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September 19, 2007

VIA OVERNIGHT DELIVERY

PUBLIC
VERSION

Mr. R. Matthew Priest
Chairman, Committee for the Implementation of
Textile Agreements – Room H3100
U.S. Department of Commerce
14th and Constitution Avenue, NW
Washington, DC 20230

Re: Commercial Availability Request
Three-thread circular knit fleece fabrics, classifiable at 6001.21.000,
HTSUS

Dear Mr. Priest:

On behalf of Perry Manufacturing Company (“Perry Manufacturing”), 100 Woltz Street, PO Box 1027, Mount Airy, North Carolina 27030, and pursuant to Section 203(o)(4) of the Dominican Republic-Central America-United States Free Trade Agreement (“CAFTA-DR”) Implementation Act and the Committee for Implementation of Textile Agreements (“CITA”) Final Procedures¹ for submitting Commercial Availability Requests, we request that two three-thread circular knit fleece fabrics, classifiable at 6001.21.000, Harmonized Tariff Schedule of the United States (“HTSUS”), be added to the Short Supply List at U.S. Note 20(a) to Chapter 98, Subchapter XXII, HTSUS (“the Short Supply List”).

I. Detailed Product Information

The subjects of this request are two three-thread circular knit fleece fabrics. These fabrics are classified at 6001.21.0000, HTSUS, as “Pile fabrics . . . knitted or crocheted: Looped pile fabrics: Of cotton.” These fabrics are used in the production of

¹Final Procedures for Considering Requests Under the Commercial Availability Provision of the Dominican Republic-Central America-United States Free Trade Agreement, Comm. for the Implementation of Textile Agreements, 72 Fed.Reg. 13,256 (Mar. 15, 2007).

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
404-881-7000
Fax: 404-881-7777

Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
704-444-1000
Fax: 704-444-1111

90 Park Avenue
New York, NY 10016
212-210-9400
Fax: 212-210-9444

3201 Beechleaf Court, Suite 600
Raleigh, NC 27604-1062
919-862-2200
Fax: 919-862-2260

men's and women's casual knit sportswear, including crew-neck pullovers, zip-front hooded jackets, and elastic-waist and drawstring-waist pull-on pants. The fabric specifications for each of the two fabrics follow:

First Fabric Formulation

<i>Fiber content</i>	72 to 78 percent cotton, 22 to 28 percent polyester
<i>Yarn</i>	<ul style="list-style-type: none"> • Face Yarn <ul style="list-style-type: none"> ○ Metric: single ply, ring spun cotton of metric yarn numbers 41 to 48 ○ English: single ply, ring spun cotton of English yarn numbers 24 to 28 • Tie Yarn: <ul style="list-style-type: none"> ○ Metric: polyester filament of 49 to 51 denier • Fleece Yarn <ul style="list-style-type: none"> ○ Metric: single ply staple of 57 to 63 percent cotton and 37 to 43 percent polyester of metric yarn numbers 24 to 30 ○ English: single ply staple of 57 to 63 percent cotton and 37 to 43 percent polyester of English yarn numbers 14 to 18
<i>Gauge</i>	20 to 24
<i>Knit type</i>	Three-thread circular knit
<i>Weight</i>	<p>Metric: 285 to 330 grams per square meter</p> <p>English: 8.42 to 9.75 ounces per square yard</p>
<i>Width</i>	<p>Metric: 172 to 183 centimeters</p> <p>English: 68 to 72 inches</p>

<i>Finish</i>	Napped on the technical back; bleached, yarn dyed, or piece dyed
<i>Performance Criteria</i>	Not more than 5 percent vertical and horizontal shrinkage and not more than 4 percent vertical torque

Second Fabric Formulation

<i>Fiber content</i>	77 to 83 percent cotton, 17 to 23 percent polyester
<i>Yarn</i>	<ul style="list-style-type: none"> • Face Yarn <ul style="list-style-type: none"> ○ Metric: single ply, ring spun cotton of metric yarn numbers 47 to 54 ○ English: single ply, ring spun cotton of English yarn numbers 28 to 32 • Tie Yarn: <ul style="list-style-type: none"> ○ Metric: polyester filament of 49 to 51 denier • Fleece Yarn <ul style="list-style-type: none"> ○ Metric: single ply staple of 67 to 73 percent cotton and 27 to 33 percent polyester of metric yarn numbers 24 to 30 ○ English: single ply staple of 67 to 73 percent cotton and 27 to 33 percent polyester of English yarn numbers 14 to 18
<i>Gauge</i>	20 to 24
<i>Knit type</i>	Three-thread circular knit
<i>Weight</i>	<p>Metric: 266 to 308 grams per square meter</p> <p>English: 7.85 to 9.08 ounces per square yard</p>

<i>Width</i>	Metric: 146 to 183 centimeters English: 58 to 72 inches
<i>Finish</i>	Napped on the technical back; bleached, yarn dyed, or piece dyed
<i>Performance Criteria</i>	Not more than 5 percent vertical and horizontal shrinkage and not more than 4 percent vertical torque

Four samples of fabrics falling within these specifications are enclosed with this letter. Two samples have the characteristics described above in the first fabric formulation, which Perry Manufacturing uses to make men's apparel. One of these is yarn dyed; the other is piece dyed. The third and fourth samples have the characteristics described above in the second fabric formulation, which Perry Manufacturing uses to make women's apparel. One of these is yarn dyed; one is piece dyed.

II. Quantity

Perry Manufacturing will require delivery of these fabrics within six to eight weeks of issuance and acceptance of an initial purchase order. Perry Manufacturing expects this initial purchase order and the subsequent purchase orders to cover 150,000 yards (137,160 meters) of fabric per week for 15 to 20 weeks, for a total of 2,250,000 to 3,000,000 yards (2,057,400 to 2,743,200 meters) of fabric, including equal quantities of both fabric formulations.

III. Due Diligence

In performing the due diligence requirements of CITA's Interim Procedures, Perry Manufacturing identified potential suppliers of these two fabrics by consulting Davison's Textile Blue Book online, <http://www.davisonbluebook.com/textilebluebook>, and by researching companies listed as potential suppliers in other commercial availability petitions filed under CAFTA-DR. Perry Manufacturing also consulted trade associations from the various CAFTA-DR countries.

Perry Manufacturing contacted these companies and trade associations via email where email addresses were available and by facsimile where email addresses were not working or were unavailable. Perry Manufacturing originally sent its request to these companies on July 26.² On August 17, Perry Manufacturing made a second attempt to contact all companies that had not responded to its original request. More detailed

² Some of the companies contacted by Perry Manufacturing helped Perry Manufacturing to identify additional potential suppliers. When companies originally were contacted after July 26, the first date of contact is noted in the table of responses.

descriptions of Perry Manufacturing's attempt to contact potential suppliers and those companies' responses are included in the table below.

Additionally, copies of all correspondence relative to Perry Manufacturing's search, including an example of its Request Letter, an example of its blank Response Form, copies of memoranda confirming telephone conversations, and copies of all completed responses returned to Perry Manufacturing, are attached. (Attachment A). We request confidential treatment of all attachments.

Sources Contacted	Response
Sources in the United States	
Alamac American Knits Ron Giacone ron.giacone@alamacusa.com	Ron Giacone responded via email on July 31 that Alamac cannot supply the requested fabric.
Alice Manufacturing Co. Brad Wurst bwurst@alicemillsinc.com	We sent our solicitation to this company on July 31. We sent a second copy of our request letter via email on August 17. We received no response.
Antex Knitting Mills Bill Tennenblatt, Manager Fax: (323) 233-7751	We sent our solicitation to this company on August 21. We received no response.
Central Textiles, Inc. William C. Steen Fax: (864) 639-2491	We sent our solicitation to this company via fax on July 31 and sent a second letter via fax on August 17. The August 17 fax failed, and we received no response to our earlier inquiries.
Clover Knits, Inc. Kevin McCarter, President kevin@cloverknits.com	We sent our solicitation to this company on August 21. We received no response.
Global Engineered Materials Corp. Bruce Hauser bhauser31@aol.com	We sent a second copy of our request letter via email on August 17. We received no response.
Hamrick Mills, Inc. Sir or Madam semmerth@hamrickmills.com	We sent our solicitation to this company on July 31. Our email transmission failed. On July 31, we sent our request via fax to (864) 487-9940. This transmission also failed. We attempted five additional times to send the request letter via fax on August 17, but all attempts failed.
Inman Mills George A. Abbott sales@inmanmills.com	We sent our solicitation to this company on July 31. We sent a second copy of our request letter via email on August 17. We received no response.
International Textile Group Frank Bakirdan, Vice President of Sales info@itg-global.com	Delores Sides responded via email on July 26 that the company does not produce circular knit fabrics and cannot supply the requested fabrics.

<p>LJ Knit Sales Jay Steinberg jaysteinbergmsv@comcast.net</p>	<p>Jay Steinberg responded via email on July 26 that he did not know of any U.S. knitting mill that could supply the requested fabric, although he suggested we contact Monarch Knitting to confirm. We researched Monarch Knitting and learned that it also manufactures machinery for knitting, not knit fabric.</p>
<p>Milliken & Co. Kathi Dutilh kdutilh@millikendc.com</p>	<p>Kathi Dutilh responded via email on July 27 that the company is not making fleece at this time.</p>
<p>MoCaro Group Harry C. Spell sales@mocarogroup.com</p>	<p>We sent our solicitation to this company on August 21. We received no response.</p>
<p>National Spinning Co., Inc. Jim Booterbaugh jimbo@natspin.com</p>	<p>Bob Miller contacted us after receiving our request letter from NCTO, but we confirmed in subsequent correspondence with Jim Booterbaugh that the company does not make woven fabric. We contacted the weavers the Mr. Booterbaugh suggested.</p>
<p>New River Industries (t/a Texfi Industries) Cindy Pittman cpittman@nrindustries.com</p>	<p>We sent a second copy of our request letter via email on August 17. We received no response.</p>
<p>Professional Knitting, Inc. Mike McCarter, President Fax: (803) 222-1503</p>	<p>We sent our solicitation to this company on August 21. We received no response.</p>
<p>Schneider Mills, Inc. George Shtohryn, Senior Vice President schmills@bellatlantic.net</p>	<p>George Shtohryn confirmed via telephone on August 6 that his company only produces woven fabric.</p>
<p>Vanguard Supreme Todd Diggs, International Sales Manager tdiggs@vanguardsupreme.com</p>	<p>We sent a second copy of our request letter via email on August 17. Brian Driggars responded on August 17 that the company produces knitting machines (not knit fabrics).</p>
<p>National Coalition of Textile Organizations Michael Hubbard mhubbard@ncto.org</p>	<p>We sent a second copy of our request letter via email on August 17. Mike Hubbard responded on August 17 that he had circulated the request to the organization's membership, and he provided names of additional companies we might contact. If we had not already contacted them and could locate contact information, we followed this suggestion.</p>
<p>American Manufacturing Trade Action Coalition Augustine Tantillo, Executive Director</p>	<p>We sent a second copy of our request letter via email on August 17. We received no response.</p>

atantillo@amtacdc.org	
National Textile Association David Trumbull, Director, Member Services dtrumbull@nationaltextile.org	We sent a second copy of our request letter via email on August 17. We received no response.
American Apparel Producers' Network Mike Todaro, Managing Director miketodaro@mindspring.com	Sue Strickland responded on August 21 that she had circulated our request to the organization's membership. We received no further response.
Sources from Guatemala	
Alcatextil Ana Santos shkim@alcatextil.com Amtex Guatemala, S.A. Adrian Hernandez Adrian@prideguatemala.com	We sent a second copy of our request letter via email on August 17. We received no response.
Broadcloth Roberto Gonzalez textil@guate.net	We sent a second copy of our request letter via email on August 17. Our attempt to transmit the second request failed.
Confecciones Anice / Conamsa Munir Massis muinir@terra.com.gt	Our attempts to email this company on July 26 and August 17 failed. We corrected an apparent error in the email address and attempted again on September 13 to contact the company via email, but that transmission failed as well. Also on September 13, we attempted twice to fax our request to 502-6634-1863, but both fax transmissions failed.
Empresa Industrial Cantel Pablo Garcia Salas pablogs@itelgua.com	We sent a second copy of our request letter via email on August 17. We received no response.
Fabrica De Tejidos Samira Munir Massis tejisamira@turbonett.com	We sent a second copy of our request letter via email on August 17. We received no response.
Fabrica La Roca Alejandro Arnau nrivera@flaroca.com	We sent a second copy of our request letter via email on August 17. We received no response.
Fabrica De Tejidos Iris Ligia Maria Illescas texmosairis@citel.com.gt	We sent a second copy of our request letter via email on August 17. We received no response.
FSTex, S.A. Hans W. Schieber fstexsa@gmail.com	Hans Schieber responded via email on July 30 that FSTex does not produce the requested fabric.
Grupo Imperial Robert Zaid	We sent a second copy of our request letter via email on August 17. We received no response.

textiles@imperialtex.com	
Hilos y Telas, S.A. Roberto Antonio Malouf ramalouf@hilosytelas.com	We sent a second copy of our request letter via email on August 17. We received no response.
ICITEX Guillermo Zaid ribbons@tejidospolitex.com	We sent a second copy of our request letter via email on August 17. We received no response.
Jung Woo Textiles Ines Lee jungwoo@jungwootextile.com	We sent a second copy of our request letter via email on August 17. We received no response.
Kum'Otex Guatemala Young Kyu Park ykpark@kumotex.co.kr	We sent a second copy of our request letter via email on August 17. We received no response.
Manufacturas Textiles Perfecta Enrique Zimeri Gándara textiles@textilesperfecta.com	We sent a second copy of our request letter via email on August 17. We received no response.
Mayotex Raymond Zaid rzaid@turbonett.com	We sent a second copy of our request letter via email on August 17. We received no response.
Megatextil's Sung Deok Kim megatextiles@hanmail.net	We sent a second copy of our request letter via email on August 17. We received no response.
Modas Alpha / World Fama (II) Hak Rae Kim Kim alphatextil@intelnett.com	Our attempt to transmit our request letter via email failed. On July 31, we attempted to send our request via fax to (502) 7882-7357. This transmission also failed. We attempted again to send the request letter via fax on August 17. This fax transmission succeeded but we received no response.
Modas Amor Chang Ok Yoo changoky@hanmail.net	We sent a second copy of our request letter via email on August 17. We received no response.
Modas Han Kil Chang Ok Yoo mkeo728@hanmail.net	We sent a second copy of our request letter via email on August 17. We received no response.
Monte Textil S.A. Juan Carlos Castaneda, Export Manager juancarlos@textisur.com	We sent a second copy of our request letter via email on August 17. Juan Carlos Castaneda responded on August 20 that the company cannot produce fleece fabrics.
Parktland Bryan Quan parktland@apparel.com.gt	J.Y. Yoon met on behalf of Perry Manufacturing on September 12 with Bryan Quan. Mr. Quan informed Mr. Yoon that he planned to use Selim's knitting facility and dyer in order to produce the requested fabrics. On September 18, Young-jong Han of Selim clarified that it is not capable of production of

	and lacks the capacity to produce the requested fabrics.
Parracana Raul Ibarguen Pujol parracanacantel@yahoo.com	Our attempt to email the letter failed. On July 31, we emailed the letter to Abigail Gomez at aby@itelgua.com. We sent a second copy of our request letter to that email address on August 17. We received no response.
Rosazu Francisco Goenz francisco.goenz@imerlet.com	We sent a second copy of our request letter via email on August 17. We received no response.
Selim Guatemala, S.A. Young-jong Han jlpereac@hotmail.com	Young-jong Han stated in an email on September 18 that the company is not capable of production of and does not have the capacity to produce the requested fabrics.
Supra Textiles Raul Ibarguen, General Manager rigs@itelgua.com	We sent a second copy of our request letter via email on August 17. We received no response.
Textiles Amatitlan, S.A., aka Industrias Liztex José Habie textil@liztex.com	Liztex responded on July 30 that the company was unable to view the request letter in our email attachment. We resent the letter on July 31 and Liztex confirmed receipt on the same date. We sent a third copy of our request letter via email on August 17. We received no further response, but we note that, in recent inquiries by Garan Manufacturing, the company responded that the company does not make three-end fleece.
Tejidos Berlin Horst Wandel Raiser berlin@terra.com.gt	The attempt to email the request letter failed. On July 31, we attempted to email the letter to berlin@terra.gt. This transmission also failed. On August 2, we successfully faxed the letter to (502) 2434-7141, and we sent a second fax on August 17, but we received no further response.
Tejidos Mundiales Stefan Meany tejidos_mundiales@hilosytelas.com	We sent a second copy of our request letter via email on August 17. We received no response.
Textiles Parabolica (TEXPASA) Rene Castaneda rcastaneda@texpasa.com	We sent a second copy of our request letter via email on August 17. We received no response.
Viva Mundo Textil Soo Joong Kang vivamundotextil@hotmail.com	We sent a second copy of our request letter via email on August 17. We received no response.

Textilera Santa Emilia Alberto Zimeri Gandara; textiles@textilesperfecta.com	We sent a second copy of our request letter via email on August 17. We received no response.
Textiles Capuano/ Textiles Catania Alejandro Ortega aob@textilescapuano.com	We sent a second copy of our request letter via email on August 17. We received no response.
Textiles Del Pacifico Rene Castaneda rcastaneda@texpasa.com	We sent a second copy of our request letter via email on August 17. We received no response.
Textiles Modernos Ligia Maria Illescas texmosairis@citel.com.gt	We sent a second copy of our request letter via email on August 17. We received no response.
Guatemala Apparel and Textile Industry Commission (Vestex) Liggia Barrios, Promotion and Marketing lbarrios@apparel.com.gt	We sent a second copy of our request letter via email on August 17. We received no response.
Sources from Nicaragua	
The Nicaraguan Apparel & Textile Manufacturers Association (Anitec) Carlos Sandino, President nicaind@aol.com	We sent a second copy of our request letter via email on August 17. We received no response.
Knitwear S.A. Manely Argenal marginal@knitwear.com	Because it is a garment producer, we did not initially send our request to the company, but Manely Argenal learned of our request through AAPN and contacted us. Mr. Argenal confirmed via email on August 8, however, that the company does not produce fabric.
Sources from El Salvador	
Duraflex-Politex Edwin Zamora edwinz@duraflex-poliotex.com	We sent a second copy of our request letter via email on August 17. This transmission failed, and we received no further response.
Industrias Sinteticas de C.A.S.A. Maki Uchida, Manager of Sales insinca@insinca.com	We sent a second copy of our request letter via email on August 17. We received no response.
Industrias Unidas, S.A. Guillermo Enrique Vila Schlesinger guillermo.vila@iusa.com.sv	We sent a second copy of our request letter via email on August 17. We received no response.
Martinez y Saprissa, S.A. de	We sent a second copy of our request letter via email

<p>C.V. (MARYSA) Luis Sera Escartin, General Manager ventasmarysa@integra.com.sv</p>	<p>on August 17. We received no response.</p>
<p>Mauricio Arturo Orellana Equizabel Mauricio Artura Orellana, General Manager confecsa@hotmail.com</p>	<p>We sent a second copy of our request letter via email on August 17. We received no response.</p>
<p>Pro Dept El Salvador, S.A. de C.V. Mario Zavaleta, Manager Mario@prodept.com.sv</p>	<p>Our attempts on July 26 and August 17 to contact this company via email failed. On September 13, we successfully sent our request via fax, but we received no response.</p>
<p>Texsal, S.A. de C.V. Miguel A. Diaz, Admin. Manager migueltexal@navegante.com.sv</p>	<p>Miguel Diaz confirmed via email on August 8 that the company makes elastic, draw cord, and twill tape but cannot supply the requested fabrics.</p>
<p>Union de Industriales Textiles (Unitex) Ingrid Burgos, Executive Director Unitex_gg@telesal.net</p>	<p>We sent a second copy of our request letter via email on August 17. We received no response.</p>
<p>Sources from Honduras</p>	
<p>AKH Tem McInville temm@anvilknitwear.com</p>	<p>We sent a second copy of our request letter via email on August 17. We received no response.</p>
<p>Bang San Honduras, S. de R.L. Hyune Jung Yoon, Manager bangsan@bsh.123.hn</p>	<p>We sent a second copy of our request letter via email on August 17. We received no response.</p>
<p>Caracol Knits Erick Rodriguez erodriguez@caracolknits.com</p>	<p>The attempt to transmit the letter via email failed. On July 31, we sent our request via email to azelaya@caracolknits.com. This transmission failed. Also on July 31, we sent our request letter via fax to (504) 507-1201. This transmission failed as well. We sent a fourth copy of our request letter via email to azelaya@caracolknits.com on August 17. This transmission also failed.</p>
<p>Coral Knits Gerson Fajardo gtorre@coralknits.com</p>	<p>We sent a second copy of our request letter via email on August 17. We received no response.</p>
<p>Confecciones Internacionales S.A. de C.V. Aida Ramos, Product</p>	<p>The attempt to transmit the letter via email failed. On July 31, we sent the request letter to sales@confecciones.hn. We sent a third copy of our</p>

Development Manager aramos@confecciones.hn	request letter to that email address on August 17. We received no response.
Cotton Wise Textiles de Honduras Chang Won Kim, General Manager cottonwise@cottonwise.com	The attempt to transmit the letter via email failed. On July 31, we sent the letter to cottonwisehn@cottonwise.com. This transmission also failed. On July 31, we faxed the letter to (504) 554-0882. This transmission also failed. We sent a fourth copy of our request letter via email on August 17. The transmission succeeded but we received no response.
Elcatex Jesus Canahuati chuy@elcatex.com	We sent a second copy of our request letter via email on August 17. We received no response.
Gildan Activewear Honduras Textile Company Antonio Hepburn ahepburn@gildan.com	We sent a second copy of our request letter via email on August 17. We received no response.
Industrias Continental Roberto Diban Canahuati rdibaninco@sigmanet.hn	We sent a second copy of our request letter via email on August 17. We received no response.
RLA Manufacturing, S. de R.L. Philip Holloway Garciaedy@russellcorp.com	We sent a second copy of our request letter via email on August 17. We received no response.
Shin Sung Honduras Jeong Yang Gi jose@shinsung.hn	We sent a second copy of our request letter via email on August 17. We received no response.
Sky Textile Honduras, S.A. Ken Tai ken_tai@oceanskyintl.com	We sent a second copy of our request letter via email on August 17. We received no response.
Textiles Rio Lindo Karen I. Facusse, Manager kfacusse@riolindo.hn	Karen Facusse responded via email on July 26 that the company does not produce knit fabrics and cannot produce the requested fabrics at this time.
Woon Chun Honduras, S.A. de C.V. Dong Su Sin padrino@woongchun.com	We sent a second copy of our request letter via email on August 17. We received no response.
Yangtex, S.A. Fernando Yang, Manager fernando@yangtex.com.hn	We sent our solicitation to this company on August 21. On the same date, Fernando Yang confirmed receipt of our email; he asked Dunia Fernandez, by copy on the email, to investigate and respond. We received no further response.
Honduran Manufacturers Association	We sent a second copy of our request letter via email on August 17. We received no response.

Angela Castillo, Promotion promocion@ahm-honduras.com	
Sources from Dominican Republic	
3 MT Enterprises Juan A. Elmufdi jelmufdi@grupo3mt.com	We sent a second copy of our request letter via email on August 17. We received no response.
VF Playwear Dominicana, S.A. Rosa Rodriguez, Plant Mgr. info@interknetbs.com.do	We sent a second copy of our request letter via email on August 17. This transmission failed and we received no further response.
Adozona José M. Torres adozona@codetel.net.do	We sent a second copy of our request letter via email on August 17. We received no response.

The information above and the supporting documentation at Attachment A demonstrate that the existing CAFTA-DR industry is unable to provide the fabrics requested in the quantities required and within the given time restraints.

IV. Substitutable Products

Perry Manufacturing is unaware of any suitable substitute for the three-thread circular knit fleece fabrics that are the subject of this request. In particular, two-thread fleece fabrics are not substitutable for three-thread fleece fabrics, because three-thread fleece fabrics incorporate a middle layer of tie yarn that produces less transparent fabrics with more loft. Three-thread fleece fabrics are therefore unlike two-thread fleece fabrics. Perry Manufacturing's customers demand fabrics with these characteristics, which are unique to three-thread circular knit fleece fabrics.

V. Conclusion

In conclusion, the foregoing establishes that the three-thread circular knit fleece fabrics that Perry Manufacturing seeks cannot be formed and finished in CAFTA-DR countries with yarn formed in CAFTA-DR countries and provided to Perry Manufacturing in commercial quantities in a timely manner. Accordingly, we request that CITA add these two fabrics to the Short Supply List in accordance with Section 203(o)(4) of the CAFTA-DR Implementation Act.

Thank you in advance for your thoughtful consideration of this matter. If CITA is in need of any additional information regarding this request, please contact Jon Fee at

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PUBLIC VERSION

(202) 756-3387 or jon.fee@alston.com, or BJ Shannon at (202) 756-3344 or bj.shannon@alston.com.

Sincerely,

/s/ BJ Shannon

BJ Shannon

Attachments

cc: Mr. Jonathan M. Fee, Alston & Bird LLP

LEGAL02/30508656v1

INTERESTED ENTITY'S DUE DILIGENCE CERTIFICATION

I, William K. Woltz, Jr., Chief Executive Officer, Perry Manufacturing Company, certify that:

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

Signed: /s/ William K. Woltz, Jr.
William K. Woltz, Jr.

Date: 9/19/07

LEGAL COUNSEL'S DUE DILIGENCE CERTIFICATION

I, Jonathan M. Fee, of Alston & Bird LLP, counsel to Perry Manufacturing Company, certify that:

1. I have read the attached submission.
2. Based on the information made available to me by William K. Woltz III, I have no reason to believe that this submission contains any material misrepresentation or omission of fact.

Signed: /s/ Jonathan M. Fee
Jonathan M. Fee

Date: 9/19/07

ATTACHMENT A

CONFIDENTIAL

Contents: Copies of Perry Manufacturing's Request Letter and blank Response Form, and copies of responses to Perry Manufacturing, as described in the foregoing letter.