



December 4, 2009

The Honorable Max Baucus, Chair
The Honorable Charles Grassley, Ranking Member
Senate Finance Committee
219 Dirksen Senate Office Building
Washington, DC, 20510
E: mtb2009@finance-dem.senate.gov

RE: 2009 MTBs on Apparel, Footwear, Textiles & Related Products

Dear Chairman Baucus and Ranking Member Grassley:

On behalf of the American Apparel and Footwear Association (AAFA) – the national trade association representing the apparel and footwear industries, and their suppliers – I am writing to comment on several bills that are proposed to be included in a package of Miscellaneous Tariff Bills (MTB) per a request for comments by the Committee several weeks ago.

On the whole, AAFA supports reduction in duties on products that provide U.S. manufacturers with increased access to foreign inputs no longer available in the United States. Similarly, we support duty reductions that provide U.S. consumers benefits through greater choices and lower prices.

Comments on specific bills listed in the Committee solicitation request follow:

Certain Footwear

S. 1786	S. 1908	S. 1920	S. 2344	S. 2428	S. 2434	S. 2527	S. 2543
S. 1823	S. 1915	S. 1935	S. 2422	S. 2429	S. 2444	S. 2528	S. 2544
S. 1824	S. 1916	S. 2107	S. 2423	S. 2430	S. 2445	S. 2529	S. 2545
S. 1905	S. 1917	S. 2108	S. 2425	S. 2431	S. 2524	S. 2530	
S. 1906	S. 1918	S. 2112	S. 2426	S. 2432	S. 2525	S. 2531	
S. 1907	S. 1919	S. 2343	S. 2427	S. 2433	S. 2526	S. 2542	

AAFA **strongly supports** these bills. AAFA is not aware of any domestic production of these footwear articles.

Moreover, in the few cases where these bills covered 8-digit HTS categories of footwear where there is still U.S. production, the measures were carefully crafted and refined through negotiations with the domestic industry to ensure that they do not affect any current or potential domestic production of footwear. Further, many of these measures represent extensions of expiring footwear provisions that have become critical to many AAFA members.

Note: On bills S. 1915, S. 1916, and S. 2107, AAFA strongly supports these measures only if the bills are structured as per the subsequent agreement between the domestic industry and importers. Under that agreement, the duty suspension should only benefit footwear under these provisions with an FOB value of \$10 or less.

Certain Knit-to-Shape Sweaters

S. 2578	S. 2581	S. 2584	S. 2587	S. 2590	S. 2593
S. 2579	S. 2582	S. 2585	S. 2588	S. 2591	S. 2602
S. 2580	S. 2583	S. 2586	S. 2589	S. 2592	

AAFA ***strongly supports*** these bills. AAFA is not aware of any domestic production of these types of sweaters.

In fact, in 2005, when a new system of transitional import quotas were imposed on China through a bilateral Memorandum of Understanding (MOU), the U.S. Committee for the Implementation of Textile Agreements (CITA) determined that imports of knit-to-shape (looped and linked) sweaters, which are technically classified as knit tops (a quota category), did not cause domestic market disruption. These products were subsequently exempted from the quotas established under the MOU.

Certain Medical Textiles

S. 2348 and S. 2383

AAFA ***strongly supports*** these bills. AAFA is not aware of any domestic production of these medical textiles.

These bills are just two examples of medical textiles where these is not domestic production, yet the duties on imports of these products have the net of effect of raising the cost of healthcare while benefitting no one.

Certain Fibers, Camel Hair, and Yarns

S. 1705	S. 1999	S. 2061	S. 2220	S. 2227	S. 2400	S. 2406	S. 2518
S. 1706	S. 2001	S. 2171	S. 2221	S. 2228	S. 2401	S. 2416	S. 2520
S. 1722	S. 2004	S. 2172	S. 2222	S. 2229	S. 2402	S. 2417	S. 2674
S. 1941	S. 2005	S. 2173	S. 2223	S. 2230	S. 2403	S. 2418	S. 2675
S. 1942	S. 2006	S. 2191	S. 2224	S. 2326	S. 2404	S. 2419	S. 2676
S. 1943	S. 2011	S. 2219	S. 2226	S. 2328	S. 2405	S. 2420	

AAFA ***strongly supports*** these bills. AAFA is not aware of any domestic production of these textiles.

Certain Miscellaneous Items

S. 1989	S. 1991	S. 1994	S. 2054	S. 2613	S. 2617
S. 1990	S. 1993	S. 2053	S. 2058	S. 2614	

AAFA ***strongly supports*** these bills. AAFA is not aware of any domestic production of these items.

AAFA thanks you for your consideration of the above mentioned legislation. Please contact Nate Herman of my staff at nherman@apparelandfootwear.org or 703.797.9062 if you have any questions.

Sincerely,



Kevin M. Burke
President & CEO