

**1 Marubeni Drive; Columbus, Georgia 31907 USA**  
**Telephone: 706-569-0404/Fax: 706-565-3377/www.denimna.com**

**PUBLIC VERSION**

May 27, 2008

Chairman,  
Committee for the Implementation of  
Textile Agreements (CITA)  
U.S. Department of Commerce  
14th Street & Constitution Avenue, N.W.  
Room H3100A  
Washington, D.C. 20230

**Re: Response to 115.2009.05.13 – Certain Denim Classifiable under  
HTS Number 5209.42.00 - Request under the Commercial Availability  
Provision of the Dominican Republic-Central America-United States  
Free Trade Agreement Implementation Act**

Dear Mr. /Madam Chairman:

Denim North America submits this Response with an Offer to Supply to the request for a commercial short supply designation for certain denim fabric under Request Number 115.2009.05.13. Denim North America can supply the subject product, meeting all specifications, in commercial quantities in a timely manner.

Our company is the leading manufacturer of stretch denim in the United States and its denims are known for their innovative constructions and high performance. Customers for our denim currently include [\*\*\*\*\*].

Over the past two years, Denim North America has produced over [\*] million square meters of stretch denim that falls within the weight specifications of the fabric described in the request. Our denim is produced on Picanol air-jet looms that are ideally suited for weaving denim. They have been used for this purpose for the past 10 years and operate at high efficiencies.

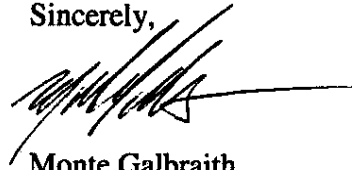
In order to meet the specifications for the requested fabric EXACTLY, some modifications are required and these can be easily made. Certain yarns will have to be obtained from our current US supplier and those yarns will be CAFTA/DR qualifying. Some new reeds for the looms will be needed and these are readily available from current suppliers and easily installed. Denim North America can make these changes quickly to meet the customer's time for delivery.

In the past 24 months Denim North America has produced over [\*\*] million square meters of stretch denim of various types at its Columbus, Georgia facility. Currently, stretch denim accounts for [\*\*] percent of our total denim production and for the past 2 years it has averaged [\*\*] percent, but we have the ability and capacity to shift significant additional production to stretch denim and would do so to meet any new orders. If demand warrants, we can readily shift 100 percent of our production capacity to stretch denim.

Had American Design Industries contacted us before its request to CITA was made, Denim North America would have responded with an offer to supply the fabric that is described in this request in the quantity that is requested and within the customer's timeframe. We are ready to make such an offer now to supply in a timely manner the quantity of fabric being sought and ask that CITA deny the short supply request.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Monte Galbraith', with a long horizontal flourish extending to the right.

Monte Galbraith  
President

**INTERESTED PARTY'S DUE DILIGENCE CERTIFICATION**

I, Monte Galbraith, President, Denim North America certify that:

- I have read the attached submission, and
- The information contained in the submission is, to the best of my knowledge, complete and accurate.

Signed:

A handwritten signature in black ink, appearing to read 'Monte Galbraith', with a long horizontal flourish extending to the right.

Monte Galbraith

Date: May 19, 2009