

Glen Raven Custom Fabrics



May 30, 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: Second Glen Raven Rebuttal - 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 rebuttal submitted May 21, 2008 on behalf of Kaltex Fibers S.A. de C. V. 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 rebuttal.

It remains Glen Raven's position that the Kaltex letter of February 25, 2008, and their rebuttal of May 21, 2008, alleges competencies and capabilities that are simply not supported by fact.

In this, our 2nd rebuttal, we at Glen Raven will focus on the facts related to the sourcing, testing, and spinning of solution-dyed acrylic fiber:

- Glen Raven has 40+ years experience in purchasing, qualifying, testing, and spinning solution-dyed acrylic fibers in 80-plus colors from 5 separate vendors on 3 continents.
- This hard-won experience has endowed Glen Raven with the invaluable (and unrivaled) ability to judge the veracity of claims made by would-be producers of solution-dyed acrylic fibers for use in outdoor applications.
- Kaltex, in contrast, has 18 months experience producing solution-dyed acrylic fibers with a palette of 6 colors (a majority of production being one color - carbon black).

Glen Raven Custom Fabrics, LLC
1831 North Park Avenue
Glen Raven, NC 27217-1100

Telephone (001) 336-227-6211
Fax (001) 336-566-1169
www.glenraven.com

- Kaltex is working to become a new entrant into the solution-dyed acrylic market, and this has proven to be a very complicated and lengthy process for even those with significantly more experience in these markets.
- Kaltex' statement that "there may have been a breakdown in internal Glen Raven communications" resulting in some claimed inability to properly test Kaltex fibers - and later stating that this alleged breakdown was a willful stalling technique to see this Duty Relief petition through - is a complete mischaracterization of the facts and is indeed a symptom of being unfamiliar with the testing requirements of the market they wish to enter.

As an example, one of the key tests (in a battery of test that must be performed – and passed) is the testing of the fiber sample in a weatherometer - an accelerated test for UV and weather exposure over time. Glen Raven's standards require testing to 2200kj...and this test alone takes 16 (sixteen) *weeks* in the weatherometer machine.

- With the demise in 2005 of the last North American supplier of solution-dyed acrylic fiber (Solutia), Glen Raven's highly capable and experienced technical team had the arduous task of qualifying a would-be supplier of solution-dyed acrylic fiber and moving them from a strictly commodity ecru ("natural") acrylic fiber supplier to a fully qualified, commercial producer of solution-dyed acrylic fiber (now one of three current solution-dyed acrylic fiber suppliers to Glen Raven).
- This "learning curve" took thousands of man-hours on the part of Glen Raven and the fiber producer, hundreds of days spent by our US-based technical team members at overseas plants, and many thousands of metric tons of trial-fiber before this would-be vendor of solution-dyed acrylic fiber was commercially viable as a supplier to Glen Raven. This process, from beginning to end, took 2 ½ years.
- After testing fiber and through site visits, our uniquely knowledgeable and experienced technical team has determined that Kaltex is at precisely the same spot in outdoor solution-dyed acrylic fiber product knowledge that the above mentioned vendor was at the *beginning* of the 2 ½ year learning curve.
- Kaltex' large commodity-scaled manufacturing footprint, juxtaposed with the broad palette of colors that Glen Raven consumes, clearly shows Kaltex does not at this time possess the manufacturing flexibility to fully service Glen Ravens' global color requirements. And, it must be mentioned, there is no guarantee Kaltex Fibers will ever achieve these requirements.

Perhaps one day - with a massive research and development effort - Kaltex will be in the position to be a "valued supplier" to Glen Raven. This is not the case today. Again, **Glen Raven is in the uniquely qualified position to state unequivocally that Kaltex Fibers S.A. does not yet produce a pigmented solution-dyed acrylic fiber that meets Glen Raven's global fiber specifications** (color retention, color consistency, fiber/polymer purity, lack of contamination, fiber finish compatibility, range of colors, lot size flexibility, etc).

Therefore, Glen Raven must continue to purchase pigmented solution-dyed acrylic fiber from outside the NAFTA region for our warp pile fabrics made with solution-dyed acrylic fibers. Glen Raven respectfully **reaffirms** our request for NAFTA modification and duty relief.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "P. S. Bell". The signature is fluid and cursive, with a large initial "P" and "S".

Patrick S. Bell, Sr.
Director of Sourcing – Raw Materials
Glen Raven, Inc.
1831 N. Park Avenue
Burlington, NC 27217
+1.336.227.6211