



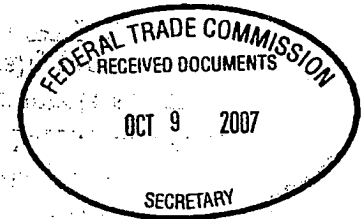
Avalon Carpet Tile and Flooring

DESIGN CENTERS

Your Price Leader of Quality Flooring Products

October 3, 2007

Federal Trade Commission/Office of Secretary
Room H-135 (Annex K)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580



Re: "16 CFR Part 303-Textile Rule 8
Mohawk, Dupont, and PTT Canada Comment"
Matter No. P074201

To Whom It May Concern:

Pursuant to a petition filed by Mohawk Industries, Inc. ("Mohawk"), E.I. du Pont de Nemours and Company ("DuPont"), and PPT Poly Canada ("PTT Canada"), the following are comments on amending Rule 7 (c) of the Rules and Regulations under the Textile Fiber Products Identification Act to establish a new generic fiber subclass name and definition within the existing definition of "polyester" for a specifically proposed subclass of polyester fibers made from poly(trimethylene terephthalate) ("PTT").

*PTT fiber, while having the general chemical composition of polyester, is a better product than what people traditionally think of as polyester since PET historically has not had good wear characteristics. If we have to call it polyester, it is misleading the consumer and the dealer as to how good the product really is.

* The product performs so much better than PET that it should be allowed a new name.

* Prior experience with PET has jaded dealers and caused them to not want to sell anything called polyester. Forcing a fiber, with much better performance than PET, to use the same name, will limit the consumer's ability to purchase the product.

As a retailer with 12 locations, I am very interested in clearing up the confusion between the fibers mentioned above. Being in the industry for 40 years, there is a big difference between the fibers. If you have any questions regarding these comments, please do not hesitate to contact me. *A*

Thank you,

John P. Millar
John P. Millar
President
Avalon Carpet Tile and Flooring