

MAR 17 2010

Deputy Assistant Secretary Kim Glas, Chair
Committee for the Implementation of Textile Agreements (CITA)
Room 3001
U.S. Department of Commerce
14th and Constitution Ave., NW
Washington, DC 20230

March 17, 2010

Dear Ms. Glas:

This comment is filed on behalf of the American Fiber Manufacturers Association (AFMA) in response to the February 2, 2010 Federal Register Request for Public Comment on a Commercial Availability Request Under the U.S.-Singapore Free Trade Agreement (75 FR 6169). The request from the Government of Singapore for consultations under Article 3.18.4(a)(j) of the USSFTA lists 21 general types of fabric with further specifications that expand to a long list of highly specific products.

AFMA would like to place on record its strong support of the comments filed in this proceeding by the National Council of Textile Associations (NCTO); the National Textile Association (NTA); and the American Manufacturing Trade Action Coalition (AMTAC). Each of these associations represent fabric-producing members in the customer base of U.S. fiber producers represented by AFMA.

In addition, we offer the following comments for use by the Committee in its review of the commercial availability request in question:

Specifying “Recycled Polyester” for the Fabrics Petitioned is Inappropriate

The Government of Singapore request limits the fiber specified for many of the fabrics contained in its list to “recycled polyester” (so designated in *footnote 1*). At the imported end product stage, where customs administration is the relevant process, there is no way to distinguish recycled from virgin fiber in the goods submitted for entry.

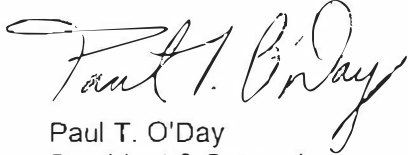
In addition, polyester fiber produced from recycled material is widely available in the U.S. market, so no justification exists on availability grounds to target this particular fiber form as relevant to a commercial availability determination.

U.S. Manufactured Fiber Capacity is Sufficient to Support Domestic Production of the Petitioned Fabrics

The American manufactured fiber production base contains adequate capacity, range of product, and flexibility to meet fabric-producer customer demands in the U.S. for the relevant fabrics on the Government of Singapore’s extensive list. The rayon and soy fibers specified are not produced in the U.S. and accordingly are domestic supply exceptions, but they are available to U.S. fabric producers under standard short supply exemptions to all free trade agreement origin rules.

AFMA would be pleased to elaborate on any of these comments, or provide any other manufactured fiber-related information useful to the Committee in its review of this request from the Government of Singapore.

Respectfully submitted,

A handwritten signature in black ink, reading "Paul T. O'Day". The signature is written in a cursive style with a large, looping initial "P".

Paul T. O'Day
President & Counsel
American Fiber Manufacturers Association