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January 15, 2013

PUBLIC VERSION

Kim Glas, Chair
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 Composite
Laminated Fabric**

Dear Ms. Glas:

On behalf of our client, VF Corp. ("VF") 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 CAFTA-DR country. We respectfully request that the subject fabric described in the Annex be added to the list in Annex 3.25 of the Agreement in unrestricted quantity because the fabric is 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 a composite fabric consisting of a three layered bonded fabric with woven face and knit fleece backing bonded with an air/wind/water-proof polyurethane (PU) membrane. The composite fabric is classifiable under HTSUS subheading 6001.22.

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 in construction to an existing fabric previously determined by CITA to be unavailable in commercial quantities in a timely manner from a supplier in the CAFTA-DR countries and are contained in Annex 3.25.¹

These standards and specifications were explained to all potential suppliers.

Timing was expressed as the annual quantity being supplied.

(2) Quantity

VF requires approximately [*****] yards ([*****] meters) per year on the following schedule: January-March: [*****] yards ([*****] meters); April-June: [*****] yards ([*****] meters); July-September: [*****] yards ([*****] meters); October-December: [*****] yards ([*****] meters).

(3) Due Diligence

(i) Generally

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

VF directly contacted all potential suppliers to locate sources for the subject fabrics, as well as the industry associations in all CAFTA-DR countries. No company indicated that they could supply CAFTA-DR subject fabric.

Details of the salient points of VF's communications with the various companies and trade associations in the region with regard to whether they or their members could supply the subject fabric within the specifications described in the Annex to this submission are described below.² Copies of the contacts are provided in the attachment of the confidential version of this submission.³

¹ See CITA Reference Number: 38.2007.12.26.Fabric.ColumbiaSportswearCo.

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

³ Please note that while identical fabric specifications were attached to each email request, they have only been reproduced for the first email communication {1-1}.



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: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {1-1}
10/29/2012: Association advised that no companies in the Dominican Republic produce the subject fabric. {1-2}

Association: *American Manufacturing Trade Action Coalition*
Contact(s): Sara Ormand Beatty, Director of International Trade (sbeatty@amtadc.org)
Lloyd Wood, Director of Membership and Media Outreach (lwood@amtadc.org)
Address: 910 16th Street, N.W., Suite 760
Washington, D.C. 20006

Reply and Date: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {2-1}
11/01/2012: Association advised that is forwarded the request to its members and would let VF know if any member expressed interest. {2-2}
No response received.

Association: *Costa Rican Chamber of Textiles*
Contact(s): Annia Sequra, Director (asegura@textilescr.com)
Address: Apartado 1512 1002 Pase de Estudiantes
San Jose, Costa Rica

Reply and Date: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {3-1}
10/29/2012: Association advised that no companies in Costa Rica produce the subject fabric. {3-2}

Association: *El Salvador's Chamber of Textiles and Apparel (CAMTEX)*
Contact(s): Patricia Figueroa, Executive Director (direccion@camtex.com.sv)
Mauricio Rodriguez, Manager (mrodriguez@camtex.com.sv)
Address: Calle Liverpool y Roma, edificio ASI
San Salvador, El Salvador

Reply and Date: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {4-1}
10/30/2012: Association advised that it will contact its member companies in El Salvador to produce the subject fabric. {4-2}



Association: *Guatemala Apparel and Textile Association (VESTEX)*
Contact(s): Luis Oscar Estrada, Manager (lestrada@apparel.com.gt)
Address: 15 Avenida 14-72 zona 13 2ndo. Nivel
Guatemala, Guatemala C. A 01013

Reply and Date: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {5-1}
11/19/2012: Second request {5-2}
11/21/2012: Association advised that no companies responded to the association's request. {5-3}

Association: *Honduran Manufacturers Association*
Contact(s): Ernesto Interiano, Executive Director (direcciontecnica@ahm-honduras.com)
Angela Castillo (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: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {6-1}
10/31/2012: Association advised that it forwarded the request to its members and if any were interested they would contact VF directly. {6-2}

Association: *National Council of Textile Organizations*
Contact(s): Michael Hubbard, Vice President (mhubbard@ncto.org)
Address: 910 17th Street, NW, Suite 1020
Washington, D.C. 20006

Reply and Date: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {7-1}
11/20/2012: Second request. {7-2}
No response received.

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: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {8-1}
11/20/2012: Second request. {8-2}
No response received.



Association: *Nicaraguan Textile Association (Anitec)*
Contact(s): Dean Garcia, Executive Director (director@anitec.net)
Address: Zona Franca "Las Mercedes" km 12 ½ Carretera Norte, Building #29
Managua, Nicaragua

Reply and Date: 10/29/2012: Initial inquiry regarding members' ability to produce subject fabric. {9-1}
11/20/2012: Second request {9-2}
No response received.

COMPANIES:

Dominican Republic:

Company: *3 MT Enterprises, Inc.*
Contact(s): Sigfrido Elmufdi, Manager (selmufdi@grupo3mt.com)
(fax: 506-2239-0059)
Address: Zona Franca Industrial San Pedro de Macoris
San Pedro de Macoris, Dominican Republic

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {A1}
11/15/2012: Second request. {A2}
No response received.

El Salvador:

Company: *Darlington Fabrics – El Salvador, LTDA. DE C.V.*
Contact(s): Baltazar Quezada (bquezada@dfabrics.com); Renato D. Rosales (rrosales@dfabrics.com) fax: 503-2389-5340
Address: American Industrial Park, Block I, KM. 36 Carretera Santa Ana, Ciudad Arce, El Salvador C.A.

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {B1}
01/09/2013: Second request. {B2}
01/09/2013: Company indicated that it is not able to produce the subject fabric. {B3}

Company: *Industrias Unidas S.A. (IUSA)*
Contact(s): Guillermo Enrique Vila, Sales Manager (ventas@iusa.com.sv)
Address: Km 11.5 Carretera Panamericana
Frente Aduana San Bartolo
San Salvador, El Salvador

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {C1}
11/15/2012: Second request. {C-2}
No response received.



Company: *Pettenati Centro America S.A. de C.V.*
Contact(s): Claudia Villacorta, Customer Service Coordinator Commercial
Department (cvillacorta@pettenati.com.sv)
Address: KM 42 Carretera a Santa Ana
Coatepeque, santa ana, El Salvador

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {D1}
11/15/2012: Second request. {D2}
11/19/2012: Company advised that it could not produce the subject fabric. {D3}

Company: *Poliester y Filamentos de CA, SV de CV*
Contact(s): Julio Nasri Miguel, GM (polifylsa@gmail.com.com.sv)
(fax 001-571-223-2731)
Address: Km 10.5 Carr al Puerto de la Libertad
La Libertad, El Salvador

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {E1}
11/15/2012: Second request. {E2}
No response received.

Company: *Pro Dept El Salvador, SA de CV*
Contact(s): Mario Zavaleta, Manager (mario@prodept.com)
Address: Edif #18 Calle Tazumal
Zona Franca San Bartolo
San Salvador, El Salvador

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {F1}
11/15/2012: Second request. {F2}
11/16/2012: Company advised that it could not produce the subject fabric. {F3}

Guatemala:

Company: *Hilos Y Telas*
Contact(s): Arianne Hage, Export Sales Manager (info@hilosytelas.com)
34 Calle 7-42 Zona 11, Colonia Las Charcas, Guatemala, Guatemala
Address:

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {G1}
11/15/2012: Second request. {G2}
No response received.

Company: *Parkland*
Contact(s): Bryan Quan, General Manager (bquan@parkland.com)
Address: 17 Calle 5-36 Zona 1, Guatemala

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {H1}



11/15/2012: Second request. {H2}
No response received.

Company: *Textisur*
Contact(s): Juan Carlos Castaneda (juancarlos@textisur.com); Guillermo Zimeri
Address: Massis (gzimeri@textisur.com)
Km 18.5 Carr al Mayan Golf
Villa Nueva, Guatemala

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {I1}
10/29/2012: Company requested sample of fabric. {I2}
11/12/2012: VF indicated that they had previously sent a fabric sample during the previous request, which was delivered on May 10, 2012.⁴ {I3}
11/12/2012: Company advised that it could not produce the subject fabric. {I4}

Honduras:

Company: *Confecciones Internacionales SA de CV*
Contact(s): Andres Facusse, General Manager (sales@confecciones.com)
Address: Zona Libre Tegucigalpa
Colonia Kennedy Quinta entrada
Tegucigalpa, Honduras

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {J1}
11/15/2012: Second request. {J2}
11/16/2012: Company advised that it could not produce the subject fabric. {J3}

Company: *Industrias Gabriela S de RL de CV*
Contact(s): Harold Guerrero, General Manager (hguerrero@indgabriela.com)
Address: 200 mts antes de Aldea Mateo
Carretera al 1er Batallon
Tegucigalpa, 11101 Honduras

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {K1}
11/15/2012: Second request. {K2}
11/16/2012: Company advised that it could not produce the subject fabric {K3}

⁴ VF originally contacted suppliers in April 2012 requesting the production of the subject fabric. After contacting the suppliers and after discussions with individuals at the Office of Textile and Apparel, VF refined the technical specifications to include, among other things, tighter tolerances for the performance characteristics of the fabric. Because the specifications were revised, VF began its due diligence efforts anew in October 2012 and contacted each potential supplier to advise them of the revised specifications. The results of these efforts are detailed in this submission.



United States:

Company: *ATD-American Co.*
Contact(s): Wilma Malish, Contract Sales Mgr. (website@atd.com)
Address: 135 Greenwood Ave
Wyncote, PA 19095-1396

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {L1}
11/15/2012: Second request. {L2}
No response received.

Company: *Bender & Associates*
Contact(s): Charles Bender, Owner (bendertex@aol.com)
Address: 505 Northern Blvd
Great Neck, NY 10021

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {M1}
01/08/2013: Second request. {M2}
01/08/2013: Company advised that it could not produce the subject fabric. {M3}

Company: *Brookwood*
Contact(s): Steven Lerman, VP Consumer (steven@brookwoodcos.com)
Address: 25 west 45th Street, 11th Floor, New York, New York 10036

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {N1}
11/02/2012: Company requested target price range for subject fabric. {N2}
11/12/2012: VF indicated that subject fabric is virtually identical to previous fabric. {N3} See note 4, *supra*.
12/14/2012: Company advised that it is not able to produce the subject fabric. {N4}

Company: *Carnegie Textile Co., Ltd.*
Contact(s): Al J. Kay, President (carnegieequipment@sbcglobal.net)
Address: 31100 Solon Rd
Unit D Mailbox #14, Solon, OH 44139

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {O1}
11/15/2012: Second request. {O2}
No response received.

Company: *Eastbank Textiles, LLC*
Contact(s): John B. Fry (info@eastbanktextiles.com)
Address: 776 Baconsfield Dr Bldg 2 Ste 202
PO Box 6174, Macon, GA 31208-6174

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {P1}



11/15/2012: Second request. {P2}
No response received.

Company: *Edit Limited*
Contact(s): Thanos Kamiliotis, CEO (nyc@editlimited.com)
Address: 14 E 38th 6th Fl
New York, NY 10016

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {Q1}
11/15/2012: Second request. {Q2}
No response received.

Company: *EDPA USA, Inc.*
Contact(s): Ahmet Bereket, VP Sales (edpa@edpauusa.com)
Address: 350 5th Ave Ste 5010
New York, NY 10118

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {R1}
11/15/2012: Second request. {R2}
No response received.

Company: *Fox-Rich Textiles, Inc.*
Contact(s): James Reich, President (info@fox-rich.com)
Address: 37 Danbury Rd
Ridgefield, CT 06877

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {S1}
10/29/2012: Company indicated interest and asked if a sample was available. {S2}
11/19/2012: Telephone conversation and email regarding fabric specifications. {S3}
12/05/2012: VF follow up regarding company's ability to source the subject fabric. {S4}
12/06/2012: Company advised that it would not be able to supply the requested fabric. {S5}

Company: *Glen Raven Technical Fabrics, LLC*
Contact(s): Harold W. Hill Jr., Pres /COO (grtfmarketing@glenraven.com)
Address: 1831 N Park Ave., Glen Raven, NC 27217

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {T1}
10/30/2012: Company advised that it could not produce the subject fabric and suggested that VF contact Brookwood and W.L.Gore. {T2} See detailed descriptions of VF's due diligence for Brookwood and W.L. Gore.



Company: *Inman Mills*
Contact(s): Ben Truslow, Vice President Sales (sales@inmanmills.com)
Address: 300 Park Rd
PO Box 207, Inman, SC 29349

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {U1}
10/29/2012: Company advised that it could not produce the subject fabric. {U2}

Company: *Jewel Industries, Inc.*
Contact(s): Woody Carruthers, President (sales@jewelindustries.com)
Address: 354 Riverbend Rd
PO Box 25166, Advance, NC 27006

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {V1}
11/15/2012: Second request. {V2}
11/16/2012: Company advised that it could not produce the subject fabric. {V3}

Company: *Magna Fabrics*
Contact(s): Jerome Fink, VP Sales/Owner (info@magnafabrics.com)
Address: 2600 71 St
North Bergen, NJ 07047-6449

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {W1}
11/15/2012: Second request. {W2}
No response received.

Company: *Milliken & Co.*
Contact(s): Kathi Dutilh, Manager, Government Relations (kdutilh@millikendc.com)
920 Milliken Road, Spartanburg, SC 29304
Address:

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {X1}
11/02/2012: Company requested sample and further information regarding the subject merchandise. {X2}
11/12/2012: VF indicated willingness to supply sample. VF also advised that Kathi Dutilh previously indicated that Milliken could not produce the subject fabric prior to revisions made to tighten the tolerances for the performance criteria. VF requested that Milliken respond if they still needed a fabric sample. {X3}
No response received.



Company: *Osgood Textiles*
Contact(s): Lillian Kahan, Admin Manager (info@osgoodtextile.com)
Address: 333 Park St., West Springfield, MA 01089

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {Y1}
 11/15/2012: Second request. {Y2}
 No response received.

Company: *Philmar Fabrics*
Contact(s): Harvey Drucker, President (hsd@verizon.net)
Address: 158 W 29th St 3rd Fl., New York, NY 10001

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {Z1}
 11/15/2012: Second request. {Z2}
 No response received.

Company: *Phoenix of Anderson*
Contact(s): Greg Cohen, CEO/VP Sales (gregc@phoenixofanderson.com)
Address: 15 Broad St., Williamston, SC 29697

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {AA1}
 10/29/2012: Company indicated that it is not able to produce the subject fabric. {AA2}

Company: *Polartec, LLC*
Contact(s): Marc Webster, Manager New Product Development
 (websterm@polartec.com)
Address: 46 Stafford Street, Lawrence, MA 01841

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {AB1}
 11/15/2012: VF follow up request. {AB2}
 No response received.

Company: *Schneider Mills, Inc.*
Contact(s): Hank Byrd, President (fax 828-6329834)
Address: Hwy 16 N, PO Box 519, Taylorsville, NC 28681

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {AC1}
 10/29/2012: Company indicated that they could not supply subject fabric, but that VF should contact its customer, Brookwood. {AC2}
 See above and Exhibit N for a detailed description of VF's due diligence discussions with Brookwood.

Company: *Textile Arts Marketing, Inc.*
Contact(s): Ken Noonan, Managing Director (info@textileartsmarketing.com)
Address: 405 Tarrytown Rd Ste 1558, White Plains, NY 10607

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject



fabric. {AD1}

11/16/2012: Second request. {AD2}

No response received.

Company: *Twiss Associates, Inc.*
Contact(s): Gary Reckson, National Sales Manager (twiss02@mindspring.com)
Address: 19 Compo Rd S, Westport, CT 06880

Reply and Date: 10/29/2012: Initial inquiry regarding company's ability to produce subject fabric. {AE1}
 11/01/2012: Company indicated that it could not supply the subject fabric. {AE2}

Company: *W.L. Gore and Associates*
Contact(s): Ian Pund , Account Manager (ipund@wlgore.com)
Address: 555 Paper Mill Road, Newark, Delaware 19711

Reply and Date: 12/20/2012: Initial inquiry regarding company's ability to produce subject fabric. {AF1}
 12/20/2012: Company indicated that it was not interested in supplying the subject fabric. {AF2}

(ii) Identification of CAFTA-DR suppliers

The list of potential suppliers was compiled through: (1) the 2011 Davison's Textile Salesman's Blue Book, (2) through the contact mechanisms of U.S. and Central American textile and apparel trade associations, and (3) VF's experience sourcing product in the U.S. and DR-CAFTA region.

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



(v) *Provision of Samples*

As noted above, in the course of the business dialogue, VF provided physical samples to several potential suppliers.⁵ No potential suppliers indicated that they could produce the requested fabric.

(vi) *Substitutability of Products*

No company suggested any fabrics that were substitutable for the subject fabric.

(4) Substitutable Products

VF, and its related brands, including The North Face, provide high-quality performance apparel and outerwear to its customers. The subject fabric is used for performance outerwear and its specifications are designed to withstand prolonged use in extreme conditions.

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

VF is unaware of any supplier that produces a substitutable product in the CAFTA-DR countries, and did not receive an assertion that a conforming fabric could be produced that was substitutable for the fabrics requested.

As a result of the above inquiries and the thorough engagement and good faith efforts to procure the subject fabric, neither VF nor ST&R believe that the subject fabric is commercially available in the CAFTA-DR region in a timely manner and we request that it be added to Annex 3.25.

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, Esq.
Nicole Bivens Collinson, President
International Trade and Government
Relations

⁵ As noted above, VF provided samples earlier in 2012 to several potential suppliers that requested samples in connection with VF's original due diligence.

ANNEX

Detailed Fabric Description			
Fabric:	Composite Fabric consisting of a 3-layered fleece/shell construction, woven outer layer and brushed inner layer, bonded with a polyurethane (PU) membrane		
	Woven Face Fabric	Circular Double Knit Fleece Back Pile Fabric	Composite Fabric
Fiber Content	83.5% to 88.5% Polyester 13.3% to 14.7% Spandex	100% Polyester	N/A
Yarn Size (single ply, warp and filling)	Textured Polyester: 80.9 to 85.8 decitex/144 Filament (116.5 to 123.6 Nm/144 Filament) (72.8 to 77.3 denier/144 Filament) Spandex: 43.1 to 45.7 decitex (218.4 to 231.8 Nm) (38.8 to 41.2 denier)	80.9 to 85.8 decitex (72.8 to 77.3 Denier) (116.5 to 123.6 Nm)	N/A
Thread Count:	44.9-49.6 warp ends per cm ² by 35.2-41.3 filling picks per cm ²		N/A
Weave Type:	Plain Weave	Circular Double Knit Looped Pile	N/A
Weight:	118.1 to 130.2 g/m ² (3.5 to 3.9 oz./yd ²)	157.1 to 173.2 g/m ² (4.6 to 5.1 oz./yd ²)	333.3 to 367.5 g/m ² (9.8 to 10.8 oz./yd ²)
Width:	N/A	N/A	130 cm wide (51.18 inches)
Finish:	Woven Face: Piece Dyed and/or Printed. Woven Back: Piece Dyed. Knit Face: Piece Dyed. Knit Back: Piece Dyed. Full contact bonding.		
Properties (Composite Fabric):	Windproof (ASTM D737 – Initial ≤ 1.0 cfm – 3x Wash ≤ 1.0 cfm), Durable Water Resistant (AATCC 22 – Initial ≥ 90 Points – 10x Wash ≥ 70 Points), High Light Fastness (AATCC 16 Opt 3 – Class 3.0 @ 40 Hours AFU), Low Range Hydrostatic (JIS1092 – Initial 20,000 mm – 3x Wash 20,000 mm; AATCC127 – Initial 20,000 mm – 3x Wash 20,000 mm); Water Vapour Permeability (JIS 1099 – Initial 20,000 g/m ² /24hr – 3x Wash 20,000 g/m ² /24hr); Water Vapour Transmission (ASTM E96 B – Initial 500 g/m ² /24hr – 3x Wash 500 g/m ² /24hr)		
HTSUS Subheading:	6001.22.		
Remarks:	<p>Ranges above allow for a variance of up to five percent for fabric weight, thread count and three percent for fiber content and Yarn Size.</p> <p>NOTE: The yarn size designations describe a range of yarn specifications for yarn before knitting, dyeing and finishing of the fabric. They are intended as specifications to be followed by the mill in sourcing yarn used to produce the fabric. Dyeing, finishing, and knitting can alter the characteristic of the yarn as it appears in the finished fabric.</p>		

	<p>This specification therefore includes yarns appearing in the finished fabric as finer or coarser than the designated yarn sizes provided that the variation occurs after processing of the greige yarn and production of the fabric. The specifications for the fabric apply to the fabric itself prior to cutting and sewing of the finished garment. Such processing may alter the measurements.</p>
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ATTACHMENT

(CONFIDENTIAL VERSION ONLY)

Confidential version contains copies of VF's confidential request letters and confidential responses, as described in the foregoing letter.

DUE DILIGENCE CERTIFICATION

I, Mark Tallo, of Sandler, Travis & Rosenberg, P.A., counsel to VF Corp., certify that:

- (1) I have read the attached submission, and
- (2) Based upon the information made available to me by Michelle Jean Landgrebe, I have no reason to believe that this submission contains any material misrepresentation or omission of fact.



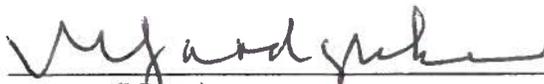
Mark Tallo

Date: January 15, 2013

Due Diligence Certification

I, Michelle Landgrebe, VP/GMM VFSLA, currently employed by VF Corp., certify that I:

- 1.) have read the attached submission, and
- 2.) the information contained in this submission is, to the best of my knowledge, complete and accurate.

Signed: 
(Name)

Date: 1/14/13