



Consulting and Government Affairs Practice

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COMMERCIAL AVAILABILITY REQUEST

- - PUBLIC VERSION - -

November 10, 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 inquiries, 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>Raschel knit open work crepe fabric with a blistered surface with interstices covering 15% of the surface area, printed.</p>

All values listed in metric measurements			Low parameter	High parameter
Fiber content	Cotton		61%	65%
	Nylon		32%	34%
	Spandex		3%	5%
Yarn size	Cotton		28 /2	32 /2
	Nylon	Denier	150	160
		Filament	10	10
	Nylon (wrapping yarn for spandex core)	Denier	113	150
		Filament	36	36
	Spandex (wrapped in nylon)	Denier	40	45
Weight (grams per square meter)			160	180
Width (centimeters), cuttable			137.2	147.4
Quantity (square meters per month)			***]	***]
Machine gauge			18	
Bar			18	
Coloration			Pigment print	
HTSUS			6005.24.00	
Performance criteria		1. Dimensional stability: -7%/ +2%, AATCC 135/150 2. Fabric skewing: 4%, AATCC 179 3. Fabric weight: -8%/ +8%		

II. Quantity

Hansoll requires [*** 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.

The list of potential suppliers was compiled through (1) SS&A's and Hansoll's experience in three prior commercial availability petitions addressing raschel 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.

All contacts were made by email unless otherwise indicated. A full account of correspondence is included in Appendix II to this Request.

U.S. ASSOCIATIONS

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

Contact: Sara Beatty, Vice President of International Trade:
sbeatty@amtacdc.org
Address: 910 16th St. NW, Washington, DC 20006
Date Contacted: October 20, 2011
Nature of request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
Sample Provided: No
Reply and Date: October 20, 2011: AMTAC circulated to membership.

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: October 20, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
Sample Provided: No
Reply and Date: October 20, 2011: NCTO circulated 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: October 20, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
Sample Provided: No
Reply and Date: October 20, 2011: NTA circulated to membership.

DR/CENTRAL AMERICA ASSOCIATIONS

Association: **Honduran Manufacturers Association**

Contact: Astrid Barnica, Client Services:
servicioalcliente@ahm-honduras.com

Address: Edificio Yde Canahuati 3er y 4to Piso, Avenida Circunvalacion, S.O., San Pedro Sula, Cortes, Honduras, C.A.
Date Contacted: October 20, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
Sample Provided: No
Reply and Date: No response from association.

Association: Nicaraguan Textile & Apparel Manufacturers Association (ANITEC)

Contact: Dean Garcia Foster, Executive Director: director@anitec.net
Address: Zona Franca "Las Mercedes" km 12 ½ Carretera Notre Managua Nicaragua
Date Contacted: October 20, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
Sample Provided: No
Reply and Date: No response from association.

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

Contact: Patricia Figueroa, Managing Director: direccion@camtex.com.sv
Address: Calle Liverpool y Calle Roma, edif. ASI. Col. Roma San Salvador, El Salvador
Date Contacted: October 20, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
Sample Provided: No
Reply and Date: October 20, 2011: CAMTEX circulated to membership.

Association: Costa Rican Chamber of Textiles

Contact: Annia Sequera, Director: asegura@textilescr.com
Address: Apartado 1512 1002 Pase de Estudiantes San Jose, Costa Rica
Date Contacted: October 20, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
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: October 20, 2011

Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
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: October 20, 2011
Nature of Request: Inquiry to members' ability to supply subject fabric, and request that potential suppliers contact directly if interested.
Sample Provided: No
Reply and Date: October 24, 2011: VESTEX replied that Textiles Perfecta has the machinery to produce it and they are interested to see a swatch in order to confirm their capability.

UNITED STATES

Company: **Ames Textile Corp.**

Contact: info@amestextile.com (no contact name/title provided)
Address: 710 Chelmsford St., Lowell, MA 01851
Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow up: October 27, 2011
Reply and Date: No response from company.

Company: **Elastic Fabrics of America**

Contact: Jack Boyd, EVP: jboyd@elasticfabrics.com
Address: 3112 Pleasant Garden Road, PO Box 21986, Greensboro, NC 27406
Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: Yes
Reply and Date: October 25, 2011: Elastic Fabrics replied that they do not currently make the subject fabric, but asked to review a sample in order to confirm whether they can make it.
Reply and Date: October 25, 2011: Hansoll sent fabric samples to Elastic Fabrics, and asked whether Elastic Fabrics has ever produced the subject fabric, and if so, requested information on quantities produced, brands supplied, and a swatch to analyze. Hansoll asked that if Elastic Fabrics has not produced the subject fabric, to outline the proposed development process.

Reply and Date: October 26, 2011: Elastic Fabrics replied that they have never made the subject fabric, but will need to analyze the sample to determine whether they can make it.

Follow-up: November 7, 2011

Reply and Date: November 7, 2011: Elastic Fabrics replied that they cannot supply the fabric.

Company: **McMurray Fabrics**

Contact: Brian McMurray, President:

Brian_McMurray@mcmurrayfabrics.com

Address: 105 Vann Place Aberdeen, NC 28315-0067

Date Contacted: October 26, 2011

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

Sample Provided: No

Follow-up: October 31, 2011

Reply and Date: October 31, 2011: McMurray Fabrics replied that they cannot supply the fabric.

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

Follow-up: October 31, 2011

Reply and Date: November 1, 2011: Polartec replied that they cannot supply the fabric to the specifications.

Company: **Swisstex**

Contact: Michelle Reyes, Sales Contact: michelle@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 unable to produce raschel knits.

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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: No response 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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: No response 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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: No response from company.

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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: October 27, 2011: Nemtex replied that they will check to see if they can produce the fabric.
Reply and Date: November 1, 2011: Nemtex replied that they do not have the machines to produce the fabric.

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

Contact: Claudia Villacorta, Customer Service Coordinator Commercial
Department: cvillacorta@pettenati.com.sv
Francesco Pilenga, Sales Contact: fpilenga@pettenati.com.sv
Address: KM 42 Carretera a Santa Ana Coatepeque, Aanta Ana, El Salvador

Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: Yes
Reply and Date: October 21, 2011: Pettenati replied that the subject fabric is warp knit, not circular, and noted they could provide an alternative.
Reply and Date: October 24, 2011: SS&A replied in agreement that the fabric is not circular knit. SS&A asked whether Pettenati could produce the subject fabric, and asked what was meant by alternatives.
Reply and Date: October 24, 2011: Pettenati replied that before it would invest more of its employees' time, it needed to know the name of the brand needing the fabric, and whether the inquiry is related to short supply process.
Reply and Date: October 24, 2011: SS&A replied that this is a preliminary investigation on behalf of the client, and that SS&A would put its client in direct contact with Pettenati to discuss details if Pettenati indicated it could supply the fabric. SS&A again asked if Pettenati could supply the subject fabric.
Reply and Date: October 26, 2011: Hansoll sent fabric samples to Pettenati, and asked whether Pettenati has ever produced the subject fabric, and if so, requested information on quantities produced, brands supplied, and a swatch to analyze. Hansoll asked that if Pettenati has not produced the subject fabric, to outline the proposed development process.
Follow-up: November 3, 2011
Reply and Date: November 5, 2011: Pettenati replied that they cannot produce the fabric.

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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: October 20, 2011: Rayones replied that they do not have raschel knit production.

GUATEMALA

Company: Fabrica La Roca

Contact: Jorge Alejandro Arnau, Sales Contact: arnaujorge@gmail.com
Address: KM 7.5 Ruta al Atlántico Zona 18, Guatemala 01018 C.a., Guatemala

Date Contacted: October 24, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 31, 2011
Reply and Date: October 31, 2011: Fabrica la Roca replied that they cannot supply the fabric.

Company: **Hilos Y Telas**

Contact: Christian Signoret, CEO: csignoret@hilosytelas.com
Address: 34 Calle 7-42 Zona 11, Colonia Las Charcas, Guatemala, Guatemala

Date Contacted: October 24, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: October 27, 2011: Hilos y Telas replied that they do not produce warp fabric.

Company: **Imperialtex**

Contact: Carla Robles, Sales Contact: carla.robles@imperialtex.com
Address: Calzada Roosevelt 34-21 zona 11, Guatamala

Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: Imperialtex replied that they cannot do the fabric.

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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: October 20, 2011: Liztex replied that they do not do raschel knitting.

Company: **Parktlund**

Contact: Bryan Quan, General Manager: bquan@parktlund.com
Address: 17 Calle 5-36 Zona 1, Guatemala

Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: No response from company.

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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: No response from company.

Company: **Textiles Del Sur International, S.A. (Textisur/Monte Textil)**

Contact: Juan Carlos Castaneda, Manager: juancarlos@textisur.com
Address: KM. 18.5 Carretera Al Mayan Golf Club, Villa Nueva,
Guatemala
Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: Yes
Reply and Date: October 24, 2011: Textisur asked to review a sample.
Reply and Date: October 24, 2011: SS&A asked if Textisur has machinery to
produce raschel knit fabric at over 500,000 yards per month.
Reply and Date: October 24, 2011: Hansoll asked whether Textisur has ever
produced the subject fabric, and if so, requested information on
quantities produced, brands supplied, and a swatch to analyze.
Hansoll asked that if Textisur has not produced the subject
fabric, to outline the proposed development process.
Reply and Date: October 25, 2011: Textisur replied that before they would
answer Hansoll's questions, they need to analyze fabric
samples. Textisur also requested Hansoll's courier account
information to send product catalogue and company profile.
Reply and Date: October 25, 2011: Hansoll sent its courier account to Textisur,
and asked that Textisur send any samples of the subject fabric
it has produced in the past.
Reply and Date: October 27, 2011: Hansoll informed Textisur that they would
arrange a meeting in Guatemala to review fabric samples.
Meeting: November 5, 2011: Hansoll met with Textisur at Textisur plant
in Guatemala. Textisur reviewed samples and confirmed that it
cannot supply the fabric. Full details of this meeting are
outlined in Appendix II to this Request.
Follow-up: November 7, 2011: Hansoll emailed to request confirmation
that Textisur cannot supply the fabric.
Reply and Date: November 8, 2011: Textisur replied that they cannot produce
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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: October 20, 2011: Textiles Perfecta says fabric is not in their product mix.

HONDURAS

Company: Elcatex

Contact: Karla Pineda, Product Development Manager:
karla.pineda@elcatex.com
Address: Elásticos Centroamericanos Y Textiles Zona Libre Elcatex
Choloma, Cortes, Honduras
Date Contacted: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Reply and Date: October 21, 2011: Elcatex replied that they do not have machines to produce this type of fabric.

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

Contact: Wilfredo Modenessy, Sales Contact:
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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: No response 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: October 20, 2011
Nature of Request: Inquiry to ability to supply subject fabric.
Sample Provided: No
Follow-up: October 27, 2011
Reply and Date: October 27, 2011: Woonchung responded that they do not make raschel fabric.

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

IV. Substitutable Products

The subject fabric has a unique appearance achieved through a complicated (18 bar) crepe-like “blister” stitch with regular open work interstices. This is the “look” that Hansoll has contracted to meet the order requirements of its customers. For the particular look 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 10, 2011

Date

APPENDIX I

Fabric Description: Raschel knit open work crepe fabric with a blistered surface with interstices covering 15% of the surface area, printed.					
All values listed in English measurements				Low parameter	High parameter
Fiber content	Cotton			61%	65%
	Nylon			32%	34%
	Spandex			3%	5%
Yarn size	Cotton			16.5 /2	19 /2
	Nylon	Denier		56	60
		Filament		10	10
	Nylon (wrapping yarn for spandex core)	Denier		60	80
		Filament		36	36
	Spandex (wrapped in nylon)	Denier		200	225
Weight (ounces per square yard)				4.7	5.3
Width (inches), cuttable				54	58
Quantity (yards per month)				545,615	589,655
Machine gauge				18	
Bar				18	
Coloration				Pigment print	
Performance criteria		1. Dimensional stability: -7%/ +2%, AATCC 135/150 2. Fabric skewing: 4%, AATCC 179 3. Fabric weight: -8%/ +8%			

APPENDIX II

[[[***]]]