No response received.

Company: *Modas Amor & Modas Ham Kil*
Contact(s): Chang Ok Yoo, Title Unknown (changoky@hanmail.net)
Address: Km. 35.8 Carretera al Pacifico Lotificacion los Sauces Palin
Escuintla, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AE1}
07/15/2011: Second request. {AE2}
07/27/2011: Third request. {AE3}

No response received.

Company: *Textiles Del Sur International, S.A.*
Contact(s): Juan Carlos Castaneda, Manager (juancarlos@textisur.com)
Address: KM. 18.5 Carretera Al Mayan Golf Club, Villa Nueva, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AF1}
07/15/2011: Second request. {AF2}
07/27/2011: Third request. {AF3}
07/30/2011: Company requested a sample of the subject fabric. {AF4}
07/31/2011: Hansae provided photographs of the subject fabric. {AF5}
08/02/2011: After review of the photographs provided, Company advised that it was unable to produce the subject fabric. {AF6}

Company: *Parktland*
Contact(s): Bryan Quan, General Manager (bquan@parktland.com)
Address: 17 Calle 5-36 Zona 1, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AG1}
07/15/2011: Second request. {AG2}
07/27/2011: Third request. {AG3}
07/28/2011: Company advised that it was unable to produce the subject fabric. {AG4}

Company: *Parracana*
Contact(s): Raul Ibarguen Pujol, Manager (502-7763-8033)
Address: 8a. Avenida 11-49 Zona 1, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce



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subject fabric. {AH1}
07/15/2011: Second request. {AH2}
07/27/2011: Third request. {AH3}

No response received.

Company: *Rosazu*
Contact(s): Francisco Goenz, General Manager (francisco.goenz@imerlet.com)
Luis Guzman, Finance Manager (luis.guzman@imerlet.com)
Address: Lote 55 Monte Maria, Guatemala City, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce
subject fabric. {AI1}
07/15/2011: Second request. {AI2}
07/15/2011: Company indicated that it cannot supply the subject
fabric. {AI3}

Company: *Supratextiles*
Contact(s): Raul Ibarquen Garcia-Salas, Contact (rigs@itelqua.com)
Address: 3a. Calle 7-53 A, Zona 2 San Jose, Villa Nueva, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce
subject fabric. {AJ1}
07/15/2011: Second request. {AJ2}
07/27/2011: Third request. {AJ3}

No response received.

Company: *Tejidos Corporativos*
Contact(s): Tony Malouf (ramalouf@tejidosccorporativos.com)
Address: Km. 18.5 Carretera al Club Mayan Golf, Villa Nueva, Guatemala

Reply and Date: 07/31/2011: Initial inquiry regarding company's ability to produce
subject fabric. {BF1}
08/02/2011: Company indicated that it cannot produce the subject
fabric. {BF2}

Company: *Tejidos Mundiales*
Contact(s): Stephan Meany (fax: 502-6631-3378)
Km 18 5 Carretera Mayan Golf Zona Villa Nueva, Guatemala

Address:
Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce
subject fabric. {AK1}
07/15/2011: Second request. {AK2}
07/27/2011: Third request. {AK3}

No response received.



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Company: *Textiles Perfecta*
Contact(s): Alberto Zimeri, Manager (textiles@textilesperfecta.com)
Address: 1 avenida 33-26 zona 12, Colonia El Carmen, Guatemala City, Guatemala

Reply and Date: 06/26/2011: Initial inquiry regarding company's ability to produce subject fabric. {AL1}
06/27/2011: Company requested a sample of the subject fabric. {AL2}
06/27/2011: Hansae provided photographs of the subject fabric so that Company could initially determine whether or not they could produce the fabric. {AL3}
06/28/2011: Company indicated that it thought it could produce the subject fabric based on the photographs. {AL4}
06/28/2011: Hansae agreed to provide a sample of the subject fabric to the company and requested the mailing address and contact information. {AL5}
06/29/2011: Company provided the mailing address and contact information. {AL6}
06/29/2011: Hansae sent the sample via UPS and provided a tracking number to Company. {AL7}
07/05/2011: Company, after reviewing the original swatch of the subject fabric, indicated that it was unable to produce the fabric. {AL8}

Company: *Textiles Capuano/ Textiles Catania*
Contact(s): Alejandro Ortega, Manager (aob@textilescapuano.com)
Address: La. Avenida 3-86, Zona 1 Boca del Monte, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AM1}
07/15/2011: Second request. {AM2}
07/27/2011: Third request. {AM3}

No response received.

Company: *Textiles Del Pacifico*
Contact(s): Rene Castaneda, General Manager (rcastaneda@texpasa.com / aguerra@texpasa.com)
Address: 13 Avenida 32-53 Zona 13, Colonia Santa Fe, Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AN1}
07/15/2011: Second request. {AN2}
07/27/2011: Third request. {AN3}

No response received.



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Company: *Textiles Modernos*
Contact(s): Ligia Maria Illescas, Manager (fax: 502-2476-7304)
Address: 18 calle 10-56, Zona 1 Guatemala

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AO1}
07/15/2011: Second request. {AO2}
07/27/2011: Third request. {AO3}

No response received.

Honduras:

Company: *AKH*
Contact(s): Tem McInville, General Manager (fax: 504-580-5509)
Address: Parque Industrial Green Valler, C Occidente, KM. 24m Quimistan, Santa Barbara, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AP1}
07/15/2011: Second request. {AP2}
07/27/2011: Third request. {AP3}

No response received.

Company: *Caracol Knits*
Contact(s): Denisse Castellano, General Manager (fax: 504-507-1201)
Address: Km. 45 Carr.Hacia Tryucigalpa, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AQ1}
07/15/2011: Second request. {AQ2}
07/27/2011: Third request. {AQ3}

No response received.

Company: *Cottonwise Textiles*
Contact(s): Chan Wun Kim, General Manager (cwkim@cottonwise.com)
Address: Zona Libre cotton Wise, 16 Calle 15 16 Av Bo Canas San Pedro Sula Honduras, Honduras

Reply and Date: 07/03/2011: Initial inquiry regarding company's ability to produce subject fabric. {AR1}
07/05/2011: Company advised that it could not produce the subject fabric. {AR2}



Company: *Elcatex*
Contact(s): Jesus Canahuati, General Manager (chuy@elcatex.com)
Keith Reynolds, Vice President of Sales
Address: Elasticos Centroamericanos Y Textiles Zona Libre Elcatex Choloma,
Cortes, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce
subject fabric. {AS1}
07/15/2011: Second request. {AS2}
07/27/2011: Third request. {AS3}

No response received.

Company: *Industrias Continental*
Contact(s): Roberto Diban Canahuati, Manager
(juancarlos@industriascontinental.com;
antonior@industriascontinental.com)
Address: Km 12, Carretera A Tegucigalpa, 300 Mts. Al Sur De Pronorsa,
Bufalo, Villanueva, San Pedro Sula, 2197, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce
subject fabric. {AT1}
07/15/2011: Second request. {AT2}
07/27/2011: Third request. {AT3}

No response received.

Company: *RLA Manufacturing*
Contact(s): Erik Rodriguez, General Manager (rodriguez Erik@russellcorp.com)
Philip Holloway, Contact (garciaedy@russellcorp.com)
Address: Zona Libre La Jutosa, Choloma, Cortes, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce
subject fabric. {AU1}
07/15/2011: Second request. {AU2}
07/27/2011: Third request. {AU3}

No response received.



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Company: ***Shin Sung Honduras***
Contact(s): Dong Bog Lee, General Manager (fax: 504-669-3131)
Address: ZIP San Miguel VI, Rio Nance, Chloma, Cortes, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AV1}
07/15/2011: Second request. {AV2}
07/27/2011: Third request. {AV3}

No response received.

Company: ***Sky Textile Honduras***
Contact(s): Ken Tai, Contact (ken_tai@oceanskyintl.com)
Address: ZIP Rio Blanco, San Pedro Sula, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AW1}
07/15/2011: Second request. {AW2}
07/16/2011: Company indicated that it cannot produce the subject fabric. {AW3}

Company: ***Woong Chun Honduras***
Contact(s): Jeon Seong-Hyun, Marketing Director (padrino@woongchun.com)
Address: Km. 19.5, Crrt. A Occidente, Naco Quimistan, Sta. Barbara, Honduras

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AX1}
07/15/2011: Second request. {AX2}
07/27/2011: Third request. {AX3}

No response received.

United States:

Company: ***Alamac American Knits***
Contact(s): Ron Giacone, VP Sales (ron.giacone@alamacusa.com)
Address: 1885 Alamac Road, Lumberton, NC 28358

Reply and Date: 06/26/2011: Initial inquiry regarding company's ability to produce subject fabric. {AY1}
06/27/2011: Company advised that it does not produce the subject fabric. {AY2}



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Company: *LJ Knit Sales*
Contact(s): Jay Steinberg, Contact (jaysteinbergmsv@comcast.com)
Address: 654 GRAYCLIFF LN, Ambler, Pennsylvania 19002

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {AZ1}
07/15/2011: Second request. {AZ2}
07/27/2011: Third request. {AZ3}

No response received.

Company: *Milliken & Co.*
Contact(s): Web Form
Address: Kathi Dutilh, Manager, Government Relations
(kdutilh@millikendc.com)
Reply and Date: Jack Spoon, Business Manager, Workwear Fabrics
(jspoon@milliken.com)
920 Milliken Road, Spartanburg, SC 29304

06/27/2011: Hansae inquired with Milliken via its online portal at:
<http://www.visaendurance.com/contactus/Pages/ContactUs.aspx>.
09/19/2011: STR contacted Milliken to determine whether it was able to produce the subject fabric. {BG1}
09/26/2011: Milliken indicated that it is not capable of producing the subject fabric. {BG2}

Company: *MJ Soffe*
Contact(s): Customer Service (customerservice@mjsoffe.com)
Address: 1 Soffe Dr., Fayetteville, NC 28301-5262

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {BA1}
07/15/2011: Second request. {BA2}
07/27/2011: Third request. {BA3}

No response received.

Company: *Volunteer Knit Apparel*
Contact(s): Nora Wolsenbarger, Office Manager (nora@volknit.com)
Address: 403 Old Knoxville Highway, New Tazellwell, TN 37825

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {BB1}
07/15/2011: Second request. {BB2}
07/27/2011: Third request. {BB3}



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No response received.

Company: *Clover Knits, Inc.*
Contact(s): Kevin McCarter, President (kevin@cloverknits.com)
Address: 1075 Jackson Heights, Clover, SC 29710-7659

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {BC1}
07/15/2011: Second request. {BC2}
07/27/2011: Third request. {BC3}

No response received.

Company: *Russ Knits, Inc.*
Contact(s): David Martin, Vice President (dmartin@russknits.com)
Address: 403 Old Knoxville Highway, New Tazellwell, TN 37825

Reply and Date: 06/27/2011: Initial inquiry regarding company's ability to produce subject fabric. {BD1}
07/15/2011: Second request. {BD2}
07/15/2011: Company indicated that it is unable to produce the subject fabric. {BD3}

(ii) Identification of CAFTA-DR suppliers

As part of its due diligence, Hansae directly contacted the trade associations representing the CAFTA-DR countries' textile industries. They also contacted numerous individual companies throughout the CAFTA-DR region that based upon inquiries and experience could conceivably produce the fabrics in question. To the best of its knowledge and ability, Hansae identified and contacted any regional supplier that might have the capability to produce the subject fabric. As the foregoing explains, these efforts to identify CAFTA-DR suppliers were reasonable in light of the product at issue.

(iii) Use of Third Parties and Business-to-Business Contact

All communications were handled directly between Hansae and the individual companies and associations. Further, all contacts were made at the level appropriate to communicate information on the fabrics needed, the specifications and standards, and the reason for those standards. Hansae was represented at the highest level of the company.

(iv) Description of the Subject Product

The Annex was provided to all potential suppliers and represents reasonable product specifications, including fiber content, yarn size and finishing processes expressed in accepted terminology and standards. The Annex describes with specificity the fabric needed by Hansae.



(v) *Provision of Samples*

As noted above, in the course of the business dialogue, Hansae provided pictures and physical samples to several potential suppliers. None provided a counter sample or indicated that they could produce the requested fabric.

(vi) *Substitutability of Products*

No companies suggested any fabrics that were substitutable for the subject fabric.

(4) Substitutable Products

It is absolutely critical that the fabric in question meet the stated performance criteria. A fabric that cannot match the stated requirements is simply unusable to Hansae and its customer and therefore is not substitutable.

Hansae is unaware of any supplier that produces a substitutable product in the CAFTA-DR countries, and did not receive an assertion that a conforming fabric could be produced that was substitutable for the fabrics requested.

Thank you for your consideration of this request. If you have any questions or require further information, please contact me at 202-216-9307 or mtallo@strtrade.com.

Respectfully submitted,
SANDLER, TRAVIS & ROSENBERG, P.A.

By: 
Mark Tallo, Esq.

ANNEX

<u>Detailed Product Description</u>	
FABRIC TYPE	Raschel Lace Knit Open Work Crepe
FIBER CONTENT	18-20% Cotton, 76-80% Nylon, 2-4% Spandex
YARN SIZE	Cotton English 57 to 62/2 ((95 to 104/2 dtex) (96 to 107/2 metric count))
	Nylon English 48 to 52 denier/48 filament ((53 to 58 dtex/48 filament) (173 to 187.5 metric count/48 filament))
	Gimped yarn, Spandex core English 199.5 to 220.5 denier (221.6 to 245 dtex) (metric 40.85 to 45.15) wrapped in Nylon English 66 to 74 denier/24 filament/2 ((73 to 83 dtex/24 filament/2) (121.6 to 136.3 metric count/24 filament/2))
MACHINE GAUGE	18 GG
NUMBER OF BARS	42
FABRIC WEIGHT	110 to 140GR per square meter
FABRIC WIDTH	127 to 152 centimeters
FINISHING PROCESS	(Piece) dyed or printed
QUANTITY required	[*****] square meters each calendar year on the following schedule: [*****] square meters by June 1; [*****] square meters by July 1; [*****] square meters by August 1; [*****] square meters by September 1; [*****] square meters by October 1; [*****] square meters by November 1 and [*****] square meters by December 1
HTSUS subheading	6005.32.00 (solid); 6005.34.00 (print)
REMARKS	Normal soft finish (= Heat Set)

ATTACHMENT

(CONFIDENTIAL VERSION ONLY)

Confidential version contains copies of Hansae's confidential request letters and confidential responses, as described in the foregoing letter.