

January 05, 2018

Chairman
Committee for the Implementation of Textile Agreements
Room 30003
United States Department of Commerce
Washington, DC 20230

Via Email: OTEXA_MoroccoFTA@trade.gov

RE: Support for Pending Morocco FTA Commercial Availability Requests (FR Doc No: 2017-24088, FR Doc No: 2017-24089)

Dear Mr. Chairman:

I am writing to express support for the pending short supply requests for the Morocco Free Trade Agreement (FTA).

Representing more than 1,000 world famous name brands, the American Apparel & Footwear Association (AAFA) is the trusted public policy and political voice of the U.S. apparel and footwear industry, its management and shareholders, its nearly four million U.S. workers, and its contribution of \$384 billion in annual U.S. retail sales.

The two requests cover a series of blends for specific tops and bottoms categories. Our experience is that these blends – particularly those with rayon and acrylic – are generally not available in commercial quantities in the U.S. or Morocco on a fiber forward basis. We are concerned that these fabrics cannot be provided in a manner that meets the applicable rules of origin. If your investigation discovers mills that do provide these fabrics, we would be interested in knowing more.

We do note that, since the expiration of the TPL, trade under the FTA has dropped precipitously. In 2015, the last full year that the TPL was in effect, total imports equaled 122.5 million square meter equivalents (SMEs), with more than 42 million SMEs (about 34 percent) coming under the FTA. For the year ending October 2017, although imports ticked up to 131.6 million SMEs, total imports under the FTA plummeted to 5.3 million SMEs (about 4 percent). Designation of these materials would help reverse that decline.

Thank you for your time and consideration in this matter. Please contact me at 202-853-9347 or slamar@aafaglobal.org if you have any questions or would like additional information.

Sincerely,



Stephen Lamar
Executive Vice President