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August 7, 2009

**PUBLIC VERSION**

Chairman  
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/Polyester  
Fleece Fabrics (#1)**

Dear Chairman:

On behalf of Intradeco Apparel, Inc. of Miami, FL, 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 DR-CAFTA country. By means of this letter, we request that CITA place the subject product described in the Annex on the list in Annex 3.25 of the Agreement 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/polyester 21 gauge three-thread fleece classifiable under HTSUS subheading 6001.21.

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.

We note that the subject fabric is similar to an existing item contained in Annex 3.25, namely File Number 19. 2007.03.16.Fabric.ST&RforIntradeco. The differences between the existing specifications and those in the subject fabric relate to additional tolerances for fiber content and yarn denier, as well as a correction to the conversions provided for the fleece yarn.

These standards and specifications were explained to all potential suppliers.

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

**(2) Quantity**

Intradeco requires 2,721,600 kilograms (6,000,000 pounds) each season – April – August of each calendar year.

**(3) Due Diligence**

*(i) Generally*

The following is a summary of Intradeco's contacts and due diligence that demonstrates its legitimate intent, and good faith and reasonable efforts to obtain the subject fabrics from DR-CAFTA 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 based on the best information available. *See note 2, infra.*

Intradeco directly contacted all potential suppliers to locate sources for the subject fabrics, as well as the industry associations in all DR-CAFTA countries. Six firms expressed some generalized interest in producing the fabric. After nearly two months of communications with these firms Intradeco has not received any reliable information which would lead one to conclude that any of these companies are capable or willing to produce the subject fabric. One company, Parktland, admitted after some time that it could only finish the fabrics and did not have facilities to actually knit the fabric. Another, Elcatex, advised that it was not interested in pursuing the opportunity. Three others, Pettanatti, Hilos & Telas, and Clover, simply stopped communicating. Finally, Woong Chung provided a variety of contradicting information regarding its ability to meet the fabric specifications, refused to provide any supporting information regarding its claims to produce the subject fabric and was unclear for much of the dialogue as to the actual fiber content of the fabric.

Notwithstanding the apparent lack of interest and inability of these companies to produce the subject fabric, the stated capacity in the region, at most, is a mere fraction of Intradeco's requirements. Specifically, there are three companies (Hilos & Telas, Clover and Woong Chung) that allege the ability to produce the subject fabric and initially expressed a willingness to participate in the program. The total capacity for fleece fabric for these three companies is [\*\*\*\*\*] kilograms, or less than [\*\*] percent of the quantity that Intradeco requires.

Company	Total Capacity		Percent of Requirement
	Weekly	Five Months	
	(kgs)	(kgs)	
Hilos & Telas	[*****]	*****	****]
Woong Chun	[*****]	*****	****]
Clover <sup>1</sup>	[*****]	*****	****]
Total	[*****]	*****	****]

Intradeco has significant reservations regarding these companies' ability to produce the fabric as required in the stated quantities. Intradeco strongly believes the actual capacity for the subject fabric in the DR-CAFTA region is significantly less, if not zero. At this level of production in relation to required needs, the fabrics cannot be deemed to be available in commercial quantities as required under the Procedures.

Even if Intradeco were to utilize all of the claimed production capacity for these three companies it would be required to use at least one other non-regional company to supply its needs. This would present numerous quality, technical and logistical challenges which would effectively make the operation unworkable from a commercial perspective. The most notable and recognizable challenge that would necessarily result from the use of four or more facilities is an unacceptable level of variances in color, hand, feel, etc., making the overall product offering unacceptable to Intradeco's ultimate customers.

Details of the salient points of Intradeco's communications with the various companies and trade associations in the region are described below.<sup>2</sup>

## 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:** 6/8/09: Initial inquiry regarding members' ability to produce subject fabric. {A1}  
6/17/09: Second request. {A2}  
No responses received.

<sup>1</sup> Estimate based on representations that Clover has only one machine that could produce subject fabric. See Attachment AV8. We note that Clover indicates that it has [\*\*\*\*\*], but fails to provide any indication as to whether any or all of these machines could produce the subject fabric. See Attachment AV4a. We, therefore, are providing the best estimate available.

<sup>2</sup> Titles of the individuals contacted are listed in all cases where they are known. Contact information for many of the companies was provided by the relevant industry association. However, none of the associations provided titles with that contact information. Intradeco contacted the individuals recommended by the applicable associations and/or the contact person with whom they typically correspond with for business purposes.

**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 16<sup>th</sup> Street, N.W., Suite 760  
Washington, D.C. 20006  
**Reply and Date:** 6/8/09: Initial inquiry regarding members' ability to produce subject fabric. {B1, B2}  
6/8/09: Association advised it would forward inquiry to its members. {B3}

**Association:** Costa Rican Chamber of Textiles  
**Contact(s):** Maria Quirce, Director (maqcateco@racsa.co.cr)  
**Address:** Apartado 1512 1002 Pase de Estudiantes  
San Jose, Costa Rica  
**Reply and Date:** 6/8/09: Initial inquiry regarding members' ability to produce subject fabric. {C1}  
6/17/09: Second request. {C2}  
No responses received.

**Association:** Guatemala Apparel and Textile Association (VESTEX)  
**Contact(s):** Carla Caballeros, Executive Director (ccaballeros@apparel.com.gt)  
**Address:** 15 Avenida 14-72 zona 13 2ndo. Nivel  
Guatemala, Guatemala C. A 01013  
**Reply and Date:** 6/8/09: Initial inquiry regarding members' ability to produce subject fabric. {D1}  
6/17/09: Second request. {D2}  
No responses received.

**Association:** Honduran Manufacturers Association  
**Contact(s):** Ernesto Interiano Executive Director (directorejecutivo@ahm-honduras.com)  
Angela Castillo (direcciontecnica@ahm-honduras.com;  
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:** 6/10/09: Initial inquiry regarding members' ability to produce subject fabric. {E1}  
6/10/09: Association broadcast the inquiry to all of its members. {E2}

**Association:** National Council of Textile Organizations  
**Contact(s):** Michael Hubbard, Vice President (mhubbard@ncto.org)  
**Address:** 910 17<sup>th</sup> Street, NW, Suite 1020  
Washington, D.C. 20006  
**Reply and Date:** 6/8/09: Initial inquiry regarding members' ability to produce subject fabric. {F1}  
6/12/09: Association advised it would forward inquiry to all members. {F2}

**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:** 6/8/09: Initial inquiry regarding members' ability to produce subject fabric. {G1}  
6/8/09: Association advised it had circulated the inquiry with a request to respond by June 22. {G2}

**Association:** Nicaraguan Textile Association (Anitec)  
**Contact(s):** Dean Garcia, Executive Director (nicaind@aol.com; director@anitec.net)  
**Address:** Zona Franca "Las Mercedes" km 12 ½ Carretera Norte, Building #29  
Managua, Nicaragua  
**Reply and Date:** 6/17/09: Initial inquiry regarding members' ability to produce subject fabric. {H1}  
6/24/09: Second request. {H2}  
No responses received.

**Association:** Union de Industrias Textiles (UNITEX)  
**Contact(s):** Edwin Zamora, President (Unitex\_gg@telesal.net)  
Ingrid Burgos, Executive Director (Unitex\_gg@telesal.net)  
**Address:** Calle Liverpool y Roma, edificio ASI  
San Salvador, El Salvador  
**Reply and Date:** 6/8/09: Initial inquiry regarding members' ability to produce subject fabric. {I1, I2}  
6/17/09: Second request. {I3}  
No responses received.

## COMPANIES:

### El Salvador:

**Company:** Pettenati Centro America S.A. de C.V.  
**Contact(s):** Jose Denys, Commercial Department (jdenys@pettenati.com.sv)  
**Address:** KM 42 Carretera a Santa Ana  
Coatepeque, santa ana  
El Salvador  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {J1}  
6/12/09: Company advised it would take approximately one month to develop a sample. {J2}  
7/10/09: Intradeco requested follow up/status. {J3}  
7/17/09: Intradeco requested follow up/status. {J4}  
No further communications received.

### Guatemala:

**Company:** AMERICA TEXTILE  
**Contact(s):** Christian You, Title Unknown (cristian-you@yahoo.co.kr)  
**Address:** Physical Address Unknown  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {K1}  
6/19/09: Second inquiry. {K2}  
No responses received.

**Company:** Broadcloth  
**Contact(s):** Contact Name and Title Unknown (textil@guate.net)  
**Address:** Parques del Lago  
KM 305 Carretera al Pacifico amatitlán  
Guatemala C.A, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {L1}  
6/19/09: Second inquiry. {L2}  
No responses received.

**Company:** Empresa Industrial Cantel  
**Contact(s):** Pablo Garcia Salas, Title Unknown ([pablogs@itelgua.com](mailto:pablogs@itelgua.com))  
**Address:** Physical Address Unknown  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {M1}  
6/10/09: Company advised it could not make subject fabric. {M2}

**Company:** Fabrica De Tejidos Samira/ Confecciones Anice (Conamsa)  
**Contact(s):** Munir Massis, General Manager ([tejisamira@turbonett.com](mailto:tejisamira@turbonett.com))  
**Address:** 21 Av. 9-47 Zona 11, Colonia Mirador 1  
Guatemala, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {N1}  
6/19/09: Second inquiry. {N2}  
No responses received.

**Company:** Fabrica La Roca  
**Contact(s):** Alejandro Arnau, General Manager ([nrivera@flaroca.com](mailto:nrivera@flaroca.com))  
**Address:** KM 7.5 Ruta al Atlántico Zona 18  
Guatemala 01018 C.a., Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {O1}  
6/19/09: Second inquiry. {O2}  
No responses received.

**Company:** Frazima Concepción/Monte Textile  
**Contact(s):** Juan Carlos Castaneda, Export Manager ([juancarlos@textisur.com](mailto:juancarlos@textisur.com))  
**Address:** KM 18.5 Carretera al Mayan Golf Club  
Villa Nueva, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {P1}  
6/19/09: Second inquiry. {P2}  
No responses received.

**Company:** FSTEX  
**Contact(s):** Hans W. Schieber V., Title Unknown ([hwsvl@yahoo.com](mailto:hwsvl@yahoo.com))  
**Address:** Physical Address Unknown  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {Q1}  
6/19/09: Second inquiry. {Q2}  
No responses received.

**Company:** Grupo Imperial  
**Contact(s):** Roberto Zaid, President ([textiles@imperialtex.com](mailto:textiles@imperialtex.com))  
**Address:** Calzada Roosevelt 34-21 Zona 11  
Guatemala, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {R1}  
6/10/09: Company advised that it cannot produce subject fabrics. {R2}

**Company:** Hilos Y Telas  
**Contact(s):** Antonio Malouf, Sales Manager ([ramalouf@hilosytelas.com](mailto:ramalouf@hilosytelas.com))  
**Address:** 34 Calle 7-42 Zona 11  
Colonia Las Charcas  
Guatemala, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {S1}  
6/19/09: Company advised prices; Intradeco requested information on capacity.  
{S2}  
6/25/09: Intradeco requested prices for two fabrics separately; repeated request for additional information on company's capabilities and capacities, and offered to

send a sample. {S3}  
6/26/09: Company advised that it did not have sufficient capacity for “the time being”. {S4}  
6/29/09: Company advised its capacity was [\*\*\*\*\*], or less than [\*\*\*\*\*] of requirements. {S5}  
6/30/09: Company requested sample. {S6}  
6/30/09: Intradeco requested mailing address and clarification regarding apparent lack of available capacity. {S7}  
6/30/09: Company suggested opportunities could be explored. Fabrics sent to company. {S8}  
7/9/09: Requested follow up. {S9}  
7/9/09: Company advised it was making analysis and could make in quantities previously stated. {S10}  
7/10/09: Requested clarification on statements regarding capacity. {S11}  
7/16/09: Requested follow up. {S12}  
7/16/09: Company advised it was pricing and sampling and would have response by week’s end. {S13}  
7/20/09: Requested follow up. {S14}  
7/23/09: Again requested additional information on company’s capacity and ability to make subject fabric. {S15}  
No further responses received.

**Company:** Icitex– 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:** 6/8/09: Initial inquiry regarding company’s ability to produce subject fabric. {T1}  
6/19/09: Second inquiry. {T2}  
6/19/09: Company advised that it could not produce subject fabric. {T3}

**Company:** Industria Textile (INDUTEX)  
**Contact(s):** Federico Zimeri, Operations Manager (operaciones@toallasfaxel.com)  
**Address:** 29 Calle 3-03 Zona 12  
Colonia El Carmen  
Guatemala, Guatemala

**Reply and Date:** 6/8/09: Initial inquiry regarding company’s ability to produce subject fabric. {U1}  
6/19/09: Second inquiry. {U2}  
No responses received.

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

**Reply and Date:** 6/8/09: Initial inquiry regarding company’s ability to produce subject fabric. {V1}  
6/8/09: Company advised that it does not produce fleece. {V2}

**Company:** J. H. Brostex  
**Contact(s):** Byung Taek Chung, Title Unknown (brostex@daum.net)  
**Address:** 12 Calle 0-00 Zona 6  
San Cristobal, Guatemala

**Reply and Date:** 6/8/09: Initial inquiry regarding company’s ability to produce subject fabric. {W1}  
6/19/09: Second inquiry. {W2}  
No responses received.

**Company:** Jung Woo Textiles  
**Contact(s):** Ines Lee, Title Unknown (Guatemala@jungwootextile.com; milove@hanmail.net)  
**Address:** Physical Address Unknown  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {X1}  
6/19/09: Second inquiry. {X2}  
No responses received.

**Company:** Megatextil's  
**Contact(s):** Sung Deok Kim, Title Unknown (megatextiles@hanmail.net)  
**Address:** 41 B Sur 52A-62 PISO 4  
Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {Y1}  
6/19/09: Second inquiry. {Y2}  
No responses received.

**Company:** Modas Amor  
**Contact(s):** Chang Ok Yoo, Title Unknown (changoky@hanmail.net)  
**Address:** Physical Address Unknown  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {Z1}  
6/19/09: Second inquiry. {Z2}  
No responses received.

**Company:** Modas Han Kil  
**Contact(s):** Chang Ok Yoo (mkeo728@hanmail.net)  
**Address:** Physical Address Unknown  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric.  
{AA1}  
6/19/09: Second inquiry. {AA2}  
No responses received.

**Company:** Monte Textil  
**Contact(s):** Juan Carlos Castaneda, Title Unknown (juancarlos@textisur.com)  
**Address:** KM. 18.5 Carretera Al Mayan Golf Club  
Villa Nueva, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AB1}  
6/19/09: Second inquiry. {AB2}  
No responses received.

**Company:** Parktland  
**Contact(s):** Bryan Quan, General Manager (parktland@apparel.com.gt; info@parktland.com)  
**Address:** 17 Calle 5-36 Zona 1  
Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AC1}  
6/19/09: Second inquiry. {AC2}  
7/16/09: After considerable dialogue, the company advised that it would have to knit the fabrics in another facility and that it could only finish fabrics. {AC3}

**Company:** Parracana  
**Contact(s):** Raul Ibarguen Pujol, Title Unknown (parracanacantel@yahoo.es)  
**Address:** 8a. Avenida 11-49 Zona 1, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric.  
{AD1}  
6/19/09: Second inquiry. {AD2}  
No responses received.

**Company:** Rosazu  
**Contact(s):** Francisco Goenz, Title Unknown (francisco.goenz@imerlet.com)  
Luis Guzman, Title Unknown (luis.guzman@imerlet.com)  
**Address:** Lote 55 Monte Maria, Guatemala City, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AE1}  
6/19/09: Second inquiry. {AE2}  
6/19/09: Company advised that it could not produce subject fabric. {AE3}

**Company:** Supratextiles  
**Contact(s):** Raul Ibarquen Garcia-Salas, Title Unknown (rigs@itelgua.com)  
**Address:** 3a. Calle 7-53 A, Zona 2 San Jose, Villa Nueva, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AF1}  
6/19/09: Second inquiry. {AF2}  
No responses received.

**Company:** Tejidos Mundiales  
**Contact(s):** Stefan Meany, Title Unknown (tejidos\_mundiales@hotmail.com;  
tejidos\_mundiales@hilosytelas.com)  
**Address:** Km 18 5 Carretera Mayan Golf Zona Villa Nueva, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric.  
{AG1}  
6/19/09: Second inquiry. {AG2}  
No responses received.

**Company:** Textilera Santa Emilia  
**Contact(s):** Alberto Zimeri Gandara, Title Unknown (textiles@textilesperfecta.com)  
**Address:** Km. 19.5 Carretera A San Jose Pinula, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric.  
{AH1}  
6/19/09: Second inquiry. {AH2}  
No responses received.

**Company:** Textiles Capuano/ Textiles Catania  
**Contact(s):** Alejandro Ortega, Title Unknown (aob@textilescapuano.com)  
**Address:** La. Avenida 3-86, Zona 1 Boca del Monte, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AI1}  
6/19/09: Second inquiry. {AI2}  
No responses received.

**Company:** Textiles Del Pacifico  
**Contact(s):** Rene Castaneda, Title Unknown (rcastaneda@texpasa.com)  
(aguerra@texpasa.com )  
**Address:** 13 Avenida 32-53 Zona 13, Colonia Santa Fe, Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AJ1}  
6/19/09: Second inquiry. {AJ2}  
No responses received.

**Company:** Textiles Modernos  
**Contact(s):** Ligia Maria Illescas (texmosairis@citel.com.gt)  
**Address:** 18 calle 10-56, Zona 1 Guatemala  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric.  
{AK1}  
6/19/09: Second inquiry. {AK2}  
No responses received.

**Honduras:**

**Company:** AKH  
**Contact(s):** Tem McInville, General Manager (temm@anvilknitwear.com)  
**Address:** Parque Industrial Green Valler, C Occidente, KM. 24m Quimistan, Santa Barbara, Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AL1}  
6/19/09: Second inquiry. {AL2}  
6/19/09: Company advised that it could not produce fleece. {AL3}

**Company:** Caracol Knits  
**Contact(s):** Denisse Castellano, General Manager (dcastellano@caracolknits.com)  
Erick Rodriguez (erodriguez@caracolknits.com)  
**Address:** Km. 45 Carr.Hacia Tryucigalpa, Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AM1}  
6/19/09: Second inquiry. {AM2}  
No responses received.

**Company:** Cottonwise Textiles  
**Contact(s):** Chan Wun Kim, General Manager (cwkim@cottonwise.com)  
Mu Hyun Han (cottonwise@cottonwise.com)  
**Address:** Zona Libre cotton Wise  
16 Calle 15 16 Av Bo Canas San Pedro Sula Honduras, Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AN1}  
6/19/09: Second inquiry. {AN2}  
No responses received.

**Company:** Elcatex  
**Contact(s):** Jesus Canahuati, General Manager (chuy@elcatex.com)  
Jose Carlos Seguardo, Account Manager (Jose.seguardo@elcatex.com)  
**Address:** Elasticos Centroamericanos Y Textiles Zona Libre Elcatex Choloma, Cortes, Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AO1}  
6/30/09 Company provided pricing. {AO2}  
6/30/09: Intradeco requested information on company's capacities and requested samples. {AO3}  
7/7/09: Company advised it would not participate in program. {AO4}

**Company:** Industrias Continental  
**Contact(s):** Roberto Diban Canahuati, Title Unknown (rdibaninco@sigmanet.hn;  
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:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AP1}  
6/19/09: Second inquiry. {AP2}  
No responses received.

**Company:** RLA Manufacturing  
**Contact(s):** Erik Rodriguez, General Manager (rodriguez Erik@russellcorp.com)  
Philip Holloway, Title Unknown (garciaedy@russellcorp.com)  
**Address:** Zona Libre La Jutosa, Choloma, Cortes, Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric.  
{AQ1}  
6/19/09: Second inquiry. {AQ2}  
No responses received.

**Company:** Shin Sung Honduras  
**Contact(s):** Arnold Jeong, Title Unknown (jose@shinsung.hn)  
Javier Lee, Title Unknown (javierlee@shinsung.hn)  
Karl Yang, Title Unknown (ksy@ssts.co.kr)  
Jeong Yang Gi, Title Unknown (ygieong@ssts.co)  
**Address:** ZIP San Miguel VI, Rio Nance, Chloma, Cortes, Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AR1}  
6/10/09: Company advised that it could not make subject fabrics. {AR2}

**Company:** Sky Textile Honduras  
**Contact(s):** Ken Tai, Title Unknown (ken\_tai@oceanskyintl.com)  
**Address:** ZIP Rio Blanco, San Pedro Sula  
Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AS1}  
6/19/09: Second inquiry. {AS2}  
No responses received.

**Company:** Woong Chun Honduras  
**Contact(s):** Sunny Lee, Marketing Department (sunnylee@woongchun.com)  
Brian Kwon, Title Unknown (padrino@woongchun.com)  
**Address:** Km. 19.5, Crrt. A Occidente, Naco Quimistan, Sta. Barbara, Honduras  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AT1}  
6/11/09: Company responded to notice from association with questions of fabric specifications, including fabric weight, fiber content and yarn sizes, all of which were contained in the original messages from Intradeco and the association.  
{AT2}  
6/11/09: Intradeco confirmed technical specifications contained in the two previous messages, including the presence of polyester in finished fabric. {AT3}  
6/25/09: Company provided offer, but shrinkage spec was 8x8percent- outside of the stated tolerance. Company also advised its capacity at [\*\*\*\*\*] kgs per week and provided pricing. {AT4}  
6/26/09: Intradeco asked if company was able to meet the shrinkage requirement.  
{AT5}  
6/26/09: Company advised that it could meet 5 percent shrinkage requirement by pre-shrinking fabric. {AT6}  
6/30/09: Intradeco requested additional information regarding process and ability to hit other specs using pre-shrink method. Intradeco noted its experience that the proposed finishing method will affect yarn sizes and fabric weight. {AT7}  
6/30/09: Company requested sample. {AT8}  
6/30/09: Intradeco requested mailing address, clarification regarding ability to hit specs; samples sent. {AT9}  
7/9/09: Intradeco requested status update. {AT10}  
7/09/09: Package not delivered – resent.  
7/10/09: Requested information regarding ability to hit specifications given

alternative production methods. {AT11}  
7/15/09: Company advised it had analyzed fabric sample and could keep shrinkage to 6 percent. {AT12}  
7/15/09: Intradeco stressed that shrinkage requirement was 5 percent. {AT13}  
7/16/09: Company advised that it could hit 5 percent shrinkage. {AT14}  
7/23/09: Intradeco questioned company's ability to meet shrinkage requirements and asked for additional information on company's ability to meet all specifications. {AT15}  
7/23/09: Company advised that it did not initially realize fabric contained polyester and reaffirmed that it could meet shrinkage specification, but failed again to respond to questions regarding experience, shrinkage processes, and its overall ability to produce subject fabric. {AT16}

***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:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AU1}  
6/19/09: Second inquiry. {AU2}  
6/19/09: Company advised that it could not produce subject fabric. {AU3}

**Company:** Clover Knits, Inc.  
**Contact(s):** Kevin McCarter, President (Kevin@cloverknits.com) (803-222-3021)  
**Address:** 1075 Jackson Hts  
Clover, SC 29710  
**Reply and Date:** 6/23/09: Company contacted Intradeco regarding fabrics. {AV1}  
6/23/09: Intradeco sent precise fabric specifications. {AV2}  
6/23/09: Company requested additional information on specifications and quantities. {AV3}  
6/23/09: Intradeco provided information and asked about company's capacity. {AV4}  
6/25/09: Company provided address for sending sample. {AV5}  
6/26/09: Samples sent  
7/09/09: Requested follow up. {AV6}  
7/16/09: Requested follow up. {AV7}  
No further communications received.

**Company:** Russ Knits, Inc.  
**Contact(s):** David Martin, Vice President (dmartin@russknits.com) (910-974-4114)  
**Address:** 520 East Main Street  
Candor, N.C. 27229  
**Reply and Date:** 6/15/09: Company advised it could help find a source for the subject fabrics. {AW1}  
6/15/09: Full product specifications were provided. {AW2}  
6/15/09: Company advised that it could not product subject fabric, but that it would contact Clover Knits. {AW3} Separate communications were held directly with Clover (see above).

**Company:** Milliken & Co;  
**Contact(s):** Submitted via company website:  
<http://www.visaendurance.com/contactus/Pages/ContactUs.aspx>  
**Address:** 920 Milliken Road  
Spartanburg, SC 29304  
**Reply and Date:** 6/18/09: Submitted request on line for subject fabric. {AX1}  
6/25/09: Second request. {AX2}  
No responses received.

**Company:** MJ Soffe  
**Contact(s):** Customer Service (customerservice@mjsoffe.com)  
**Address:** 1 Soffe Dr.  
Fayetteville, NC 28301-5262  
**Reply and Date:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric.  
{AY1}  
6/19/09: Second inquiry. {AY2}  
No responses 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:** 6/8/09: Initial inquiry regarding company's ability to produce subject fabric. {AZ1}  
6/19/09: Second inquiry. {AZ2}  
No responses received.

*(ii) Identification of CAFTA-DR suppliers*

As part of its due diligence, Intradeco directly contacted the trade associations representing the DR-CAFTA countries' textile industries. They also contacted numerous individual companies throughout the DR-CAFTA region that based upon inquiries and experience could conceivably produce the fabrics in question. To the best of its knowledge and ability, Intradeco 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 Intradeco 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. Intradeco 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 Intradeco.

(v) *Provision of Samples*

In the course of the business dialogue, Intradeco provided samples to three potential suppliers. None provided a counter sample.

(vi) *Substitutability of Products*

One company, Woong Chun, proposed to use an alternative method (pre-washing) to achieve the required shrinkage tolerance of five percent in both directions. Based on Intradeco's experience, the proposed process would have resulted in a fabric that would not have met many of the other technical requirements including weight and yarn sizes and would possess a hand and feel that would differ from fabrics made using a heat transfer method. Despite repeated requests for information from Woong Chun as to how a fabric made in this manner could be substitutable, the company never replied nor did Woong Chun explain if it would still be able to meet all of the specifications of the subject fabric.

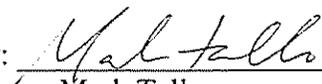
**(4) Substitutable Products**

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

Intradeco is unaware of any supplier that produces a substitutable product in the DR-CAFTA 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

# ANNEX

## Fabric #1

Cotton / Polyester Three Thread Circular Knit Fleece Fabric

Fiber Content: 77-83% cotton / 17-23% polyester

Yarn Size:

1. Face yarn

100% combed cotton ring spun,  
49/1 to 54/1 metric (29/1 to 32/1),

in each of the following configurations:

- a.) 100% bleached or dyed cotton
- b.) 95% undyed cotton / 5% dyed cotton
- c.) 90% undyed cotton / 10% dyed cotton
- d.) 80% undyed cotton / 20% dyed cotton
- e.) 70% undyed cotton / 30% dyed cotton
- f.) 60% undyed cotton / 40% dyed cotton
- g.) 50% undyed cotton / 50% dyed cotton
- h.) 40% undyed cotton / 60% dyed cotton
- g.) 30% undyed cotton / 70% dyed cotton
- h.) 25% undyed cotton / 75% dyed cotton
- i.) 20% undyed cotton / 80% dyed cotton

The percentages stated above may vary by up to two percentage points.

2. Tie yarn: 176 to 184/48 filament metric filament polyester (49 to 51 /48 filament denier)

3. Fleece yarn: 67-73% carded cotton 26/1 to 30/1 metric ring spun / 27-33% 3600-4500 metric polyester staple,  
(15.5/1 to 18/1 ring spun / 2.0 – 2.5 denier polyester staple,)

Machine gauge: 21

Weight: 232-271 grams per square meter (6.85 to 8.0 ounces per square yard)

Width: Not less than 152 centimeters cuttable) - (60 inches)

Finish: Napped on technical back; bleached and/or dyed; of yarns of different colors

Performance criteria: Not more than 5% vertical and horizontal shrinkage; not more than 4% vertical torque.