



May 24, 2024

Ms. Jennifer Knight, Chairman  
Committee for the Implementation of Textile Agreements  
U.S. Department of Commerce  
14th and Constitution Avenue NW  
Washington, DC 20230

Submitted via [OTEXA.USMCA@trade.gov](mailto:OTEXA.USMCA@trade.gov)

Re: Request for Public Comment on a Commercial Availability Request Under the United States-Mexico-Canada Agreement (89 FR 31145)

Dear Ms. Knight:

Thank you for the opportunity to comment on the Government of Canada's request to modify the United States-Mexico-Canada Agreement (USMCA) to allow for the use of certain non-originating high tenacity polyester yarns for use in fire hose.

Specifically, Shuford Yarns LLC's comments refer to the following yarns and end uses described below:

Input product description	Input product classification, harmonized tariff schedule of the U.S. (HTSUS)	End use product description	End-use product classification (HTSUS)
High-tenacity polyester yarn, single or multiple, multifilament, untwisted, untextured, and measuring more than 920 decitex	5402.20	Fire hose, with or without lining, armor or accessories of other materials	5909

Shuford Yarns is headquartered in Hickory, NC, and operates three plant locations across North Carolina. Our product offerings include the high tenacity yarns that Canada is claiming are not available. We are currently producing the subject yarns and are an established producer supplying the USMCA/NAFTA market.

The production capacity exists currently at Shuford to deliver the quantities needed by Canadian producers of fire hose.

We understand that under the terms of USMCA, Canada's requested modification does not require the due diligence exercise normally associated with commercial availability reviews. However, when this step is omitted, which involves a simple phone call or e-mail, it raises process concerns and can result in requests being submitted that are unfounded.



In conclusion, based on Shuford's ability to produce these high-tenacity polyester yarns for fire hose applications, we object to this modification and respectfully urge CITA to reject this request. Thank you again for the opportunity to comment, and please reach out if we may provide further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marvin Smith', followed by a large, stylized flourish.

Marvin Smith  
President/CEO  
Shuford Yarns, LLC  
[msmith@shufordyarns.com](mailto:msmith@shufordyarns.com)  
828-381-0654