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## COMMERCIAL AVAILABILITY REQUEST

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- - PUBLIC VERSION - -

August 8, 2008

Mr. R. Mathew Priest  
Chairman, Committee for Implementation of Textile Agreements  
Office of Textiles and Apparel, Room H3100  
U.S. Department of Commerce  
14<sup>th</sup> 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 Mr. Priest,

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 72 Fed. Reg. 13,256 (March 21, 2006) ("Final Procedures"), Sorini, Samet & Associates, LLC ("SS&A") requests that the fabric described herein ("the fabric") be added to the list in Annex 3.25 of CAFTA-DR in an unrestricted quantity.

The fabric is not available in commercial quantities in a timely manner from a supplier in the CAFTA-DR countries. Hansoll and SS&A made this determination after a thorough exploration of the market in CAFTA-DR countries in an attempt to secure the fabric from potential suppliers. It is following a good faith effort to secure the fabric that Hansoll and SS&A submit this commercial availability request.

### **I. Detailed Product Description**

The fabric is a raschel knit open work crepe, which has a unique "blistered" face requiring each of the constituent yarns to be fed separately, with small, regular open-work interstices, representing about 15 percent of the total surface area. The fabric is a blend of cotton, nylon, and spandex.

Fabric Type	Raschel Knit Open Work Crepe
Fiber Content	75% Cotton; 22% Nylon; wrapped around 3% Spandex (All yarns are in the condition received by the mill and must be formed in a CAFTA-DR country)
Yarn Size	Cotton 17.10/2 to 18.90/2 (28.50/2 to 31.50/2 metric); Nylon 38 to 42 denier/10 filament (213.75 to 236.25 metric/10 filament); Spandex 199.50 to 220.50 denier (40.85 to 45.15 metric)
Machine Gauge	18
Number of Bars	18
Fabric Weight	0.45 to 0.50 linear yards per pound (0.155 to 0.171 kilograms per square meter)
Fabric Width	Not less than 54 to 58 inches – cuttable (137.2 centimeters to 147.3 centimeters - cuttable)
Finishing Processes	(Piece) Dyed or Printed
Quantity	[[***]] per month delivered to Guatemala from [[***]]
HTSUS	6005.22.00; 6005.24.00

## **II. Quantity**

Hansoll requires [[\*\*\*]] per month delivered to Guatemala from [[\*\*\*]].

## **III. Due Diligence**

SS&A contacted several companies and associations that represent textile producers and knitting interests in the United States and the CAFTA-DR region. These efforts did not result in identifying any parties that were able to supply the fabric in the time and quantities required by Hansoll.

The following information sets forth the firms and associations that were contacted with regard to whether they could supply the fabric within the specifications described in Section I of this submission. Confirmations of the contacts are provided within Appendix I of the confidential version of this submission. All communications were conducted via e-mail unless otherwise noted.



**(1) Association: National Textile Association, NTA**

Contact: David Trumbull ([dtrumbull@nationaltextile.org](mailto:dtrumbull@nationaltextile.org))  
Address: 6 Beacon Street, Suite 1125  
Boston, MA 02108  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding members' ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: Circulated to members with deadline for response by July 23, 2008.  
Reply and Date: July 23, 2008: Trumbull replied that he received no responses from his membership.

**(2) Association: National Council of Textile Organizations, NCTO**

Contact: Mike Hubbard ([mhubbard@ncto.org](mailto:mhubbard@ncto.org))  
Address: P.O. Box 99 – Gastonia, NC 28053  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding members' ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: Members do not make this fabric, but yarn producers may sell to companies that do – will follow up. Invista (22) contacted SS&A via NCTO inquiry.

**(3) Association: American Manufacturing Trade Action Coalition, AMTAC**

Contact: Sarah Ormond ([sormand@amtacdc.org](mailto:sormand@amtacdc.org))  
Lloyd Wood  
Address: 910 16th St. NW  
Washington, DC 20006  
Date Contacted: July 15, 2008  
Nature of request: Inquiry regarding members' ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: Circulated to membership.  
Follow-up: July 22, 2008: SS&A asked if there were member responses to the inquiry.  
Reply and Date: July 22, 2008: Ormond transferred to a different contact to provide details of member responses. Safer Textile – Kuttner Prints (23) contacted SS&A via AMTAC inquiry.  
Reply and Date: July 23, 2008: Ormond suggested SS&A contact Textile Transprint Co. (21).

**(4) Association: Nicaraguan Textile and Apparel Association**

Contact: ([nicaind@aol.com](mailto:nicaind@aol.com)); ([director@anitec.net](mailto:director@anitec.net))  
Address: Zona Franca "Las Mercedes" km 12 1/2 Carretera Norte  
Managua, Nicaragua  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding members' ability to supply subject fabric.

Sample Provided: No  
Follow-up: July 22, 2008: Inquiry regarding members' ability to supply subject fabric.  
Follow-up: July 27, 2008: Inquiry sent to second contact ([director@anite.com](mailto:director@anite.com)).  
Reply and Date: No response from association.

**(5) Association: Honduran Manufacturers Association**

Contact: Martha Benavides ([direcciontecnica@ahm-honduras.com](mailto:direcciontecnica@ahm-honduras.com));  
Astrid Barnica ([servicioalcliente@ahm-honduras.com](mailto:servicioalcliente@ahm-honduras.com))  
Address: Edificio Yude Canahuati 3er y 4to Piso  
Avenida Circunvalacion, S.O.  
San Pedro Sula, Cortes, Honduras C.A.  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding members' ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: Benavides transferred message to a different contact.  
Reply and Date: July 16, 2008: Barnica sent list of membership, and suggested contacting Shinsung Textiles regarding the merchandise.  
Follow-up: July 17, 2008: SS&A asked if the request was circulated to broader membership, and encouraged members to contact SS&A regarding production of the merchandise.  
Reply and Date: July 18, 2008: Barnica confirmed the request was circulated to the membership, and mentioned that Shinsung Textiles (16) expressed interest.  
Follow-up: July 23, 2008: SS&A requested additional contact information for Yangtex and Shinsung (16).  
Reply and Date: July 23, 2008: Barnica replied with a new contact information for Shinsug Textiles, and confirmed inability to reach Yangtex.

**(6) Association: Union de Industrias Textiles (UNITEX)**

Contact: Ingrid Burgos ([unitex\\_gg@telesal.net](mailto:unitex_gg@telesal.net))  
Address: Calle Liverpool y Calle Roma, Edif ASI. Col. Roma, San Salvador, El Salvador  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding members' ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 22, 2008: Inquiry regarding members' ability to supply subject fabric.  
Reply and Date: No response from the association.

**(7) Company: Milliken**

Contact: Kathi Dutilh ([kdutilh@millikendc.com](mailto:kdutilh@millikendc.com))  
Address: P.O. Box 1926



Spartanburg, SC 29304  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: Company does not make the product.

**(8) Company: Liztex**

Contact: Saul Mishaan ([saul@liztex.com](mailto:saul@liztex.com))  
Address: Km. 30.5 Carretera al Pacifico Parque del Lago Amatitlán  
San Ignacio Mixco, 01007 Guatemala  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: No Raschel knitting machines in their plant.

**(9) Company: FAB Industries**

Contact: Steve Meyer ([sem4@msn.com](mailto:sem4@msn.com))  
Address: 98 Cutter Mill Road, Suite 412 North  
Great Neck, New York 11021  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 22, 2008: Inquiry regarding ability to supply subject fabric.  
Reply and Date: No response from the company.

**(10) Company: Textufil**

Contact: Hector Rico ([hector@textufil.com](mailto:hector@textufil.com))  
Address: 12 Avenida Sur Contiguo a Industrias Caribe, Soyapango  
San Salvador, El Salvador, C.A.  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 22, 2008: Inquiry regarding ability to supply subject fabric.  
Reply and Date: No response from the company.

**(11) Company: St. Jacks**

Contact: Sergio Siman ([ssiman@stjacks.com](mailto:ssiman@stjacks.com))  
Johanna Quinonez ([jquinonez@stjacks.com](mailto:jquinonez@stjacks.com))  
Address: Calle Circunvalacion Poligono A Ste. 4, Antiguo Cuscatlan, La  
Libertad, , El Salvador  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No

Reply and Date: July 15, 2008: Siman transferred message to a different contact.  
Reply and Date: July 21, 2008: Quinonez replied that company does not process any spandex fabric, but inquired about providing other knitting services.  
Reply and Date: July 23, 2008: SS&A asked Quinonez to confirm that St. Jacks does not have capabilities to process the fabric to the specifications.  
Reply and Date: No response from the company.

**(12) Company: Elasticcorp**

Contact: R. Castillo ([rcastillo@elasticcorp.com](mailto:rcastillo@elasticcorp.com))  
Address: 455 Hwy. 70  
Columbiana, AL 35051  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 22, 2008: Inquiry regarding ability to supply subject fabric.  
Reply and Date: No response from the company.

**(13) Company: Lacetex SA**

Contact: Ricardo Gharzouzi ([ricardo@lacetex.com](mailto:ricardo@lacetex.com))  
Address: Ave. Petapa 40-51 Zona 12  
Guatemala 01012 Guatemala  
Date Contacted: July 15, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: Cannot produce the product.

**(14) Company: Caracolknits**

Contact: Denisse Castellanos ([dcastellanos@caracolknits.com](mailto:dcastellanos@caracolknits.com))  
Address: Zona Libre El Caracol, Km 200 carretera a Tegucigalpa  
Date Contacted: July 18, 2008.  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 25, 2008: Inquiry regarding ability to supply subject fabric.  
Reply and Date: July 25, 2008: Company not currently accepting orders.

**(15) Company: I.C.A.T., S.A. de C.V**

Contact: Antonio Rivas ([icatsa@navegante.com.sv](mailto:icatsa@navegante.com.sv))  
Address: Zona Industrial Plan de La Laguna  
Poligono G, lote 2, El Salvador  
Date Contacted: July 15, 2008



Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 15, 2008: Do not produce fabrics, only full packages.

**(16) Company: Shinsung Textiles**

Contact: Arnold Jeong ([ygieong@ssts.co.kr](mailto:ygieong@ssts.co.kr))  
Javier Lee ([javierlee@shinsung.hn](mailto:javierlee@shinsung.hn))  
Karl Yang ([ksy@ssts.co.kr](mailto:ksy@ssts.co.kr))  
Address: Zona Libre San Miguel VI, Río Nance, Choloma  
Cortés, Honduras  
Date Contacted: July 18, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 23, 2008: Sent inquiry to a different contact (Lee).  
Follow-up: July 29, 2008: Sent Lee inquiry regarding ability to supply  
subject fabric.  
Reply and Date: July 29, 2008: Yang replied that warp fabric is not available in  
the facility.

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

Contact: Wilfredo Modenessy ([wmodenessy@rkhsa.com](mailto:wmodenessy@rkhsa.com))  
Address: Green Valley Industrial Park, Lote 7B, Km. 23, Quimistan  
Santa Barbara, Honduras  
Date Contacted: July 21, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 29, 2008: Inquiry regarding ability to supply subject  
fabric.  
Reply and Date: No response from the company.

**(18) Company: Woong Chun Honduras, S.A.**

Contact: Luis Ryu ([Honduras@woongchun.com](mailto:Honduras@woongchun.com))  
Brian Kwon ([brainkwon@woongchun.com](mailto:brainkwon@woongchun.com))  
Address: Km. 19.5, Carretera al Occidente, Naco  
Santa Barbara, Honduras  
Date Contacted: July 21, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Reply and Date: July 23, 2008: Kwon replied that they do not supply the fabric  
to the specifications.

**(19) Company: Lace Lastics**

Contact: Tim Smith ([information@lancelastics.com](mailto:information@lancelastics.com)), (919) 693-2100  
Address: Pine Tree Road, Oxford, NC 27565  
Date Contact: July 22, 2008

Nature of Request: Left voicemail and email inquiry regarding ability to produce subject fabric.  
Sample Provided: No  
Follow-up: July 29, 2008: Left voicemail and email inquiry regarding ability to produce subject fabric.  
Reply and Date: July 30, 2008: Replied with voicemail that the company does not have the machinery to make the fabric.

**(20) Company: Metritek**

Contact: Bob Jablin (561) 995-2414  
Address: 6100 Park of Commerce Blvd, Boca Raton, FL 33487  
Date Contact: July 22, 2008  
Nature of Request: Telephone inquiry regarding ability to produce subject fabric.  
Sample Provided: No  
Reply and Date: July 22, 2008: Company does not work with cotton.

**(21) Company: Textile Transprint Co.**

Contact: John Bello ([moonoochee@aol.com](mailto:moonoochee@aol.com))  
Address: Unknown  
Date of Contact: July 23, 2008  
Nature of Request: Inquiry regarding ability to supply subject fabric.  
Sample Provided: No  
Follow-up: July 29, 2008: Inquiry regarding ability to supply subject fabric.  
Reply and Date: No response from the company.

**(22) Company: Invista**

Contact: Mary Vane ([mary.vane@invista.com](mailto:mary.vane@invista.com))  
Address: 4123 East 37th Street North  
Wichita, KS 67220  
Reply and Date: July 17, 2008: Reply from NCTO (2) inquiry. Vane recommended contacting Lace Lastics (19) and Metritek (20).  
Sample Provided: No

**(23) Safer Textile – Kuttner Prints**

Contact: Bobby Petrenko ([bpetrenko@safertextiles.com](mailto:bpetrenko@safertextiles.com)) 973-482-6400  
Address: 1875 McCarter Hwy.  
Newark N.J. 07104  
Reply and Date: July 15, 2008: Telephone reply from AMTAC (3) inquiry. Petrenko stated that Safer Textile is a printing service, not a fabric producer, but requested a sample to share with contractors.  
Reply and Date: July 16, 2008: Email reply to confirm request of fabric sample.  
Sample Provided: Yes: July 17, USPS Express Mail – next day service.



Follow-up: July 17, 2008: SS&A asked for fabric producers to send sample to SS&A based on outlined specifications, and encouraged fabric producers to contact SS&A directly.  
Follow-up: July 18, 2008: SS&A email to confirm receipt of fabric sample.  
Follow-up: July 22, 2008: SS&A voicemail to confirm receipt of fabric sample.  
Reply and Date: No response from company.

As a result of these inquiries, SS&A and Hansoll Textile, Ltd. 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**

Fabrics that do not incorporate the yarn types described in Section I of this submission or are knit on a machine different from that described are not substitutable for the fabric. The aesthetics – a soft hand and appearance – require the yarns and machinery specified herein. The appearance – a complicated (18 bar) crepe-like “blister” stitch with regular open work interstices, is essential. This is the “look” that Hansoll has contracted to meet the order requirements of its customers.

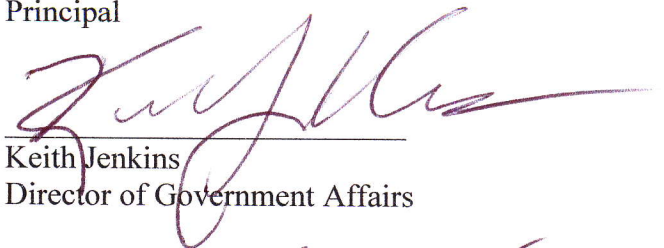
If you have any questions or require further information with regard to this request, please contact Andrew Samet or Keith Jenkins at (202) 248-5090, or [asamet@ssa-dc.com](mailto:asamet@ssa-dc.com) or [kjenkins@ssa-dc.com](mailto:kjenkins@ssa-dc.com).

Sincerely,



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Andrew J. Samet  
Principal



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Keith Jenkins  
Director of Government Affairs

*AUGUST 8, 2008*

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Date