Glen Raven Custom Fabrics

March 17, 2008

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

Re: Commercial Availability Request Under the North American Free Trade Agreement Warp Pile Fabric, Cut of HTS 5801.35 made with Solution Dyed Acrylic Staple fibers of HTS 5503.30

Dear Mr. Priest:

In response to the comments submitted on behalf of Kaltex Fibers S.A. de C. V. ("Kaltex") by Benchmarks, Inc. to the notice published by the Committee of the Implementation of Textile Agreements (CITA) in the *Federal Register* of January 25, 2008 (73 FR 4542), Glen Raven Custom Fabrics LLC respectfully submits the following.

It is Glen Raven's position that the Kaltex Letter of February 25, 2008 contains inaccuracies, leaps of faith, and promises of future performance and capability that are simply not supported by fact.

To begin, Glen Raven disagrees that there is ample supply of the pigmented solution-dyed acrylic fiber that we require for our outdoor warp pile fabrics. We concur that ***commodity*** raw-white acrylic fiber is not in short supply worldwide, let alone in the NAFTA region.

However, pigmented solution-dyed UV resistant acrylic fiber is in short supply – indeed, this fiber is not currently available in tested, commercial quantities anywhere in the NAFTA region.

Below, we will address the rather bold claims made in the Kaltex/Benchmarks letter of February 25, 2008.

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Kaltex' statements: "*Kaltex provided samples of the company's solution dyed fiber for full laboratory testing analysis by Glen Raven*" and "*Kaltex has every reason to believe that the results of those tests, which are anticipated by late March, will be favorable.*"

Reality: Approximately two 100 pound fiber samples (1.7d 48 mm bright natural raw white staple and 1.7d 48 mm bright solution dyed nano-titanium white staple) were received from Kaltex Fibers. The natural raw white fiber carded at Glen Raven's standard processing rate. The solution (pigment) dyed nano-titanium white fiber processed at 40% reduced carding rate. If this processing rate is typical of the Kaltex solution dyed fiber, the Kaltex pigmented fiber is not commercially viable for Glen Raven's mill practice, productivity standard and conversion cost.

Kaltex statement: "*Previously, Glen Raven had tested fabric samples utilizing three of Kaltex' solution dyed fiber shades on its weatherometer with all shades passing Glen Raven's UV testing requirements.*"

Reality: Natural, blue and black shades were tested under two light fastness test methods, AATCC 169, option 3 and J1960 and the results achieved Glen Raven's standards. But the samples' size was insufficient to conduct all key parameter tests. So the complete test protocols have not been conducted and many key parameters are not known. Light fastness testing of 3 (three) colors can not validated the performance of Glen Raven's approximately 70 (seventy) shade solution dyed acrylic product line. These shades were developed with selected pigment colorants to achieve optimum color fastness across a full shade spectrum. Based on Glen Raven's 40+ years of working with solution dyed acrylic fibers, it is questionable if Kaltex has sufficient pigments qualified to develop all of the required solution dyed shades.

Kaltex statement: "*Glen Raven reported that spun yarn made with Kaltex' ecru fiber performed well both in terms of Glen Raven's standards and when compared to its existing supplier's product.*"

Reality: Inaccurate. Please see first response, above.

Kaltex statement: "*Kaltex has experienced no technical or quality problems in meeting customers' demand for solution dyed fiber.*"

Reality: Unknown. We believe that Kaltex claims to have sold solution dyed product to 2 (two) customers outside of their pre-existing business. However, aside from the significant issues noted above, one very significant additional point is that Kaltex' fiber is a **low** tenacity acrylic fiber; whereas Glen Raven uses a **high** tenacity acrylic fiber to improve fabric performance characteristics. It is simply an unknown if Kaltex can manufacture the high tenacity fiber with the required performance characteristics.

Also, due to the miniscule quantities produced and provided by Kaltex, Glen Raven has been unable to test fabric finishes on warp pile fabrics woven with Kaltex fibers (assuming it is even possible to do so), therefore we also know nothing about final fabric performance.

In conclusion, Glen Raven's position is that Kaltex' solution dyed acrylic fiber is not commercially qualified as a Glen Raven production fiber. Further, we see no evidence that Kaltex has achieved commercial production of this specialty fiber and the large palette of colors/pigments required. Therefore we must for the foreseeable future, continue to purchase our pigmented solution-dyed acrylic fiber from outside the NAFTA region for our warp pile fabrics. We therefore reaffirm our request for duty relief.

Respectfully,

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