



May 6, 2013

Mr. David Weiner
Deputy Assistant U.S. Trade Representative for Europe
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508
Submitted electronically via www.regulations.gov

RE: Transatlantic Trade and Investment Partnership (78 FR 62, pp 19566-19568;
Docket ID: USTR-2013-0019)

Dear Mr. Weiner:

On behalf of INDA, Association of the Nonwoven Fabrics Industry, I would like to thank the Office of the United States Trade Representative for the opportunity to provide input regarding the United States interests and priorities in the Transatlantic Trade and Investment Partnership (TTIP).

By way of background, INDA is the internationally recognized trade association of the nonwoven fabrics industry, a \$7 billion dollar business in the United States and another \$30 billion overseas. Nonwovens are ubiquitous and are utilized in scores of applications serving a broad range of sectors including: baby diapers and wipes, femcare products, apparel, automotive/transportation, consumer products, electronics, filtration, furnishings, construction, hygiene, packaging and medical/healthcare. For your information, I have attached a list of various nonwoven products and corresponding Harmonized Tariff Schedule (HTS) codes and descriptions.

INDA represents the entire value-chain of this dynamic industry. Its members include manufacturers of nonwoven roll goods (classified under HTS 5603), suppliers of raw materials and additives, machinery and equipment manufacturers, those who convert nonwovens into finished products, as well as academic institutions, consultants and other industry groups. Many INDA member companies are global entities including numerous *Fortune 100* companies such as Kimberly-Clark, Procter & Gamble, and Exxon Mobil as well as a number of smaller and medium-sized U.S. manufacturers. You may learn more about INDA, its members and the industry by visiting: www.inda.org.

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The nonwoven fabrics industry’s diverse array of products, continuous innovation, and adaptability have enabled it to remain a growing U.S. business while traditional textile businesses have migrated beyond U.S. borders. The U.S. nonwovens industry is globally competitive and international trade represents a key piece of that success. INDA supports the pursuit of U.S. free trade pacts because it views them as a chance to correct existing inequities stemming from previously negotiated trade deals and to eliminate non-tariff barriers, all of which will help the industry further its reach into global markets.

INDA is particularly enthusiastic about the prospect of a U.S. trade pact with the European Union, which is already an important export destination as well as a source of needed imports. In recognition of this exciting opportunity, INDA and its European counterpart, the European Disposables and Nonwovens Association (EDANA) recently formed a joint International Trade and Trends Advisory Board (T & T Board). The aim of the T & T Board will be to work to advance trade policy that promotes open markets and the growth of the global nonwovens industry, starting with the TTIP negotiations.

In his March 20, 2013 Congressional notification letter, Ambassador Demetrios Marantis notes that an “ambitious, comprehensive and high-standard TTIP can generate new business and employment by significantly expanding trade and investment opportunities in the United States and the EU.”¹

INDA agrees that the economic potential of this free trade deal is great. However, in order to achieve these goals, the TTIP must incorporate certain key elements: 1) ambitious market access obligations; 2) stringent intellectual property standards; and 3) appropriate regulatory cooperation provisions.

Ambitious Market Access Obligations

INDA’s primary concern at present centers on tariff-related market access due to the fact that all U.S. duties on nonwoven roll goods (HTS 5603) were phased out during the Uruguay Round of global trade negotiations. This means that while the United States allows nonwoven roll goods from our trading partners to access the American market duty-free, most of these nations, including the European Union, continue to charge tariffs on U.S. exports of these goods.

INDA believes these disparities have contributed to a significant narrowing of the gap between U.S. imports and exports of nonwoven roll goods (as measured in kilograms) as reflected below.

Table 1: U.S. Trade of Nonwoven Roll Goods (HTS code 5603, aggregated)			
	1996	2012	% Change (1996-2012)
U.S. Exports (Mil. kg)	104.0	318.6	206.4
U.S. Imports (Mil. kg)	39.8	195.7	392.3

¹ “Letter Notifying Congress of the President’s Intent to Enter into Negotiations with the European Union on the Transatlantic Trade and Investment Partnership.” 20 March 2013.
<http://www.ustr.gov/sites/default/files/03202013%20TTIP%20Notification%20Letter.PDF>.

As Table 1 shows, while the United States still exports more nonwoven roll goods than it imports, the rate of import growth has nearly doubled that of export growth since 1996. This is a significant reversal from the early 1990s, when U.S. exports of nonwoven roll goods were 2-3 times greater than U.S. imports. INDA is concerned that at this rate, imports of nonwoven roll goods to the U.S. will exceed our exports within the next few years.

This tariff disparity affects our industry’s ability to penetrate the European market as well. Currently, the EU maintains a 4.3 percent duty on nonwoven roll goods while European roll goods coming into the U.S. face no tariffs whatsoever. The impact of this imbalance on U.S. exports is stark.

	1996	2012	% Change (1996-2012)
U.S. Exports (Mil. kg) to EU	22.6	35.0	55.2
U.S. Imports (Mil. kg) from EU	9.8	52.4	432.6

As Table 2 shows, U.S. imports of nonwovens roll goods from the EU have expanded by more than 432 percent since 1996 while U.S. exports to Europe have grown a little more than 55 percent during that same time. In fact, even in 2012, when overall European exports precipitously declined as a result of the region’s economic crisis, the EU still exported some 33 percent more nonwoven roll goods to America than the U.S. sent to Europe (52.4 million kg. versus 35 million kg.).

It is worth noting, however, that while the *volume* of U.S. roll goods going to the EU was substantially lower than that of EU imports last year, the *values* were nearly identical, hovering around \$320 million for each. This suggests that if the TTIP were to eliminate the unfair and needless advantage that the EU currently enjoys, U.S. roll goods manufacturers and the U.S. economy could expect significant gains.

With this in mind, INDA is calling upon U.S. negotiators to seek the immediate elimination of the EU’s 4.3 percent duties charged on U.S. nonwoven roll goods upon the TTIP’s entry into force. It should be noted that this position is also supported by INDA’s European counterpart EDANA, which is asking EU trade officials for “fast track” elimination of the 4.3 percent import tariff on U.S. nonwoven roll goods.

Separately, INDA also calls upon negotiators to prioritize duty elimination for vital manufacturing inputs that are not available domestically and could be provided by the European Union. A prime example is viscose rayon staple fiber (HTS 5504.10), which is used in scores of nonwoven and other applications, and has not been produced in North America for years. One of the main suppliers of this high-demand fiber is located in the European Union. Unfortunately, U.S. manufacturers are currently paying a 4.3 percent tariff on this fiber due to another lapse in the increasingly unreliable Miscellaneous Tariff Bill, and there is no clear sign when or even if this critical relief will be reinstated. To ensure that U.S. manufacturers maintain their competitive position, U.S. duties on rayon and other crucial manufacturing inputs that are not available domestically but can be sourced from the European Union must be eliminated immediately upon the TTIP’s entry into force.

More generally speaking, as is the case with any free trade agreement, tariff elimination benefits guaranteed under the TTIP have the potential to be significantly watered-down should both parties not be held to the same level of ambition when it comes to duty phase-out requirements. INDA urges U.S. negotiators to include provisions guaranteeing equally ambitious tariff phase-out obligations for both the United States and the European Union.

Stringent Intellectual Property Standards

Nonwoven fabrics are broadly defined as sheet or web structures bonded together by entangling fiber or filaments (and by perforating films) mechanically, thermally, or chemically. The manufacturing process is highly efficient and uses state of the art equipment requiring significant capital investment. The end result is engineered fabrics that provide specific functions such as absorbency, liquid repellency, resilience, stretch, softness, strength, flame retardancy, washability, cushioning, filtering, bacterial barriers and sterility and create innovative possibilities for a broad range of industries.

Today, innovations in nonwoven fabrics are growing as rapidly as the demand for them, making technological change and product development essential to remaining globally competitive and stringent intellectual property protections absolutely crucial to our industry. In his March 20, 2013 letter to Congress, Ambassador Marantis states that a key objective for the TTIP will be “to obtain, consistent with U.S. priorities and objectives, appropriate commitments that reflect the shared U.S.-EU objective of high-level IPR protection and enforcement...”²

Although we believe the European Union nations generally maintain strong intellectual property protections, we have concerns about continual IPR protection/enforcement challenges in numerous EU Member States as detailed in the United States *2013 National Trade Estimate Report on Foreign Trade Barriers*. Although many of the instances the report cites focus on challenges related to internet piracy, INDA is concerned to see persistent challenges related to patent/trademark protection and general IPR enforcement issues in countries like Bulgaria, Czech Republic, Greece, Malta and Romania.³

Although the European Union may encounter challenges policing the intellectual property protection activities of its Member States, any country entering into a free trade agreement with the United States must provide protections on par with those provided by our government. INDA urges U.S. negotiators to fulfill Ambassador Marantis’ pledge to use the TTIP talks to seek “new opportunities to advance and defend the interests of U.S. creators, innovators, businesses, farmers and workers with respect to strong protection and effective enforcement of intellectual property rights, including their ability to compete in foreign markets.”⁴

² “Letter Notifying Congress of the President’s Intent to Enter into Negotiations with the European Union on the Transatlantic Trade and Investment Partnership.” 20 March 2013.
<<http://www.ustr.gov/sites/default/files/03202013%20TTIP%20Notification%20Letter.PDF>>.

³ “2013 National Trade Estimate Report on Foreign Trade Barriers”. Office of the United States Trade Representative. March 2013. 144-147.

⁴ “Letter Notifying Congress of the President’s Intent to Enter into Negotiations with the European Union on the Transatlantic Trade and Investment Partnership.” 20 March 2013.
<<http://www.ustr.gov/sites/default/files/03202013%20TTIP%20Notification%20Letter.PDF>>.

Appropriate Regulatory Cooperation Provisions

The final report of the U.S.-EU High Level Working Group (HLWG) on Jobs and Growth notes that a key shared objective of the TTIP should be “to identify new ways to prevent non-tariff barriers from limiting the capacity of U.S. and EU firms to innovate and compete in global markets.” One way to accomplish this, the HLWG states, is to “strengthen upstream cooperation by regulators” and “to reduce costs associated with regulatory differences by promoting greater compatibility, including, where appropriate, harmonization of future regulations...”⁵

INDA supports the overall goal of enhancing U.S.-EU regulatory cooperation and harmonization when it appears it could reduce regulatory costs and burdens that are hindering economic growth. However, cooperation and harmonization must not mean simply adopting the strictest regulatory standard in place. The third-party testing requirements imposed under the Consumer Product Safety Improvement Act (CPSIA), for example, have inflicted significant resource challenges on countless manufacturers with unclear benefit and a disproportionate negative impact on smaller businesses. The EU’s Registration, Evaluation, Authorization and Restriction of Chemical Substances (REACH) regulation, meanwhile, has imposed significant testing/registration costs and regulatory burdens that have prevented many U.S. manufacturers from entering the European market.

Regulatory provisions in the TTIP should remove unnecessary barriers to growth, not create new ones. INDA supports HLWG recommendations to use the agreement to create formal infrastructure that promotes transparency and provides an opportunity for meaningful dialogue throughout the development of regulations that could impact trade between the two partners.

However, the U.S. and EU governments must be allowed to retain sovereignty to tailor regulations to suit the needs of their people. Any regulatory coherence/cooperation provisions included in the TTIP must remain loyal to the intent of the pact: to increase U.S. and EU economic prosperity.

Conclusion

If negotiated successfully, an ambitious, high-standard TTIP will create the world’s largest free trade area and generate more than \$5 trillion in trade, investment and sales. It will further deepen an already highly productive U.S.-EU trade and economic relationship and serve as a platform to grow into new markets that were previously inaccessible. The opportunities for U.S. international competitiveness, jobs and growth are enormous.

The TTIP is also an outstanding opportunity for the nonwoven fabrics industry, providing the ideal stage to eliminate tariff imbalances that have unfairly hindered its growth, and to address non-tariff impediments that threaten all U.S. manufacturers. INDA asks U.S. trade officials to maintain clearly defined objectives that hold the U.S. and European Union to an equal level of ambition and to aggressively pursue and integrate stakeholder input to ensure the TTIP achieves

⁵ “Final Report of the High Level Working Group on Jobs and Growth.” 11 February 2013.
<<http://www.ustr.gov/about-us/press-office/reports-and-publications/2013/final-report-us-eu-hlwg>>.

its ambitious goals. We look forward to working with USTR and other U.S. trade officials throughout this exciting process.

On behalf of INDA, I thank you for the opportunity to submit these comments. Please feel free to contact me should you have questions or need additional information. I can be reached at (703) 521-0545 or at jfranken@inda.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica Franken". The signature is fluid and cursive, with the first name being more prominent.

Jessica Franken
Director of Government Affairs

**HARMONIZED TARIFF SCHEDULE CODES FOR
NONWOVEN FABRICS &
CONVERTED PRODUCTS USING NONWOVEN FABRICS**

<u>HTS Code</u>	<u>HTS Product Description</u>	<u>General Product Type</u>
3005.10.10	Adhesive dressings and other articles having an adhesive layer, coated or impregnated with pharmaceutical substances, packed for retail	Healthcare
3005.10.50	Adhesive dressings and other articles having an adhesive layer, packed for retail for medical, surgical, dental, veterinary purposes	Healthcare
3005.90.10	Wadding, gauze, bandages, & similar articles, not having an adhesive layer, coated, impregnated with pharmaceutical substances, for retail	Healthcare
3005.90.50	Wadding, gauze, bandages, and similar articles, not having an adhesive layer, packed for retail for medical, surgical, like purposes	Healthcare
3401.11.50	Soap, n.e.s.o.i.; organic surface-active products used as soap, in bars, cakes, pieces, soap-impregnated paper, wadding, felt, for toilet use	Personal Care & Hygiene
3401.19.00	Soap; organic surface-active products used as soap, in bars, cakes, pieces; soap-impregnated paper, wadding, felt, not for toilet use	Healthcare, Industrial/Military, Household Products,
3918.10.31	Wall or ceiling coverings, with a backing of manmade fibers, greater than 70% by weight of PVC	Construction
3918.10.32	Wall or ceiling coverings, with a backing of manmade fibers, less than or equal to 70% by weight of PVC	Construction
3918.10.40	Wall or ceiling coverings of polymers of vinyl chloride with a backing of textile fibers other than of manmade fibers	Construction

3918.10.50	Wall or ceiling coverings of polymers of vinyl chloride, without a backing of textile fibers	Construction
3918.90.20	Wall or ceiling coverings, with a backing of manmade fibers, of plastics other than polymers of vinyl chloride	Construction
3918.90.30	Wall or ceiling coverings of plastics other than of polymers of vinyl chloride with a backing of textile fibers other than of manmade fiber	Construction
3926.90.57	Belting and belts (except V-belts) for machinery, of plastics, containing predominantly manmade fibers	Industrial/Military
3926.90.59	Belting and belts (except V-belts) for machinery, of plastics, containing textile fibers n.e.s.o.i.	Industrial/Military
4010.12.50, 4010.12.55	Conveyor belts/belting of vulcanized rubber reinforced with textile material, mostly manmade fiber	Industrial/Military
4010.12.90	Conveyor belts or belting of vulcanized rubber reinforced only with textile materials, n.e.s.o.i.	Industrial/Military
4010.19.50, 4010.19.55	Conveyor belts/belting of vulcanized rubber, n.e.s.o.i., combined with textile components in which manmade fibers predominate	Industrial/Military
4010.31.30, 4010.31.60	Endless synchronous transmission belt of vulcanized rubber, circum. 60-180 cm, combined with textile material; manmade fiber predominant	Industrial/Military
4202.11.00	Trunks, suitcases, vanity & all other cases, occupational luggage & like containers, surface of leather, composition or patent leather	Leisure, Travel
4202.12.80	Trunks, suitcases, vanity & attache cases, occupational luggage and similar containers, with outer surface of textile materials n.e.s.o.i.	Leisure, Travel

4202.21	Handbags, with or without shoulder strap or without handle, with outer surface of leather, composition or patent leather, n.e.s.o.i.	Clothing & Apparel
4202.21.60, 4202.21.90	Handbags, with or without shoulder strap or without handle, with outer surface of leather, composition or patent leather, n.e.s.o.i.	Leisure, Travel
4202.31.60	Articles of a kind normally carried in the pocket or handbag, with outer surface of leather, composition or patent leather, n.e.s.o.i.	Leisure, Travel
4202.91.00	Cases, bags and containers n.e.s.o.i., with outer surface of leather, of composition leather or patent leather	Leisure, Travel
4202.92.30	Travel, sports and similar bags with outer surface of textile materials other than of vegetable fibers	Leisure, Travel
4818.20.00	Toilet paper and similar paper, cellulose wadding or webs of cellulose fibers; handkerchiefs, cleansing or facial tissues and towels of paper pulp, paper, cellulose wadding or webs of cellulose fiber	Personal Care & Hygiene
4818.30.00	Toilet paper and similar paper, cellulose wadding or webs of cellulose fibers; tablecloths and table napkins of paper pulp, paper, cellulose wadding or webs of cellulose fiber	Home Furnishings
4818.90.00	Bedsheets and similar household, sanitary or hospital articles of paper, cellulose wadding or webs of cellulose fibers, n.e.s.o.i.	Healthcare, Household Furnishings
4819.50.20	Sanitary food and beverage containers of paper, paperboard, cellulose wadding or webs of cellulose fibers, n.e.s.o.i.	Other
4819.50.40	Packing containers, n.e.s.o.i., of paper, paperboard, cellulose wadding or webs of cellulose fibers	Other

4905.99.00	Maps and hydrographic or similar charts of all kinds, including atlases, wall maps and topographical plans, printed, in other than book form	School & Office
5111.20.05, 5111.30.05, 5111.30.10	Tapestry & upholstery fabrics of carded wool/fine animal hair, mixed mainly or solely with manmade filaments/with manmade staple fibers	Home Furnishings
5601.21.00	Wadding of cotton and other articles of cotton wadding n.e.s.o.i.	Other
5601.22.00	Wadding of manmade fibers and other articles of such wadding n.e.s.o.i	Other
5603.11.10	Nonwovens, whether or not impregnated, coated, covered or laminated, of man-made filaments weighing not more than 25g/m	Other
5603.12.00	Nonwoven fabrics: weighing more than 25g/m ² but not more than 70 g/m ²	Other
5603.13.00	Nowoven fabrics weighing more than 70 g/m ² but not more than 150g/m ²	Other
5603.13.09	Nowoven fabrics weighing more than 70 g/m ² but not more than 150g/m ²	Other
5603.14.30	Nonwoven laminated fabrics weighing more than 150 g/m ² ; impregnated, coated or covered w/ material other than or in addition to rubber, plastics, wood pulp or glass fibers; “imitation suede”	Other
5603.14.90	Nonwoven laminated fabrics weighing more than 150 g/m ² ; impregnated, coated or covered w/ material other than or in addition to rubber, plastics, wood pulp or glass fibers; “imitation suede”	Other
5603.91.00	Nonwovens weighing not more than 25g/m ² ; impregnated, coated or covered w/ material other than or in addition to rubber, plastics, wood pulp or glass fibers; “imitation suede”	Other

5603.92.00	Nonwovens weighing more than 25 g/m ² but not more than 70 g/m ² ; impregnated, coated or covered w/ material other than or in addition to rubber, plastics, wood pulp or glass fibers; “imitation suede”	Other
5603.93.00	Nonwovens weighing more than 70g/m ² but not more than 150 g/m ² ; impregnated, coated or covered w/ material other than or in addition to rubber, plastics, wood pulp or glass fibers; “imitation suede”	Other
5603.94.10	Nonwoven floor covering underlays (not of manmade filaments), weighing >150 g/square m, whether or not impregnated, coated, covered or laminated	Roll Goods, Home Furnishings
5603.94.30	Nonwoven laminated fabrics weighing more than 150 g/m ²	Other
5603.94.90	Nonwovens nesoi (not of man-made filaments), weighing >150 g/square m, whether or not impregnated, coated, covered but not laminated	Other
5704.10.00	Carpet tiles of felt, not tufted or flocked, whether or not made up, having a maximum surface area of 0.3 m ²	Home Furnishings
5704.90.00	Carpets and other textile floor coverings (excluding certain felt carpet tiles) of felt, not tufted or flocked, whether or not made up	Home Furnishings
5803.00.10	Gauze (other than narrow fabrics of heading 5806) of cotton	Healthcare
5803.00.40	Gauze (other than narrow fabrics of heading 5806) of vegetable fibers except cotton	Healthcare
5803.00.50	Gauze (other than narrow fabrics of heading 5806) of manmade fibers	Healthcare
5803.00.90	Gauze (other than narrow fabrics of heading 5806) of other textile materials n.e.s.o.i.	Healthcare

5807.90.05, 5807.90.15	Labels, in the piece, in strips or cut to shape or size, nonwoven, not embroidered, of cotton or manmade fibers, or of other textile materials	Clothing & Apparel
5807.90.20	Badges & similar articles (except labels) of textile materials, not woven, not embroidered, in the piece, in strips or cut to shape or size	Clothing & Apparel
5811.00.10, 5811.00.20, 5811.00.30, 5811.00.40	Quilted textile products in the piece (excluding embroidery), of one or more layers assembled with padding, of wool or fine animal hair, or of cotton, or of manmade fibers, or of textile materials n.e.s.o.i.	Household Furnishings
5901.10.10, 5901.10.20	Textile fabrics coated with gum or amylaceous substances, of a kind used for outer covers of books or the like, of manmade fibers or other material	School & Office
5901.90.20	Tracing cloth, prepared painting canvas, buckram and similar stiffened textile fabrics used in hat foundations, of manmade fibers	Clothing & Apparel
5904.90.10	Floor coverings consisting of a coating applied on a textile backing, with a base consisting of needleloom felt or nonwovens	Home Furnishings
5911.31.00, 5911.32.00	Textile fabrics and felts, endless or fitted with linking devices, used for papermaking or similar machines	Industrial/Military
6210.10.20	Garments, not knitted or crocheted, made up of fabrics of heading 5602 or 5603 formed on a base of paper or covered or lined with paper	Clothing & Apparel, Healthcare
6210.10.50	Nonwoven disposable apparel designed for hospitals, clinics, labs or contaminated area use, made up of fabric of 5602/5603, not formed or lined with paper, not knitted/crocheted	Personal Care & Hygiene

6210.10.70	Disposable briefs and panties designed for one time use, made up of fabrics of 5602 or 5603, not formed or lined with paper, not knitted/crocheted	Personal Care & Hygiene
6210.10.90	Garments, n.e.s.o.i., made up of fabrics of heading 5602 or 5603, not formed or lined with paper, not knitted/crocheted	Clothing & Apparel, Healthcare
6210.20, 6210.30, 6210.40, 6210.50	Garments, similar to 6201.11-6201.19, or other outerwear whether or not of manmade fibers, outer surface impregnated, whether or not coated etc. with rubber/plastic, underlying fabric completely obscured, not knitted/crocheted	Clothing & Apparel
6211.20	Ski suits of other textile materials, not knitted/crocheted	Clothing & Apparel
6211.39, 6211.49	Coveralls, washsuits, vests and similar apparel of textile material or <70% silk/silk waste n.e.s.o.i., not knitted	Clothing & Apparel
6212.10	Brassieres/bras ... not knitted	Clothing & Apparel
6213.20, 6213.90	Handkerchiefs of manmade fibers or other fabrics, not knitted/crocheted	Clothing & Apparel
6217.10	Accessories of manmade fibers, not knitted or crocheted	Clothing & Apparel
6217.90	Parts of garments n.e.s.o.i., manmade fibers, not knitted or crocheted	Clothing & Apparel
6305.32.00	Flexible intermediate bulk containers of a kind used for packing goods, of manmade textile materials	Other
6305.33.00	Other sacks/bags for packing goods, of manmade textile material (not flexible intermediate bulk containers), of polyethylene or polypro. strip or the like	Other
6306.12, 6306.11-19	Tarpaulins of synthetic fibers	Leisure, Travel
6306.22, 6306.21-29	Tents of synthetic fibers	Leisure, Travel
6306.29.00	Tents of textile materials other than of cotton or synthetic fibers	Leisure, Travel

6307.10.20	Floor cloths, dishcloths and similar cleaning cloths of textile materials (except dustcloths, mops cloths and polishing cloths of cotton)	Household Products
6307.90.30	Made-up labels of textile materials	Clothing & Apparel
6307.90.60	Surgical drapes of fabric formed on a base of paper or covered or lined with paper	Healthcare
6307.90.68	Surgical drapes of spunlaced or bonded fiber fabric disposable surgical drapes of manmade fibers	Healthcare
6307.90.72	Surgical drapes, n.e.s.o.i., not spunlaced or bonded fiber fabric	Healthcare
6307.90.85	Wall banners, of manmade fibers	School & Office
6403.59, 6403.91, 6403.99	Footwear with outer soles of rubber/plastics/composition leather & uppers of leather	Clothing & Apparel
6405.20	Footwear, n.e.s.o.i., with soles and uppers of wool felt	Clothing & Apparel
6405.90.20	Disposable footwear, n.e.s.o.i., designed for one-time use	Healthcare, Clothing & Apparel, Industrial/Military
6406.90.90	Parts of footwear, n.e.s.o.i.; removable insoles, heel cushions, etc; gaiters, leggings, etc, & parts thereof; all the foregoing of materials n.e.s.o.i.	Clothing & Apparel
6502.00.90	Hat shapes, plaited or assembled from strips, not blocked/lined/trimmed & without made brims, not vegetable fibers/vegetable materials/paper yarn, n.e.s.o.i.	Clothing & Apparel
6505.00.01	Hats and headgear of felt, other than of fur felt, made from hat forms and hat bodies of 6501	Clothing & Apparel
6505.00.80	Nonwoven disposable headgear without peaks or visors	Clothing & Apparel

7019.31.00	Nonwoven fiber glass mats	Home Furnishings, Construction
7019.32.00	Nonwoven glass fiber in thin sheets (voiles)	Home Furnishings, Construction
7019.39.10	Nonwoven glass wool insulation products	Home Furnishings, Construction
7019.39.50	Nonwoven glass fiber webs, mattresses, boards and similar articles of nonwoven glass fibers, n.e.s.o.i.	Various
8421.23.00	Oil or fuel filters for internal combustion engines	Automotive
8421.29.00	Filtering or purifying machinery and apparatus for liquids, n.e.s.o.i.	Industrial/Military
8421.31.00	Intake air filters for internal combustion engines	Automotive
8421.39.80	Filtering or purifying machinery and apparatus for gases, other than intake air filters for internal combustion engines or catalytic converters	Industrial/Military
8421.99.00	Parts for filtering or purifying machinery or apparatus for liquids or gases	Industrial/Military
8449.00.10	Finishing machinery for felt or nonwovens and parts thereof	Industrial/Military
8449.00.50	Machinery for making felt hats; blocks for making hats; parts thereof	Industrial/Military
8479.90.41	Parts of vacuum cleaners and floor polishers of subheadings 8479.89.10 and 8479.89.30; parts of carpet sweepers	Home Furnishings
9020.00.90	Parts and accessories of breathing appliances and gas masks, n.e.s.o.i.	Industrial/Military, Healthcare
9401.20.00	Seats, of a kind used for motor vehicles	Automotive
9401.90.10	Parts of seats n.e.s.o.i., for seats of a kind used for motor vehicles	Automotive
9404.10.00	Mattress supports	Home Furnishings
9404.29.10	Mattresses, of cotton	Home Furnishings

9404.29.90	Mattresses (other than of cellular rubber or plastics or of cotton)	Home Furnishings
9404.30.40, 9404.30.80	Sleeping bags	Leisure, Travel
9404.90.10, 9404.90.20	Pillows, cushions and similar furnishings	Home Furnishings
9404.90.80	Articles of bedding & similar furnishings stuffed or internally fitted with any material n.e.s.o.i., of cotton, without embroidery/lace/braid/edging,etc	Home Furnishings
9404.90.85	Quilts, eiderdowns, comforters and similar articles, not of cotton	Home Furnishings
9404.90.95	Articles of bedding & similar furnishings stuffed or internally fitted with any material n.e.s.o.i.	Home Furnishings
9616.20.00	Powder puffs and pads for the application of cosmetics or toilet preparations	Personal Care & Hygiene
9619.00.11	Sanitary napkins and tampons, diapers and diaper liners and similar sanitary articles, of paper pulp	Personal Care & Hygiene
9619.00.15	Sanitary napkins and tampons, diapers and diaper liners and similar sanitary articles, other than of paper pulp	Personal Care & Hygiene
9619.00.21	Sanitary towels and tampons, diapers and diaper liners for babies and similar sanitary articles, of wadding of cotton	Personal Care & Hygiene
9619.00.25	Sanitary towels and tampons, diapers and diaper liners for babies & similar sanitary articles, of wadding of other textile materials, n.e.s.o.i.	Personal Care & Hygiene