



June 21, 2017

Chairman
Committee for the Implementation of Textile Agreements (CITA)
Room 30003
U.S. Department of Commerce
Washington DC 20230

Re: Request from Government of Bahrain for Modification of Rules of Origin-
United States- Bahrain Free Trade Agreement (USBFTA)- March 23, 2017

Dear Ladies and Gentlemen:

Mount Vernon Mills, Inc. ("Mount Vernon") wishes to submit comments in response to the March 23, 2017 request from the government of Bahrain for modifications under USBFTA to rules of origin for certain knit and woven apparel made from certain knit and woven fabric. Based on the request, CITA is asking for public comment on the ability of the U.S. domestic industry to supply these fabrics in commercial quantities in a timely manner. Mount Vernon desires to respond with respect to six (6) of the fabrics listed in the government of Bahrain request, as shown below. Mount Vernon has the current ability to make five of these fabrics internally in the U.S., and with help of other U.S. textile facilities, can make the sixth one domestically. In all cases, our ability to make and provide these fabrics would be subject to requested delivery deadlines, order size, credit review, pricing, and other special requests the customer may make.

Mount Vernon is a diversified and integrated manufacturer of a wide variety of textile products, including woven fabrics for apparel. The company employs about 2,400 people, and has textile manufacturing locations in four Southeastern states in the U.S. The company has been continuously in operation since the mid-1850s. Further information on our capabilities is available upon request.

Our specific comments by fabric listed:

Category of End Use: Men's or boy's suits, ensembles, suit-type jackets, blazers, trousers, etc. and women's and girl's suits, ensembles, suit-type jackets, blazers, etc.:

Fabric 6- Woven indigo dyed fabric of cotton (95-100%) and elastomeric (0-5%), classified in HTSUS 5208.39.6090 and 5208.39.8090. Mount Vernon is the largest maker of denim fabric in the United States, produced at our denim mill in Trion, Georgia. We make considerable quantities of cotton/elastomeric fabric at this blend level, although primarily at yarn counts coarser than those specified in the HTS codes referenced. But we can certainly make the fabric described here. We would also note that we sell a great deal of our cotton/elastomeric blend denim fabric to a variety of customers to be cut and sewn into jeans in Mexico and Central America and returned to the U.S. for retail sale. If Bahrain is allowed to change the rule of origin here, this entire supply chain would be adversely affected. We further would note that the fabric as described in the request could be a 100% cotton fabric, which would affect another significant portion of our business.

Fabric 9- Dyed sateen fabric of 93-100% cotton and 0-7% elastomeric, classified in HTSUS 5209.39.0020. We have the capability and the capacity to make this fabric, especially at the weights covered by the HTS number. We have made this type fabric on many occasions, but just not as frequently as we make twill fabrics.

Fabric 11- Dobby weave fabric of 100% cotton, classified in HTSUS 5209.39. We would not normally weave this fabric, but do have equipment with which we could make it. However, we are aware of other U.S. textile producers who could (and do) weave this fabric in the greige state on a regular basis, and we do have the ability to regularly dye and finish that fabric here in the U.S.

Fabric 23- Woven two-way stretch twill fabric of 85-98% cotton and 2-15% elastomeric, classified in HTSUS 5209.32. Our comments here would be similar to those for Fabric 6, but the fabric here is more of the weight we normally make in our cotton/elastomeric fabrics. The only reservation we would have is how much warp stretch would be desired, but we can and do make on a regular basis twill fabrics that stretch in both the warp and filling direction.

Fabric 25- Woven twill fabric of 77-87% cotton, 12-22% polyester and 0-6% elastomeric, classified in HTSUS 5211.43. Same comments as for Fabric 23, with the possible exception that if yarn dyed fabric is essential, we might have to source the yarn outside Mount Vernon. But we do source yarn (both dyed and not dyed) from other U.S. yarn producers on a regular basis, and that would not be a problem here.

Fabric 32- Woven fabric of 92-100% cotton and 0-8% elastomeric, classified in HTSUS 5209.31. Our prior comments regarding cotton/elastomeric fabric (see Fabrics 6, 9, 23, and 25) apply here as well, with the only difference being the fabric here has plain weave. But we do make plain weave fabrics like this on a regular basis.

In summary, Mount Vernon believes that, with respect to the six fabrics described above, these fabrics can be supplied by the U.S. domestic industry in commercial quantities in a timely manner. Therefore, the request from the government of Bahrain to revise the rule of origin for these fabrics under the U.S. Bahrain Free Trade Agreement should be denied. Thank you for the opportunity to comment on this issue.

Sincerely,

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

Edward G. Cochrane
Vice President and Secretary