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Mr. Douglas Bell
Chair, Trade Policy Staff Committee

Via Electronic Filing

RE: Request for Comments on the Proposed Transatlantic Trade and Investment Partnership ("TTIP") agreement with the European Union (Docket No: USTR-2013-0019)

Dear Mr. Bell:

I write in response to the Request for Comments Concerning Proposed Transatlantic Trade and Investment Agreement published in the Federal Register on April 1, 2013 (78 Fed. Reg. 19566, April 1, 2013). In that Request the Trade Policy Staff Committee Chair invited comments, in particular, seeking comments regarding seventeen trade topics set forth as "a" through "q." My comments related to topics "b," "f" and "m."

(b) economic costs and benefits to U.S. producers and consumers of removal of tariffs and removal or reduction in non-tariff barriers on articles traded with the EU;

A 2009 study by the European research and consulting firm Ecorys found that non-tariff barriers ("NTBs") added 19.2 percent to the cost of European textile and clothing articles imported into the U.S. The added NTB cost for U.S. textiles and clothing exported to the E.U. was found to be 16.7 percent. Some of the so-called NTBs, such as country-of-origin labeling (addressed in response to "f" below) and domestic sourcing requirements for certain U.S. government procurement (addressed at "m" below) serve important consumer protection and national security functions and should not be sacrificed for a cheaper flow of goods. But in many other areas harmonization of rules could result in cost savings which could benefit U.S. and E.U. producers and consumers.

(f) opportunities for greater transatlantic regulatory compatibility, including concrete ideas on how greater compatibility could be achieved in a particular economic sector, without diminishing the ability of the United States to continue to meet legitimate regulatory objectives, for example with respect to health, safety and the environment, and which sectors should be the focus of such efforts;

The Textile Fiber Products Identification Act ("Textile Act"), 15 U.S.C. 70-70k, and the Wool Products Labeling Act of 1939 ("Wool Act"), 15 U.S.C. 68-68j, have, for many decades assisted

American consumers in making informed choices regarding purchases of textile and wool products by requiring accurate and concise fiber content labeling on such products. While harmonization of labeling requirement could result in significant cost-savings for manufacturers, traders, and retailers, I urge U.S. negotiators to resist any weakening of these important consumer protections measures. Rather, the U.S. should seek to have the European Union come up to U.S. standards with regard to country-of-origin labeling and labeling of wool products, including the 2006 amendments to the Wool Act which gave greater clarity to the term "cashmere" and the use of "Super 100s" and such labeling of men's wool suits.

(m) relevant government procurement issues, including coverage of any government agencies or state-owned enterprises engaged in procurements of interest, that should be addressed in the negotiations;

Since 1941 the Berry Amendment has worked to assure that America's ability to defend herself will never be impaired by an interruption of the supply of vital textile and clothing resources for our men and women in uniform by requiring domestic sourcing of certain textile and clothing acquisition by the Department of Defense. The Kissell amendment extended similar requirements to certain textile and clothing acquisition by the Department of Homeland Security. The European Apparel and Textile Confederation ("EURATEX"), last month, issued a position paper on E.U.-U.S. trade relations, stating "strong support" for a free trade agreement between the U.S. and the E.U." in which they EURATEX called for opening those Department of Defense and Department of Homeland Security acquisitions to European producers in the TTIP, stating:

"This measure restricts the access to Public Procurement creating discrimination between US and Non-US products penalizing in particular EU T&C companies considering that we are highly competitive in this field and the world leaders when it comes to Technical Applications including also special Garments. So any initiative to boost trade between the EU and the US in our sector needs to properly address this issue."

I strong urge U.S. negotiators to reject any effort to weaken the Berry Amendment and Kissell Amendment.

Yours,

A handwritten signature in black ink, appearing to read "David Trumbull", written in a cursive style.

David Trumbull
Principal, Agathon Associates