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COMMERCIAL AVAILABILITY REQUEST

- - PUBLIC VERSION - -

November 28, 2011

Ms. Kim Glas
Chair, Committee for the Implementation of Textile Agreements
Office of Textiles and Apparel
U.S. Department of Commerce
14th and Constitution Ave., NW
Washington, DC 20230

Re: Commercial Availability Request Under Section 203(o)(4) of the Dominican Republic-Central America-United States Free Trade Agreement Implementation Act

Dear Ms. Glas,

On behalf of Hansoll Textile, Ltd. (“Hansoll”), and pursuant to Section 203(o)(4) of the Dominican Republic-Central America-United States Free Trade Agreement (“CAFTA-DR”) Implementation Act and the Final Procedures set forth in 73 Fed. Reg. 53200 (September 15, 2008), Sorini, Samet & Associates, LLC (“SS&A”) requests that the fabric described herein (“subject fabric”) be added to the list in Annex 3.25 of CAFTA-DR in an unrestricted quantity.

I. Detailed Product Description

Detailed product specifications are listed in metric measurements below. During due diligence inquires, potential suppliers were provided with the same specifications converted into English measurements, which can be found in Appendix I to this Request.

<p>Fabric Description:</p>

<p>Circular knit Three End Fleece 100% polyester – Heather color</p>

All values listed in metric measurements		Low parameter	High parameter	
Fiber content	Polyester	100%	100%	
Yarn size	Face yarn (100% polyester – 50% cationic/ 50% disperse)	Denier (cation/disperse)	70	80
		Filament	132	132
	Tie yarn (100% polyester)	Denier	68	80
		Filament	72	72
	Fleece yarn (100% polyester)	Denier	140	160
		Filament	144	144
Weight (grams per square meter)		225	265	
Width (centimeters)		140	170	
Quantity (square meters per month)		[***]	[***]	
Machine gauge		28		
Coloration		Piece dye by cation dyestuff, with brushing		
HTSUS		6001.92.0000		
Performance criteria	<ol style="list-style-type: none"> 1. Durable water repellent (C6), AATCC test method 22 - Spray Test, 80% Coverage/20 Washes 2. Fleece side: Brushed, Sheared, Tumbled - ASTM D6797 => 100 PSI 3. Course per Centimeter: 18.9 - 19.7. This indicates # of loops in one centimeter width direction. 4. Wales per Centimeter: 15.7 – 16.5. This indicates # of loops in one centimeter longitudinal direction. 5. Spirality: 3 times wash (AATCC test method 179) = <5% 6. Pilling: ASTM D-3512 = 4 7. Snagging Length & Width: 300 cycles = 3 ASTM D3939 8. Air Permeability: ASTM D737 = 110 ~120 (initial) CFM 9. CIO value (thermal transmittance) = 0.45 ~ 0.60 U2/CIO (ASTM D1518) 10. AATCC test method 135 - test for shrinkage. Length & width would be measured for shrinkage/spreading – not to exceed +/-5% 			

	11. No colorfastness values under 2.5 (AATCC test method 8 – colorfastness to crocking)
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II. Quantity

[***] to [***] square meters per month.

III. Due Diligence

SS&A made the initial inquiries to potential suppliers of the subject fabric in the CAFTA-DR region. When a potential supplier expressed interest in supplying the subject fabric, Hansoll continued the dialogue directly on a business-to-business basis. The due diligence efforts did not result in identifying any parties in the CAFTA-DR region that were able to supply the subject fabric.

One company, Textiles Del Sur Internacional, S.A. (“Textisur”), engaged Hansoll in serious dialogue regarding the ability to supply the subject fabric. Textisur had not produced the subject fabric in the past, and an attempt to develop the fabric was unsuccessful.

The list of potential suppliers was compiled through (1) SS&A’s and Hansoll’s experience in three prior commercial availability petitions addressing knit fabrics, (2) through the 2011 Davison’s Textile Salesman’s Blue Book, and (3) through the contact mechanisms of U.S. and Central American textile and apparel trade associations.

A full account of correspondence is included in Appendix III to this document.

U.S. ASSOCIATIONS

Association: **American Manufacturing Trade Action Coalition, AMTAC**

Contact: Sara Beatty, Director of International Trade:
sbeatty@amtacdc.org
Address: 910 16th St. NW, Washington, DC 20006
Date Contacted: September 30, 2011
Nature of request: Inquiry to members’ ability to supply subject fabric, and request for potential suppliers’ contact information.
Sample Provided: No
Reply and Date: September 30, 2011: Association will circulate to the membership on Monday, Oct. 3.

Association: **National Council of Textile Organizations, NCTO**

Contact: Mike Hubbard, Vice President: mhubbard@ncto.org
Address: P.O. Box 99 – Gastonia, NC 28053
Date Contacted: September 30, 2011

Nature of Request: Inquiry to members' ability to supply subject fabric, and request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: September 30, 2011: NCTO responded that it would distribute to membership.

Association: National Textile Association, NTA

Contact: David Trumbull, Director – Members Services
dtrumbull@nationaltextile.org
Address: 6 Beacon Street, Suite 1125, Boston, MA 02108
Date Contacted: September 30, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: September 30, 2011: NTA responded that it would distribute to membership.

DR/CENTRAL AMERICA ASSOCIATIONS

Association: Honduran Manufacturers Association

Address: Edificio Yde Canahuati 3er y 4to Piso, Avenida Circunvalacion, S.O., San Pedro Sula, Cortes, Honduras, C.A.
Contact: Astrid Barnica, Client Services:
servicioalcliente@ahm-honduras.com
Date Contacted: September 30, 2011
Nature of Request: Inquiry into members' ability to supply subject fabric, and request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: No response from association.

Association: Nicaraguan Textile & Apparel Manufacturers Association (ANITEC)

Address: Zona Franca "Las Mercedes" km 12 ½ Carretera Notre Managua Nicaragua
Contact: Dean Garcia Foster, Executive Director: director@anitec.net
Date Contacted: September 30, 2011
Nature of Request: Inquiry into members' ability to supply subject fabric, and request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: No response from association.

Association: Camara de la Industria Textil y de la Confeccion de El Salvador (CAMTEX)

Address: Calle Liverpool y Calle Roma, edif. ASI. Col. Roma San Salvador, El Salvador

Contact: Patricia Figueroa, Managing Director:
direccion@camtex.com.sv
Date Contacted: September 30, 2011
Nature of Request: Inquiry into members' ability to supply subject fabric, and
request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: No response from association.

Association: Costa Rican Chamber of Textiles

Contact: Annia Secura, Director: asegura@textilescr.com
Address: Apartado 1512 1002 Pase de Estudiantes San Jose, Costa Rica
Date Contacted: September 30, 2011
Nature of Request: Inquiry into members' ability to supply subject fabric, and
request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: No response from association.

Association: Asociación Dominicana de Zonas Francas, ADOZONA

Contact: Jose Torres, Executive Director, adozona@codetel.net.do
Address: AV. Sarasota #20, 4to. Piso, Torre Empresarial AIRD,
Apartado Postal 3184 Santo Domingo, R.D.
Date Contacted: September 30, 2011
Nature of Request: Inquiry into members' ability to supply subject fabric, and
request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: No response from association.

Association: Asociación de la Industria de la Vestuario y Textiles, VESTEX

Contact: Luis Oscar Estrada, Manager: lestrada@apparel.com.gt
Address: 15 Avenida 14-72 zona 13 2ndo. Nivel Guatemala, Guatemala
C. A 01013
Date Contacted: September 30, 2011
Nature of Request: Inquiry into members' ability to supply subject fabric, and
request for potential suppliers' contact information.
Sample Provided: No
Reply and Date: No response from association.

UNITED STATES

Company: Elastic Corporation of America (Premier Narrow Fabrics)

Contact: Harry Cohen, Sales Contact: hcohen@premiernf.com
Address: 455 Hwy. 70, Columbiana, AL 35051
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.

Sample Provided: No
Follow-up: October 7, 2011
Follow-up: October 20, 2011
Reply and Date: No reply from company.

Company: Polartec

Contact: Jim Zeiba, Sales Contact: zeibaj@polartec.com
Address: 46 Stafford Street, Lawrence, Massachusetts 01841
Date Contacted: October 26, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: October 27, 2011: Polartec replied that they do not produce three-end fleece.

Company: Swisstex

Contact: Keith Dartley, President: keith@swisstexdirect.com
Website contact: info@swisstex-ca.com
Address: 13660 S. Figueroa St. Los Angeles, CA 90061
Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: October 26, 2011: Swisstex replied that they are evaluating the fabric specs and would respond soon.
Reply and Date: October 26, 2011: Swisstex replied that they cannot produce the fabric.

EL SALVADOR

Company: Exportadora Textufil S.A. de C.V.

Contact: Hector Rico, Sales Contact: hector@textufil.com
Elias Jorge Bahaias, General Manager: info@textufil.com
Address: Blvd Del Ejercito Nacional y 12 Av Sur, Soyapango
San Salvador, El Salvador, C.A.
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Follow-up: October 20, 2011
Reply and Date: No reply from company.

Company: I.C.A.T., S.A. de C.V

Contact: Elsa Leticia Rivera, General Manager:
icatsa@navegante.com.sv
Address: Zona Industrial Plan de La Laguna, Poligono G, lote 2, El Salvador

Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Follow-up: October 20, 2011
Reply and Date: No reply from company.

Company: Industrias St. Jacks, S.A. de C.V.

Contact: Sergio Siman, Sales Contact: ssiman@stjacks.com
Address: Zona Industrial La Laguna Antiguo Cuscatlan, Aptdo 2609
La Libertad, El Salvador
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Reply and Date: October 10, 2011: Given the fiber content, St. Jacks referred Nemtex, Swistex, Textufil, and Pettenati.

Company: Nemtex, S.A. de C.V.

Contact: Francisco Miguel, Sales Contact: f.m.reinhardt@nemtex.com
Address: Calle Antigua A San Antonio Abad, San Salvador, El Salvador
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Reply and Date: October 7, 2011: Company cannot supply the fabric.

Company: Ocean Sky Int.

Contact: Ken Tai, Sales Contact: ken_tai@oceanskyintl.com
Address: Zona Franca Internacional, Edificio No. 2, KM 28.5,
Carretera a Comalapa, Olocuilta, La Paz, El Salvador
Nature of Request: Inquiry to ability to supply subject fabric.
Date Contacted: September 30, 2011
Sample Provided: No
Follow-up: October 7, 2011
Reply and Date: October 7, 2011: Company does not make the subject fabric.

Company: Pettenati Centro America S.A. de C.V.

Contact: Claudia Villacorta, Customer Service Coordinator Commercial
Department: cvillacorta@pettenati.com.sv
Address: KM 42 Carretera a Santa Ana Coatepeque, Aanta Ana, El
Salvador
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No

Reply and Date: October 4, 2011: Pettenati claims to be able to supply the subject fabric.

Reply and Date: October 19, 2011: Hansoll requests specific information regarding Pettenati's experience producing the subject fabric or experience producing other circulate knit three-end fleece fabric, and also requested information regarding Pettenati's equipment and proposed development process for the fabric if they had not before produced the fabric. Hansoll also sent pictures of the back and front face of each fabric (see Appendix II).

Follow-up: October 25, 2011: Hansoll followed up on its previous email.

Follow-up: November 15, 2011

Follow-up: November 18, 2011

Reply and Date: No response from company.

Company: Rayones de El Salvador, S.A. de C.V.

Contact: Oscar Safie, Sales Contact:
oscar-safie@rayones-hilaexport.com.sv

Address: Km. 11 Carr Panamericana, Ilopango, San Salvador, El Salvador

Date Contacted: September 30, 2011

Nature of Request: Inquiry to ability to supply subject fabric.

Sample Provided: No

Follow-up: October 7, 2011

Follow-up: October 20, 2011

Reply and Date: October 20, 2011: Rayones responded that they only make two-end fleece.

GUATEMALA

Company: Fabrica La Roca

Contact: Website contact form: <http://www.flaroca.com/inicio.cfm>
Jorge Alejandro Arnau, Sales Contact: arnaujorge@gmail.com

Address: KM 7.5 Ruta al Atlántico Zona 18, Guatemala 01018 C.a., Guatemala

Date Contacted: September 30, 2011

Nature of Request: Inquiry to ability to supply subject fabric.

Sample Provided: No

Follow-up: October 20, 2011

Reply and Date: October 20, 2011: Fabrica la Roca replied that they do not have the machinery to make the fabric.

Company: Hilos Y Telas

Contact: Christian Signoret, CEO: csignoret@hilosytelas.com
Faxed inquiry to company: (305) 438-1928 (Miami)

Address: 34 Calle 7-42 Zona 11, Colonia Las Charcas, Guatemala, Guatemala
2125 Biscayne Blvd., Suite 100 Miami, FL 33137
Date Contacted: September 30, 2011(fax)
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 20, 2011 (email)
Reply and Date: October 21, 2011: Hilo y Telas replied that they cannot supply three-end fleece.

Company: Imperialtex

Contact: Carla Robles, Sales Contact: carla.robles@imperialtex.com
Address: Calzada Roosevelth 34-21 zona 11, Guatamala
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: Yes
Reply and Date: September 30, 2011: Imperialtex sent fabric specifications to the production plant. Production plant confirms ability to produce three-end fleece fabric. Plant would like to analyze samples of the subject fabric.
Reply and Date: October 4, 2011: SS&A provides Imperialtex photographs of the back and front face of the subject fabric, and SS&A offers to send physical samples if photographs are not sufficient for analysis.
Reply and Date: October 4, 2011: Imperialtex says it will notify SS&A if physical samples will be necessary.
Follow-up: October 19, 2011: Follow up regarding status of analysis.
Reply and Date: October 19, 2011: Imperialtex requests physical samples. SS&A sends physical samples to Imperialtex.
Follow-up: October 26, 2011: UPS confirms delivery of samples to Imperialtex. SS&A follows up with Imperialtex to ask for analysis of samples.
Follow-up: November 14, 2011
Follow-up: November 17, 2011
Reply and Date: No response from company.

Company: Industrias Liztex

Contact: Saul Mishaan, Sales Contact: saul@liztex.com
Address: Parques del Lago Km 30.5, Ruta al Pacifico Amatitlan, Guatemala
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Reply and Date: October 7, 2011: Company can only do two-end fleece.

Company: Parktland

Contact: Bryan Quan, General Manager: bquan@parktland.com
Address: 17 Calle 5-36 Zona 1, Guatemala
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: September 30, 2011: Cannot supply the fabric.

Company: Tejidos Corporativos

Contact: Tony Malouf, Sales Contact:
ramalouf@tejidoscorporativos.com
Address: Km. 18.5 Carretera al Club Mayan Golf, Villa Nueva,
Guatemala
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Follow-up: October 20, 2011
Reply and Date: No reply from company.

Company: Textiles Del Sur International, S.A./Monte Textil

Contact: Juan Carlos Castaneda, Manager: juancarlos@textisur.com
Address: KM. 18.5 Carretera Al Mayan Golf Club, Villa Nueva,
Guatemala
Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: Yes
Follow-up: October 7, 2011
Reply and Date: October 7, 2011: Textisur claims to be able to supply the
subject fabric.
Meeting Date: October 11, 2011: Hansoll meets with Textisur in Guatemala,
where among other business Hansoll inquires about Textisur's
capability to supply the subject fabric. Textisur reaffirms claim
to be able to supply subject fabric working with a contract
knitting mill, [[[***]]]. Textisur says sample development will
take three weeks.
Reply and Date: October 19, 2011: Hansoll asks that Textisur proceed with
development of samples. Also, Hansoll requests specific
information regarding Textisur's experience producing circular
knit three-end fleece fabric of 100% polyester, and asks for
information regarding Textisur's equipment and proposed
development process for the fabric, including contractors.

Reply and Date: October 19, 2011: Textisur says it was only pursuing development of a different 100% polyester three-end fleece, and does not have a sample of the subject fabric.

Reply and Date: November 15, 2011: Hansoll asked whether Textisur was still interested in supplying the subject fabric.

Reply and Date: November 16, 2011: Textisur replied that they are only working on a separate three-end fleece fabric.

Reply and Date: November 18, 2011: Hansoll asked for confirmation that Textisur will not pursue the subject fabric.

Reply and Date: November 19, 2011: Textisur replied that they are waiting for results of another three-end fleece fabric sample in order to do the subject fabric sample.

Reply and Date: November 23, 2011: Hansoll asks whether Textisur can supply the fabric.

Reply and Date: November 26, 2011: Textisur replies that they cannot supply the fabric.

Company: **Textiles Perfecta**

Contact: Alberto Zimeri, Manager: textiles@textilesperfecta.com
Address: 1 avenida 33-26 zona 12, Colonia El Carmen, Guatemala City, Guatemala

Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: September 30, 2011: Cannot supply the fabric.

HONDURAS

Company: **Caracol Knits**

Contact: Denisse Castellanos, General Manager:
dcastellanos@caracolknits.com

Address: Zona Libre El Caracol, Km 200 carretera a Tegucigalpa, Honduras

Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Follow-up: October 20, 2011
Reply and Date: No reply from company.

Company: **Elcatex**

Contact: Karla Pineda, Product Development Manager:
karla.pineda@elcatex.com

Address: Elasticos Centroamericanos Y Textiles Zona Libre Elcatex Choloma, Cortes, Honduras

Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: October 6, 2011: Company does not work three end fleece.

Company: Roman Knit Honduras, S.A. (RKH)

Contact: Wilfredo Modenessy: wmodenessy@rkhsa.com
Guillermo Gutierrez, Sales Contact: ggutierrez@rkhsa.com
Address: Green Valley Industrial Park, Lote 7B, Km. 23, Quimistan
Santa Barbara, Honduras

Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Follow-up: October 20, 2011
Reply and Date: No reply from company.

Company: Woong Chun Honduras, S.A.

Contact: Luis Ryu, Sales Contact: Honduras@woongchun.com
Brian Kwon, Sales Contact: briankwon@woongchun.com
Address: Km. 19.5, Carretera al Occidente, Naco Santa Barbara,
Honduras

Date Contacted: September 30, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 7, 2011
Follow-up: October 20, 2011
Reply and Date: No reply from company.

As a result of these inquiries, SS&A and Hansoll do not believe that the subject fabric is available in the region and we request that it be added to Annex 3.25.

IV. Substitutable Products

The subject fabric has a look and feel that Hansoll has contracted to meet the order requirements of its customers. The particular look and feel is achieved through the particular fabric specifications described. Fabrics of other fibers, yarn types, and that do not meet the performance criteria, cannot substitute the requested fabric.

SS&A and Hansoll are neither aware of any supplier in the CAFTA-DR region that produces a substitutable fabric, nor did any potential suppliers offer to supply a substitutable fabric during the due diligence process.

V. Closing

If you have any questions or require further information with regard to this request, please contact Keith Jenkins at (202) 393-4481 x201, or kjenkins@ssa-dc.com.

Sincerely,



Keith A. Jenkins
Senior Director

November 28, 2011

Date

APPENDIX I

[***]

Fabric Description:				
Circular Knit Three End Fleece, 100% Polyester – Heather Color				
All values listed in English measurements			Low parameter	High parameter
Fiber content	Polyester		100%	100%
Yarn size	Face yarn (100% polyester – 50% cationic/ 50% disperse)	Denier (cation/disperse)	112.5	128.6
		Filament	132	132
	Tie yarn (100% polyester)	Denier	112.5	132.4
		Filament	72	72
	Fleece yarn (100% polyester)	Denier	56.3	64.3
		Filament	144	144
Weight (ounces per square yard)			6.6	7.8
Width (inches)			55	67
Quantity (yards per month)			[***]	[***]
Machine gauge			28	
Coloration			Piece dye by cation dyestuff, with brushing	
Performance criteria	<ol style="list-style-type: none"> 1. Durable water repellent (C6), AATCC 22 Spray Test, 80% Coverage/20 Washes 2. Fleece side: Brushed, Sheared, Tumbled - ASTM D6797 => 100 PSI 3. CPI: 48 ~ 50 4. WPI: 40 ~ 42 (include range) 5. Spirality: 3 times wash (AATCC-179) = <5% 6. Pilling: ASTM D-3512 = 4 7. Snagging Length & Width: 300 cycles = 3 ASTM 			

D3939

8. Air Permeability: ASTM D737 = 110 ~120 (initial)
CFM
9. CIO value (thermal transmittance) = 0.45 ~ 0.60
U2/CIO (ASTM D1518)
10. AATCC-135 L & W = +/-5%
11. No colorfastness values under 2.5

APPENDIX II

[***]

[***]

APPENDIX III
