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The Honorable Philip Crane  
Chairman, Subcommittee on Trade  
Committee on Ways and Means  
United States House of Representatives  
1102 Longworth House Office Building  
Washington, DC 20515

May 31, 2002

Dear Mr. Chairman:

On May 21 I wrote to the Committee in behalf of the Rubber and Plastic Footwear Manufacturers Association (RPFMA) objecting to two miscellaneous duty suspension bills, H.R. 4158 and H.R. 4279.

On May 23 Congressman Ryun, the sponsor of H.R. 4158, introduced H.R. 4848, a bill which satisfactorily takes into account the objections which the RPFMA had posed to H.R. 4158. In light of the introduction of H.R. 4848, the RPFMA assumes that H.R. 4158 is for all practical purposes no longer being considered by the Subcommittee on Trade. If this assumption is correct, our objection to H.R. 4158 is no longer operative and we will not pose an objection to the passage of H.R. 4848.

Our objection to H.R. 4279, set forth in our May 21 letter, will remain in effect unless or until that bill is amended to meet our objections.

Respectfully yours,

Mitchell J. Cooper  
Counsel  
Rubber and Plastic Footwear  
Manufacturers Association

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Chairman  
Ways and Means Committee  
United States House of Representatives  
1102 Longworth House Office Building  
Washington, DC 20515

May 21, 2002

Dear Mr. Chairman:

I am writing to you in behalf of the Rubber and Plastic Footwear Manufacturers Association (RPFMA), the trade association representing domestic producers of fabric-upper footwear with rubber or plastic soles, protective footwear, and slippers, as well as suppliers to those manufacturers. The names and locations of RPFMA's members are attached hereto.

For the reasons set forth below, the RPFMA objects to the following two miscellaneous duty suspension bills, **H.R. 4158** and **H.R. 4279**:

H.R. 4158 would accelerate the remaining seven years of duty phase-out in the Caribbean for a substantial number of rubber footwear categories in Chapter 64 of the Harmonized Tariff System. Prior to the passage of CBI II, annual rubber footwear imports from the Caribbean to the United States totaled no more than 200,000 pair. With the elimination of duties on such footwear on condition that components come from the U.S., imports rapidly increased to about five million pair in 2001. This provision for duty-free treatment was, in turn, amended by the recent sub-Saharan-CBI bill, which made the NAFTA phase-out timetable applicable to Caribbean footwear, regardless of the source of components. For rubber footwear, this means that there are approximately seven years left before duties go to zero. It must be borne in mind that this provision for the Caribbean was adopted so as to create parity between the Caribbean and Mexico. H.R. 4158 would have the effect of upsetting that parity. What is more significant for the domestic industry, however, is the fact that the surge in imports from the Caribbean would be intensified with no reciprocal benefit either to the domestic rubber footwear industry or to any other segment of the economy. Moreover, just as NAFTA became a precedent for the CBI, so too would the accelerated elimination of duties from the Caribbean be bound to become a precedent in the ongoing free trade negotiations with Chile and with countries affected by the FTAA. In short, the current CBI acceleration should be permitted to run its course without the unfortunate mischief that would be created were H.R. 4158 to be adopted.

As to H.R. 4279, the concern of the RPFMA is that that bill, as presently written, is too broad to be assured of its limitation to boots for horseback riding. If that part of the bill which reads "...are suitable for horseback riding..." were changed to "...are principally used for horseback riding...", the RPFMA would withdraw its objection.

Rubber footwear is an industry sorely beset by imports, which currently take in excess of 90% of the domestic market for fabric-upper rubber-soled footwear and slippers, and in excess of 60% of the domestic market for protective footwear. This industry could ill afford further incursions into our market which would take place were H.R. 4158 to become law, and if the present loose wording of H.R. 4279 were to remain in that bill.

Respectfully submitted,

Mitchell J. Cooper  
Counsel, Rubber and Plastic  
Footwear Manufacturers  
Association

enc.

## RPFMA Companies

American Steel Toe Company  
South Lynnfield, NJ

Apex Mills Corporation  
Inwood, NY

Bixby International Corporation  
Newburyport, MA

Draper Knitting Co., Inc.  
Canton, MA

Emtex, Inc.  
Chelsea, MA

Genfoot, America, Inc.  
Littleton, NH

New Balance Athletic Shoe, Inc.  
Boston, MA

Norcross Safety Products  
Rock Island, IL

Onguard Industries  
Belcamp, MD

Packaging Corporation of America  
Cutchogue, NY

S. Goldberg & Co., Inc.  
Hackensack, NJ

Sheehan Sales Associates  
Salem, MA

Tingley Rubber Corporation  
South Plainfield, NJ

Worthen Industries Inc.  
Nashua, NH

United Shoe Machinery Corporation  
Wilmington, MA