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May 16, 2016

Chairman, Joshua Teitelbaum,
Committee for the Implementation of Textile Agreements
Room 30003
U.S. Department of Commerce
14th and Constitution Avenue NW.
Washington, DC
20230

Mr. Teitelbaum

RE: MODALINE HOLDING, Has requested that the United States consider whether the USMFTA rule of origin for women's pants classified in HTSUS heading 6204 should be modified to allow the use of certain woven fabrics that are not originating under the USMFTA.

I represent ITG/Burlington with wool and polyester weaving and finishing in Raeford, NC., Richmond, NC. And Burlington NC.

We possess the ability to manufacture the two fabrics below (Fabric #4 and #5 is their short supply request).

For this reason I would request that the Department of Commerce reject this request.

Fabric 4: 94%–99% virgin wool, 1%–6% spandex, twill stretch flannel reactive dyed fabric, classified in subheading 5112.11 of the HTSUS; and

Fabric 5: 89%–95% polyester, 5%–11% spandex printed and solid woven polyester crepe fabric (with filament yarn size of 120D + 40D*120D + 40D and a construction of 175*104), classified in subheading 5407.61 of the HTSUS.

Thank you for your attention to this matter.


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