

August 15, 2006

The Honorable Charles Grassley Chairman, Senate Finance Committee 219 Dirksen Office Building Washington, DC 20510

# RE: Opposition to Duty Suspension Legislation under Consideration by the Senate Finance Committee

Dear Mr. Chairman:

On behalf of the National Council of Textile Organization's (NCTO) and our member companies, I am writing to let you know of our strong opposition to the inclusion of the following measures in the proposed miscellaneous tariff bill currently being developed by the Senate Finance Committee

NCTO is a not-for-profit trade association established to represent the entire spectrum of the United States textile sector, from fibers to yarns to fabrics to finished products, as well as suppliers in the textile machinery, chemical and other such sectors which have a stake in the prosperity and survival of the U.S. textile sector. Our headquarters are in Washington, D.C., and we also maintain an office in Gastonia, NC.

#### <u>S. 3071</u>

Legislation to suspend the duty on fabric woven with certain continuous filament wholly nylon type-66 textured yarns.

NCTO strongly opposes this legislation as there are currently U.S. textile companies who make the fabric targeted by S. 3071. In addition to the fabric, there are also U.S. companies who produce nylon type-66 textured yarns. As a result, if this bill were enacted it would have a very damaging effect on two very important segments of the U.S. textile industry who are currently producing woven fabric with certain continuous filament wholly nylon type-66 textured yarns and its components in the U.S.

S. 3123 S. 3125 S. 3126 S. 3127

#### Legislation to suspend the duties on ski and snowboard pants.

NCTO strongly opposes legislation to suspend the duties on ski and snowboard pants as there are currently U.S. textile companies who would be severely damaged if these proposals were enacted.

Last year, the Committee for the Implementation of Textile Agreements (CITA) reimposed quotas on imports of man-made fiber trousers from China because of the damage that these imports were inflicting upon U.S. trouser fabric manufacturers. When the quota filled for this category in July 2005, U.S. importers and retailers were granted an exemption for ski and snowboard pants, and since November 1, 2005, these products have not been subject to quota.

NCTO strongly opposed this exemption because of the damage it would inflict on U.S. trouser fabric manufacturers. When exemptions are granted for any product, but especially commodity, high-volume products like trousers, the potential for illegal transshipment across these product lines becomes extremely high, and as expected, Chinese imports of these products are up significantly in 2006. If duties on these products were suspended, illegal transshipment in these products would only increase further as other types of trousers would be misclassified to avoid duties, which for manmade fiber trousers averages 26 percent.

Suspending duties on these products will only further erode business and opportunity for U.S. fabric manufacturers and seriously harm trouser production in this hemisphere. Eliminating duties on sensitive products, like trousers, would also seriously undermine U.S. negotiating authority in bilateral and multilateral negotiations by unilaterally disarming while requiring no concessions from our trading partners in return.

#### S. 3150

Legislation to suspend the duty on tarpaulins measuring 9-feet by 12-feet with a polyvinyl chloride (PVC) coating.

NCTO strongly opposes S. 3150 because of the damage it would cause to U.S. tarpaulin manufacturers. NCTO has several member companies who produce fabric for U.S. tarpaulin manufacturers and these producers would also be harmed by this proposal.

Furthermore, U.S. tarpaulin manufacturers depend on the commercial market for their products to help balance out the ebbs and flows of U.S. military purchasing. If the commercial market for these products is further eroded because of this legislation, the ability of these companies to continue to supply the U.S. military is also negatively impacted.

#### S. 3164

#### Legislation to suspend the duty on certain tents.

NCTO strongly opposes S. 3164. There is a well established tent manufacturing industry in the U.S. that provides employment to thousands of individuals and is the economic backbone for many small communities. These manufacturers and their employees would be severely impacted if this legislation is approved.

Most of the companies engaged in the manufacturing of tent fabrics for commercial use are also suppliers to the U.S. military. The loss of the commercial tent business would make it impossible for these companies to remain in business and therefore threaten the ability to adequately supply our military with one of its most basic needs. At a time when our military is already struggling to maintain its readiness posture, we do not believe it would be prudent to pass legislation which would eliminate a major supply chain for our nation's military.

#### S. 3217

#### Legislation to suspend the duty on certain viscose rayon yarn.

NCTO strongly opposes legislation to suspend the duty on certain viscose rayon yarn. There are currently U.S. yarn companies that are capable of producing the yarn targeted by this proposal. Due to the negative impact this legislation would have on these companies, we oppose its inclusion in the miscellaneous tariff bill currently under consideration by the Committee.

#### S. 3227

# Legislation to suspend the duty on certain twisted yarn of viscose rayon.

NCTO strongly opposes legislation to suspend the duty on certain twisted yarn of viscose rayon. There are currently U.S. yarn companies that are capable of producing the yarn targeted by this proposal. Due to the negative impact this legislation would have on these companies, we oppose its inclusion in the miscellaneous tariff bill currently under consideration by the Committee.

S. 3241

S. 3242

# Legislation to suspend the duties on certain backpacks.

NCTO strongly opposes legislation to suspend the duties on certain backpacks. The only difference in these two proposals is that S. 3241 is a backpack with a removable separate backpack or daypack and S. 3242 does not have a removable component.

NCTO has several member companies who produce fabric for U.S. backpack manufacturers and these producers would harmed by this proposal. Most of the companies engaged in the manufacturing of backpacks for commercial use are also suppliers to the U.S. military. The loss of the commercial backpack business would make it impossible for these companies to remain in business and therefore threaten the ability to adequately supply our military with one of its most basic needs. At a time when our military is already struggling to maintain its readiness posture, we do not believe it would be prudent to pass legislation which would eliminate a major supply chain for our nation's military.

S. 3393 S. 3394 S. 3396 S. 3397 S. 3400 S. 3401 S. 3402 S. 3403

## Legislation to suspend the duties on certain water resistant pants.

NCTO strongly opposes these eight bills to suspend the duty on certain water resistant pants. As with the ski and snowboard pants, U.S. trouser fabric manufacturers would be severely damaged if this proposal were enacted.

It is important to point out that most of the products targeted by this legislation are currently under quota from China as a result of the U.S.-China Textile Bilateral Agreement that was signed last November. Therefore, as a result of the government's own actions, these products have already been identified as import sensitive and should be managed carefully.

When duties are eliminated for specific subsets of commodity, high-volume products like trousers the potential for illegal transshipment across these product lines becomes extremely high. If duties on these products were suspended, illegal transshipment would only increase further as other types of trousers would be misclassified as water resistant to avoid duties, which for trousers average XX percent.

Of equal concern is the fact that the definition for "performance outerwear pants" is very broad and could lead to unforeseen problems for U.S. producers of similar products. Suspending duties on these products will only further erode business and opportunity for U.S. fabric manufacturers and seriously harm trouser production in this hemisphere. For example, trade in water resistant pants in the NAFTA/CBTPA region totaled \$229 million last year. The benefits of these agreements would be completely nullified if proposals such as this are allowed to move forward.

Eliminating duties on sensitive products, like trousers, would also seriously undermine U.S. negotiating authority in bilateral and multilateral negotiations by unilaterally disarming while requiring no concessions from our trading partners in return.

#### S. 3641

Legislation to suspend the duty on certain woven fabrics of cotton, containing less than 85 percent by weight of cotton.

NCTO strongly opposes efforts to suspend the duty on certain woven fabrics of cotton containing less than 85 percent by weight of cotton. We have several member companies who are currently producing this fabric as well as members who manufacture the yarns that go into this product.

U.S. manufacturers of this fabric are currently supplying this fabric to their customers throughout the NAFTA/CAFTA region and can easily meet the demand of the U.S. market.

Due to the negative impact this legislation would have on these companies, we oppose its inclusion in the miscellaneous tariff bill currently under consideration by the Committee.

#### S. 3642

Legislation to suspend the duty on knitted or crocheted fabrics of cotton, printed.

NCTO strongly opposes efforts to suspend the duty on knitted or crocheted fabrics of cotton, printed. We have several member companies who are currently producing this fabric as well as members who manufacture the yarns that go into this product.

U.S. manufacturers of this fabric are currently supplying this fabric to their customers throughout the NAFTA/CAFTA region and can easily meet the demand of the U.S. market.

Due to the negative impact this legislation would have on these companies, we oppose its inclusion in the miscellaneous tariff bill currently under consideration by the Committee.

### S. 3643

Legislation to suspend the duty on certain woven fabrics of cotton containing less than 85 percent by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m.

NCTO strongly opposes efforts to suspend the duty on certain woven fabrics of cotton containing less than 85 percent by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m. We have several member companies who are currently producing this fabric as well as members who manufacture the yarns that go into this product.

U.S. manufacturers of this fabric are currently supplying this fabric to their customers throughout the NAFTA region and can easily meet the demand of the U.S. market.

Due to the negative impact this legislation would have on these companies, we oppose its inclusion in the miscellaneous tariff bill currently under consideration by the Committee.

# <u>S. 3644</u>

Legislation to suspend the duty on weft pile fabrics of cotton, other than uncut weft pile fabrics or cut corduroy.

NCTO strongly opposes efforts to suspend the duty on weft pile fabrics of cotton, other than uncut weft pile fabrics or cut corduroy. We have several member companies who are currently producing this fabric as well as members who manufacture the yarns that go into this product.

U.S. manufacturers of this fabric are currently supplying this fabric to their customers throughout the NAFTA/CAFTA region and can easily meet the demand of the U.S. market.

Due to the negative impact this legislation would have on these companies, we oppose its inclusion in the miscellaneous tariff bill currently under consideration by the Committee.

In closing, we strongly encourage you to prevent the inclusion of the measures outlined above from any miscellaneous trade bill or other relevant legislation considered by the Senate.

Thank you for your consideration of these comments and concerns.

Sincerely,

Cass Johnson

President

cjohnson@ncto.org

# ICF Industries, Inc. 175 A Bergen Boulevard Fairview, NJ 07022

August 16, 2006

Senator Chuck Grassley Chairman, United States Senate Committee on Finance 135 Hart Senate Bldg. Washington, DC 20510

Dear Senator Grassley:

This letter is respectfully submitted in support of S. 3217 and S. 3227 to urge their inclusion in this year's Miscellaneous Tariff bill.

S. 3217 and S. 3227 have been introduced by Senator Menendez at the request of ICF Industries ("ICF") and its customers. ICF is a New Jersey based merchant distributor of manmade filament yarns. ICF's customers are U.S. weavers, knitters and yarn processors. Both ICF's office and its warehouse are located in Fairview, New Jersey.

Among the products which ICF purchases in Europe and distributes in the United States is rayon filament yarn produced by Enka GmbH & Co. KG of Germany. Enka is regarded as the world's highest quality producer of rayon filament yarn.

ICF has sought the inclusion of these two tariff suspension measures in the Miscellaneous Tariff bill for the current Congress in order to obtain a temporary suspension of the 10% duty on rayon filament yarn.

#### The Product

Rayon filament yarn is a synthetic fiber extruded by what is known as the viscose process in which cellulose is liquefied via dilution in a caustic alkali solution, heated with carbon disulfide and then forced through tiny spinneret holes into a bath where it coagulates to form extremely fine jets of rayon filament yarn. The product has a wide variety of end uses ranging from delicate, silk-like fabrics made for apparel out of fine denier textile yarn; to lining, velvet and other more durable textile fabrics for apparel; to embroidery, monogramming and other decorative stitching threads; to drapery, upholstery and other fabrics for home furnishings.

#### The Proposed Legislation

The proposed legislation applies to three categories of textile rayon filament yarn as described in subheadings 5403.31.00 and 5403.32.00 of the HTS. Specifically, the proposed legislation would suspend the duty on the following categories of yarn for three years:

• HTS #5403.31.00: Other yarn, single: Of viscose rayon, untwisted or with a twist not exceeding 120 turns per meter;

Monofilament; multifilament, untwisted or with twist of less than 5 turns per meter (#5403.31.00.20)

Multifilament, with twist of 5 turns or more per meter (#5403.31.00.40)

• HTS #5403.32.00: Other yarn, single: Of viscose rayon, with a twist exceeding 120 turns per meter.

The general duty rate applicable to these yarns is ten percent. Although imports from Canada, Chile, Israel, Jordan, Morocco, Mexico and Singapore are exempt from duty, and although the current duty rate for imports from Australia is three percent, no rayon filament yarn production facilities exist in any of these countries.

#### Absence of Domestic Production

There is no longer any producer of rayon filament yarn in the United States.

According to data complied by the <u>Textile Organon</u>, a respected industry publication, 658 million pounds of rayon filament yarn were produced in the United States during the year 1953. Thereafter, a combination of environmental and economic constraints forced producers in this country to reduce capacity or to shut down altogether. By 1965 U.S. production had been reduced to 434 million pounds. By 1975 U.S. production had dropped to 65 million pounds. By 1984, production in the United States was down to 41 million pounds.

By the late 1980's there was only one remaining producer of rayon filament yarn in the United States. This company was the North American Rayon Corporation ("North American") of Elizabethton, Tennessee. In 1996 North American sold only 9.5 million pounds of rayon filament yarn and was being crushed by the massive financial burden of attempted compliance with the stringent federal and state environmental regulations applicable to the environmentally "dirty" rayon filament yarn extrusion process. In late 1996, North American terminated all of its rayon filament yarn manufacturing activities other than those related to the production of carbonizable yarn. During or about 2000, North American decided to follow the lead of all other U.S. producers and shut down its rayon filament yarn manufacturing activities altogether.

North American's exit from the rayon filament yarn production business means that there is no longer any producer of this product in the United States. Further, the high costs which

would be associated with the construction in the United States of a new rayon filament yarn manufacturing facility that could meet this country's stringent environmental standards, coupled with the historically low margins for textile and apparel inputs, assure that domestic users of rayon filament yarn will not be able to obtain these yarns from U.S. producers during coming years.

#### The State of the Industry

Although rayon filament yarn is no longer produced in the United States, U.S. weavers, knitters and yarn processors still utilize this product, principally in connection with the manufacture of apparel and related products. As you undoubtedly know, conditions in the U.S. textile industry are bleak. Selling prices are down. Employment is down. Looms, knitting machines and twisting and other processing machines are standing idle. These conditions apply equally to U.S. weavers, knitters and yarn processing users of rayon filament yarn who have been hit hard by intense competition from overseas suppliers of fabrics and stitching threads containing rayon filament yarn, and by the importation of low priced apparel and home furnishings.

#### Conclusion

ICF respectfully submits that the proposed legislation would be in the best interest of all remaining U.S. users of rayon filament yarn. ICF further respectfully submits that since there is no domestic producer of this product, no U.S. industry would be harmed by the proposed legislation.

Sincerely,

Michael A. Trachtenberg

cc: Erin M. McGlaughlin
Chemicals and Textiles Division
Office of Industries
US International Trade Commission

LAWRENCE SCHIFF SILK MILLS, INC.

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Established 1918

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Sales Agents: **L\$\$M Sales, Inc.** 79 Madison Avenue New York, NY 10016 212-679-1660 FAX: 212-696-4565

Narrow Fabrics Group 780 E. Francis St., Unit A Ontario, CA 91761 714-923-4300 FAX: 714-923-4400

Senator Chuck Grassley Chairman, United States Senate Committee on Finance 135 Hart Senate Bldg. Washington, DC 20510

Reference:

S. 3217 and S. 3227

Suspension of US Duty

Dear Senator Grassley:

I take this opportunity to comment on the bills at reference each of which seeks suspension of the duty on Rayon filament textile yarn. I am the president and chief executive officer of Lawrence Schiff Silk Mills, Inc. in Quakertown, PA. We are manufactures of textile narrow woven fabrics, and we employ approximately 200 people at facilities which are located in Quakertown and Newville, PA. The ability to obtain Rayon filament yarn at reasonable prices is essential to our business.

We use Rayon filament yarn in a number of our products which are used for seam binding and variable ribbon applications. It is no longer possible for us to purchase Rayon filament yarn from a US source because the sole American producer, the North American Rayon Corporation, has ceased production of Rayon filament yarn some 10 years ago. There is no US or North American producer of Rayon filament yarn. Accordingly, we regard continuation of the current 10% duty on Rayon filament yarn unnecessary and counter productive to the interest of US weavers. Suspension of the duty would enable us to reduce our costs and become more competitive against suppliers of textile products from other parts of the world.

We regard retention of the existing duty damaging to our best interests, and we appreciate your favorable consideration to the legislation that is currently being considered to suspend the duty on Rayon filament yarn. The proposed legislation would equally aid our customers who face the same competitive pressures from products that are imported into this country.

We thank your for your support.

Sincerely,

Lawrence Schiff Silk Mills

Richard J. Schiff

CC:

Erin M. McGlaughlin

Chemicals and Textiles Division

Office of Industries

US International Trade Commission

# MOHAWK FABRIC COMPANY, INC.

MANUFACTURERS OF

#### WARP KNITS and TRICOT FABRICS

P.O. BOX 587

AMSTERDAM, N.Y. 12010-0587 Telephone 518-842-3090 FAX 518-842-3095

Senator Chuck Grassley Chairman, United States Senate Committee on Finance 135 Hart Senate Bldg. Washington, DC 20510

Reference:

S. 3217 and S. 3227

Suspension of US Duty

Dear Senator Grassley:

Mohawk Fabric Co., Inc. is pleased to comment in respect to the bills at reference above. It is very much in our interest to support legislation that would suspend the duty that is currently in place on Rayon filament yarn which we use in the manufacture of our products.

We use Rayon filament yarn for a variety of technical applications, and insofar as it is no longer possible to purchase it from a US producer, we must source the yarn from overseas. We regard continuation of a duty on the yarn unnecessary and counter productive to our best interest. Suspension of the duty will enable us to reduce costs and make our products more competitive with those that are imported. Moreover, the suspension of the duty will also help our customers who continue to face pressure from imported products.

We hope very much that you will give your every consideration to our concerns, and that the Congress will support our efforts to continue producing products in this country. We thank you for your consideration.

Dominic S. Wade General Manager

cc: Erin M. McLaughlin

Chemicals and Textiles Division

Office of Industries

**US International Trade Commission** 

6 Beacon Street, #1125, Boston, Mass. 02108 (617) 542-8220 (617) 542-2199 fax

July 28, 2006

The Honorable Charles Grassley Chairman, Senate Finance Committee 219 Dirksen Office Building Washington, DC 20510

> National Textile Association Statement Regarding Miscellaneous Tariff Measures Introduced in the Senate During the 109th Congress

Dear Mr. Chairman:

I write in response to the July 11, 2006, Senate Finance Committee solicitation of statements regarding miscellaneous tariff measures introduced in the Senate during the 109th Congress.

The National Textile Association is the nation's oldest and largest organization representing the fabric-making industry in the U.S. Our members knit, weave, dye, print, and finish fabric in the U.S., as well as supply the fabric industry with fibers, yarns, and other products and services.

From the list published at <a href="http://finance.senate.gov/sitepages/2006MTB.htm">http://finance.senate.gov/sitepages/2006MTB.htm</a> we have identified three bills that we must oppose as harmful to the interest of domestic producers we represent.

**NTA opposes S.738** a bill to provide relief for the cotton shirt industry. We have communicated our concerns to a representative of the U.S. cotton shirt industry and he agreed to changes to the bill to make it acceptable to NTA. Those changes resulted in the filing of a new bill, S.3344 to which NTA has no objection.

NTA opposes S.1954 the *Insular Possessions Act of 2005*.

This bill would amend the requirements for duty-free treatment of goods shipped to the U.S. from insular possessions of the U.S. by lowering, from 50 percent to 30 percent, the percentage of the total value of a good which must originate in the insular possession or the U.S. This change is of great interest to U.S. textile producers because the Commonwealth of the Northern Mariana Islands (CNMI) is one of the beneficiaries of the insular possessions duty-free provision, being a

major shipper (79 million square meters worth in 2005) of apparel articles to the U.S.

In addition to duty-free status, the CNMI enjoys an extremely privileged trading relationship with the U.S. Apparel articles assembled in the CNMI may, legally, be marked "Made in the U.S.A." notwithstanding that the CNMI is exempt from the U.S. minimum wage. Furthermore, exemption from U.S. immigration laws, combined with the CNMI's own liberal guest worker program means that most of the apparel jobs in the CNMI are not even held by citizens of the CNMI.

Allowing more foreign content in goods entered duty-free from insular possessions will create an incentive for manufacturers to reduce insular possession/U.S. content in favor of cheap inputs from foreign countries. Among these foreign beneficiaries is, undoubtedly, China. U.S. imports of certain textile and apparel articles of Chinese origin are limited, through the year 2008, under a bilateral agreement between the U.S. and China. S.1954 would create a loop-hole for Chinese-origin goods to enter the U.S., via the CNMI, in circumvention of the hard-won U.S.-China bilateral agreement.

**NTA opposes S.3642** a bill to temporarily suspend the duty on knitted or crocheted fabrics of cotton, printed. The NTA member companies who indicate that they manufacture cotton knit fabrics in the U.S. are

Alamac American Knits LLC Beverly Knits, Inc. Contempora Fabrics Domestic Fabrics Fab Industries, Inc. Safer Textile Processing

From the list published at <a href="http://finance.senate.gov/sitepages/2006MTB.htm">http://finance.senate.gov/sitepages/2006MTB.htm</a> we have identified the follow bills that we support, the passage of which would be beneficial to the domestic producers we represent, or to which we have no objection:

**NTA supports S.982** a bill to suspend the duty on certain rayon staple fibers. To the best of our knowledge and believe there is no domestic source for rayon.

**NTA supports S.2328** a bill to extend through 2009 the existing duty suspension on certain synthetic filament yarns.

**NTA supports S.2329** a bill to extend through 2009 the existing duty suspension on certain filament yarns.

NTA supports S.3022 NTA supports S.3023 NTA supports S.3024 NTA supports S.3025 NTA supports S.3026 NTA supports S.3027 NTA supports S.3028 NTA supports S.3029

These bills are suspension (or extend existing suspensions) of duty on certain fibers, yarns, and fabrics of fine animal hair such as cashmere, camel hair, and vicuna. These fibers are not commercially produced in the U.S. and the domestic producers of yarns and fabrics of fine animal hair support the duty suspension.

NTA supports S.3051

NTA supports S.3052

NTA supports S.3053

NTA supports S.3054

**NTA supports S.3217**. To the best of our knowledge and belief there is no domestic source for this rayon.

**NTA supports S.3227** To the best of our knowledge and belief there is no domestic source for this rayon.

NTA supports S.3232. NTA supports S.3233. These bills extend and modify duty suspensions on wool products, wool research fund, and wool duty refunds, programs that have been in force since 2000 and which, taken together have provided significant relieve to the domestic wool textile and apparel industry.

**NTA supports S.3240** a bill to clarify the tariff treatment of textile parts of seats and other furniture.

Cut pieces of fabric for use as furniture upholstery are classified as furniture parts under headings 9401 or 9403 of the Harmonized Tariff Schedule of the U.S. They are duty-free, in contrast to the duty on fabric in roll form, which range from 7 to 17 percent depending on fabric type.

This duty circumvention is severely damaging to U.S. upholstery fabric manufacturers. In 2005 the U.S. imported \$1.2 billion in textile parts for chairs and other furniture, of which \$811 million were of Mexican origin (for automobile seats) and \$336 million were of Chinese origin (for home

furnishings). While it is not possible to calculate precisely the loss in tariff revenue to the U.S. treasury due to this duty circumvention, it is undoubtedly several tens of millions of dollars annually.

The tariff schedule does not define what operations must be performed on fabric to transform it into furniture parts. Currently U.S. Customs and Border Protection classifies fabric as a furniture part even if it has undergone the very minimal further processing of cutting. We believe that the mere cutting of fabric should not be considered transforming operation for classification in HTSUS headings 9401 and 9403.

The design of this bill is to establish a reasonable definition of textile furniture parts based on substantial transformation. The National Textile Association endorses this effort. In addition, Senator Elizabeth Dole and Senator Rick Santorum have joined Senator Chafee in efforts to challenge this misclassification.

The NTA Upholstery Fabrics Committee, at the meeting held on Tuesday, April 11, 2006

VOTED to endorse the efforts of Senator Lincoln Chafee of Rhode Island to correct the misclassification of upholstery fabric as furniture parts and to contact their members of Congress and urge them to support Senator Chafee's efforts. The members of the Upholstery Fabrics Committee reiterated that misclassification of upholstery fabrics is a major issues which is seriously damaging U.S. producers of upholstery fabrics.

The NTA Board of Government, meeting later the same day, likewise

VOTED to support efforts to correct the misclassification of upholstery fabrics. Noting the seriousness of the issue, as emphasized by the members of the Upholstery Fabrics Committee, the NTA Board of Government directed the staff to exert the utmost energies in pushing for a legislative or administrative correction to the problem of misclassification of upholstery fabrics.

NTA supports S.3252 NTA supports S.3264 NTA supports S.3265 NTA supports S.3266

To the best of our knowledge and belief there is no domestic source for this rayon.

**NTA has no objection to S.3344** a bill to provide relief for the cotton shirt industry. This is an alternative version of S.738; NTA opposes S.738.

**NTA supports S.3395.** To the best of our knowledge and belief there is no domestic source for this rayon.

NTA supports S.3434.

NTA supports S.3435.

NTA supports S.3436.

**NTA supports S. 3645.** To the best of our knowledge and belief there is no domestic source for this rayon.

Finally, from the list published at <a href="http://finance.senate.gov/sitepages/2006MTB.htm">http://finance.senate.gov/sitepages/2006MTB.htm</a> we have identified additional bills that may be of interest to domestic U.S. textile producers but regarding which we are not making comments at this time. We may be filing additional comments before the August 15th deadline. Our silence at this time regarding the following bills should not be taken as an indication of domestic industry assent.

S.541	S.3102	S.3236	S.3402
S.2647	S.3103	S.3241	S.3403
S.2648	S.3105	S.3242	S.3479
S.3070	S.3110	S.3362	S.3493
S.3071	S.3123	S.3393	S.3494
S.3097	S.3125	S.3394	S.3556
S.3098	S.3126	S.3396	S.3641
S.3099	S.3127	S.3397	S.3643
S.3100	S.3150	S.3400	S.3644
S.3101	S.3164	S.3401	

Thank you for your consideration of these comments.

Sincerely yours,

David Trumbull
Director, Member Services