



ISO 9001:2008  
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## Cellusuede Products, Inc.

Committee on Ways and Means  
US House of Representatives  
1102 Longworth House Office Building  
Washington, DC 20510

RE: NCTO Opposition to H.R. 4486, 4487, letters of 6/15/2012

Dear Committee Staff:

Cellusuede Products, Inc. is a manufacturer of flock fibers located in Rockford, IL. The raw material fiber configuration we use in our flock manufacturing process is called tow, defined as a bundle of continuous individual fiber filaments.

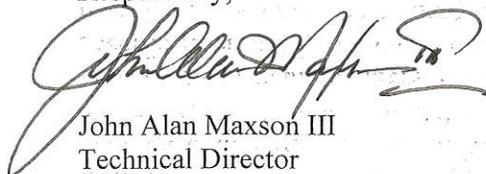
We feel we must take issue with the NCTO objections to the introduction of H.R. 4486 and 4487. These objections seem to take the position that all polypropylene and polyester fibers will be affected by the tariff reduction. On the contrary, the definitions and descriptions of the materials covered by the bills are very clear and the very specific. Both bills reference their individual fiber types as "tow bundles comprised of 300,000 to 400,000 individual filaments". Fiber in tow form is the primary raw material used by flock manufacturers to produce flock fibers in specific and precise cut lengths. This is a very specific fiber configuration that requires a specially designed manufacturing process that very few fiber manufacturers have the willingness or the capability of implementing, due to both the difficulty in producing fiber in tow form, and the relative low volume of tow products used by the flocking industry.

It should be noted that neither bill applies to any other form of the fibers in question, including staple, filament, yarns, threads and so on, that make up the vast majority of the two fibers' mainstream applications. It should also be noted that there are currently no domestic fiber producers manufacturing and selling polypropylene or polyester fibers in tow form.

Based on the lack of specificity and accuracy of the NCTO's objections to H.R. 4486 and 4487, we ask that those objections be dismissed based on the fiber descriptions contained in the two bills, and based on the lack of domestic availability of polypropylene and polyester fiber in tow form.

Thank you for the opportunity to respond to the opposition of the NCTO to the introduction of H.R. 4486 and H.R. 4487. We look forward to a fair and equitable response.

Respectfully,



John Alan Maxson III  
Technical Director