



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20580

Division of Enforcement
Bureau of Consumer Protection

February 11, 2004

Ms. Renee L. Hoem
Columbia Sportswear Company
14375 NW Science Park Drive
Portland, Oregon 97229

Re: Request for FTC Staff Opinion concerning Composite Fabrics

Dear Ms. Hoem:

This is in reply to your letter addressed to Donald S. Clark, Secretary of the Commission, requesting a staff opinion regarding the appropriate method for disclosing fiber content for specific types of "composite fabrics." You also request clarification as to how the FTC defines "pile fabric." Before addressing your several questions regarding composite fabrics, let me first discuss the issue of pile fabrics.

As you know, the Federal Trade Commission administers several laws pertaining to labeling, including the Textile Fiber Products Identification Act ("Textile Act"), 15 U.S.C. § 70, and the Rules promulgated thereunder. The Textile Act requires that imported and domestic textile fiber products bear a label or labels setting forth the fiber content, appropriate business name or registered identification number ("RN"), and the country of origin. The Textile Act and the Rules contain several definitions for various terms, but they do not set forth a definition for pile fabrics. However, Textile Rule 303.24 pertains to fiber content disclosure of pile fabrics and gives some examples:

§ 303.24 Pile fabrics and products composed thereof.

The fiber content of pile fabrics or products composed thereof may be stated on the label in such segregated form as will show the fiber content of the face or pile and of the back or base, with percentages of the respective fibers as they exist in the face or pile and in the back or base: Provided, That in such disclosure the respective percentages of the face and back be given in such manner as will show the ratio between the face and the back. Examples of the form of marking pile fabric as to fiber content provided for in this section are as follows:

100% Nylon Pile
100% Cotton Back
(Back constitutes 60% of fabric and pile 40%).

Face -- 60% Rayon, 40% Nylon
Back -- 70% Cotton, 30% Rayon
(Face constitutes 60% of fabric and back 40%).

Likewise, our business guidebook, "Threading Your Way," provides the following information regarding the labeling of pile fabrics: "Fiber content labeling for pile fabrics may be handled in one of two ways. You can state the fiber content for the product as a whole. Or, the fiber content of the pile and backing may be disclosed separately. If the pile and backing are stated separately, the ratio between the two must be given as percentages of the fiber weight of the whole." However, the guidebook does not set forth a definition for pile fabrics.

In your letter, you make specific reference to a Customs ruling that describes pile fabrics, in part, as: "... it is the existence of loops as the fabric comes from the knitting frame, not the presence of an extra yarn, which is a determining factor in classifying pile fabric." (Customs Ruling NY D88452). You provide other information regarding pile fabrics and then ask whether this is the same way that the FTC would define pile fabrics. Although a definition of pile fabric is not set forth in the Textile Fiber Products Identification Act, or the Rules and Regulations thereunder, we can advise you that the Commission staff generally would defer to the Bureau of Customs in this matter. It is our understanding that the Customs Rulings Online Search System (CROSS) contains several rulings regarding pile fabrics, e.g., ruling HQ 966062 (copy attached). The CROSS database is located on the Internet at <http://rulings.customs.gov/>. Commission staff and the business community may use the database as a valuable source of information.

You set forth a series of examples and questions regarding the labeling of composite fabrics, and you define "composite fabrics" as "two separate fabrics which are bonded together or laminated and bonded together." Your examples may be summarized as follows:

Example #2633 – Windstopper Next to Skin fabric. This material consists of a knit pique laminated to a knit tricot, both being 100% polyester.

Example #2635 – Windstopper Classic Fleece fabric. This material consists of a knit jersey mesh (100% polyester) laminated to a knit pile (100% polyester pile and 100% polyester back).

Example #2737 – Schoeller WB-400. This fabric is a woven twill made up of 89% nylon, 11% elastane, bonded to the other fabric which is 97% polyester, 3% elastane knit pile. The percentages by weight of different fibers of the composite fabric would be 48% polyester, 41% nylon, 11% elastane.

Example Garment – Garment made of Track Terry Fleece #2533. This is a knit terry bonded to a knit "pile" (as per Customs' definitions); both sides being 100% polyester.

Commission staff has reviewed your examples and given each one careful consideration. Generally speaking, staff is of the opinion that composite fabrics are subject to “sectional disclosure” whenever the layers are of different fiber content. Three of your four examples involve composite fabrics consisting entirely of polyester. There is no need to do a sectional disclosure for such fabrics, even though some of them may contain pile fabrics, also of 100% polyester. These composite fabrics may be labeled as “100% Polyester.” However, the fourth composite fabric is a woven twill made up of 89% nylon, 11% elastane, bonded to the other fabric which is 97% polyester, 3% elastane knit pile. Textile Rule 303.25 addresses the issue of sectional disclosure, and states:

§ 303.25 Sectional disclosure of content.

(a) Permissive. Where a textile fiber product is composed of two or more sections which are of different fiber composition, the required information as to fiber content may be separated in the same label in such manner as to show the fiber composition of each section.

(b) Mandatory. The disclosure as above provided shall be made in all instances where such form of marking is necessary to avoid deception.

Staff feels that it is almost always necessary to make a sectional disclosure for fiber content whenever there are two or more sections or components of differing fiber composition. Staff is of the opinion that it would be inappropriate to label this composite fabric by its combined overall fiber composition as “48% polyester, 41% nylon, 11% elastane” because such a disclosure would imply to a consumer that each side of the fabric is composed of 48% polyester, 41% nylon, and 11% elastane, even though, in fact, neither side is 48% polyester, 41% nylon, 11% elastane. Some form of sectional disclosure is necessary in order to avoid deception. Thus, part of the sectional disclosure must refer to the pile fabric layer, and the other part of the sectional disclosure must refer to the woven twill in some appropriate manner. For example, the label might state:

Woven Twill: 89% nylon, 11% elastane.
Pile Fabric: 97% polyester, 3% elastane

Again, as noted above, Textile Rule 303.24 allows this type of disclosure for pile fabrics. However, if the pile and backing of the pile are set forth separately, then the ratio between them must also be stated. It is not necessary to use the terms “Woven Twill” or “Pile Fabric,” as set forth above, provided that whatever terms actually are used will provide consumers with meaningful information. For example, depending on the circumstances:

Bonded Fabric:
Green: 89% nylon, 11% elastane.
Black: 97% polyester, 3% elastane .

Ms. Renee L. Hoem - Page 4

In accordance with Section 1.3(c) of the Commission's Rules of Practice and Procedure, 16 C.F.R. § 1.3(c), this is a staff opinion only and has not been reviewed or approved by the Commission or by any individual Commissioner, and is given without prejudice to the right of the Commission later to rescind the advice and, where appropriate, to commence an enforcement action.

In accordance with Section 1.4 of the Commission's Rules of Practice and Procedure, 16 C.F.R. § 1.4, your request for advice, along with this response, will be placed on the public record.

I hope you will find the above information helpful.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Steve Ecklund". The signature is written in a cursive style with a large, stylized initial "S".

Steve Ecklund
Federal Trade Investigator

Enclosure

HQ 966062

March 11, 2003

CLA-2 RR:CR:TE 966062 jsj

CATEGORY: Classification

TARIFF NO.: 6001.22.0000

Mr. Herbert J. Lynch Sullivan & Lynch, P.C.

156 State Street Boston, Massachusetts 02109-2508

Re: Classification; Laminated Warp Knit Pile Fabric; Subheading 6001.22.0000, HTSUSA; Chapter 60, Note 1(c); Chapter 59, Note 1; Country of Origin; 19 C.F.R. 102.21 (c)(2).

Dear Mr. Lynch:

The purpose of this correspondence is to respond to your request dated March 6, 2002, directed to the National Commodity Specialist Division. The correspondence in issue requested, on the behalf of your client, Velcro USA, Inc., a binding classification and country of origin ruling of the merchandise described as laminated warp knit fabric.

This ruling is being issued subsequent to the following: (1) A review of your submission dated March 6, 2002; (2) A review of the Customs Service laboratory report number: **NY 20020351**, dated May 28, 2002; and (3) An examination of the base fabric sample and the laminated fabric sample.

FACTS

The article in issue, identified as laminated warp knit fabric, is formed by laminating a sheet of plastic to a two bar warp knit fabric. The Customs Service Office of Laboratory and Scientific Services, subsequent to examining samples, reported that the lapping movement of the two guide bars moving in unison in the same direction produced an unstable construction with inclined loops.

The lapping movements of the front bar is expressed as 1/0, 1/2, with the lapping movements of the back bar expressed as 1/0, 3/4. The back bar, which pulls the yarn over two rows of stitches before forming a knit stitch, is adjusted in the formation of this fabric to provide less tension. The result is the production of a float that projects upward from the surface of the fabric. The projection of the looped float created by the back guide bar is entirely a function of its relative tension and not any process subsequent to knitting. The fabric has not been brushed.

The yarn used in the formation of the Velcro® fabric is 100 % nylon. It weighs approximately 72.2 grams per square meters. It will be imported in 101.6 centimeter widths. The fabric, subsequent to formation, is laminated with a sheet of polypropylene plastic that is visible to the naked eye. The plastic sheeting is imprinted with differing designs, including those of animals, in different colors.

The production of the finished Velcro® product, the laminated warp knit fabric, is undertaken in the following countries:

Spain: The nylon warp knit fabric is formed on warp knitting machines in rolls that are sixty inches wide.

Germany: The warp knit fabric, subsequent to export from Spain to Germany, is laminated with polypropylene film that had previously been decorated with water-based acrylic motifs appealing to children.

The Customs Service has not been advised whether the nylon yarn is extruded in Spain or whether the polypropylene film is produced in Germany.

ISSUE

What is the classification, pursuant to the Harmonized Tariff Schedule of the United States Annotated, of the above-described laminated warp knit fabric?

What is the country of origin of the laminated warp knit fabric that is knitted in Spain and laminated in Germany ?

LAW AND ANALYSIS

Classification

The federal agency responsible for initially interpreting and applying the Harmonized Tariff Schedule of the United States Annotated (HTSUSA) is the U.S. Customs Service. The Customs Service, in accordance with its legislative mandate, classifies imported merchandise pursuant to the General Rules of Interpretation (GRI) and the Additional U.S. Rules of Interpretation.

General Rule of Interpretation 1 provides, in part, that classification decisions are to be "determined according to the terms of the headings and any relative section or chapter notes." General Rule of Interpretation 1. General Rule of Interpretation 1 further states that merchandise which cannot be classified in accordance with the dictates of GRI 1 should be classified pursuant to the other General Rules of Interpretation, provided the HTSUSA chapter headings or notes do not require otherwise. According to the Explanatory Notes (EN), the phrase in GRI 1, "provided such headings or notes do not otherwise require," is intended to "make it quite clear that the terms of the headings and any relative Section or Chapter Notes are paramount." General Rules for the Interpretation of the Harmonized System, Rule 1, Explanatory Note (V).

The Explanatory Notes constitute the official interpretation of the Harmonized System at the international level. See Joint Explanatory Statement *supra* note 1, at 549. The Explanatory Notes, although neither legally binding nor dispositive of classification issues, do provide commentary on the scope of each heading of the HTSUS. The EN's are generally indicative of the proper interpretation of the headings. See T.D. 89-80, 54 Fed. Reg. 35127-28 (Aug. 23, 1989); *Lonza, Inc. v. United States*, 46 F. 3d 1098, 1109 (Fed. Cir. 1995).

Commencing classification of the laminated warp knit fabric, in accordance with the dictates of GRI 1, the Customs Service examined the headings of the HTSUSA. Heading 6001, HTSUSA, provides for the classification of "[p]ile fabrics, including 'long pile' fabrics and terry fabrics, knitted or crocheted." The principle issue to be addressed by Customs in the classification of this fabric is whether the fabric is "pile." The Explanatory Notes and prior Customs Service ruling letters assist in resolving this question. Explanatory Note 60.01 provides, in part:

Unlike the woven fabrics of heading 58.01, the products of this heading are obtained by knitting. The following methods of production are those mainly used:

a circular knitting machine produces a knitted fabric in which, by means of an additional yarn, protruding loops are formed; afterwards the loops are cut to form pile and thus give a velvet-like surface; a special warp knitting machine knits two fabrics face to face with a common pile yarn; the two fabrics are then separated by cutting to produce two knitted fabrics with a cut pile; textile fibres from a carded sliver are inserted into the loops of a knitted ground fabric as it is formed ("long pile" fabrics); textile yarn to form loops ("imitation terry fabrics") (see General Explanatory Note). Such fabrics have rows of chain stitches on the back of the fabric and they differ from the pile fabrics of heading 58.02, which are characterised by rows of stitches having the appearance of running stitches along the length of the back of the fabric. (Emphasis added).

Customs, relying on EN 60.01, has previously concluded that the processes enumerated in the EN are illustrative, rather than exclusive. The EN specifically states that the methods of production listed are those "mainly used" in the formation of "pile" fabric.

The determinative factor with regards to whether fabric is considered to be "pile" fabric is whether the process utilized results in the production of a fabric with raised loops, not whether the fabric-making process is listed in the Explanatory Note. As stated in **HQ 951374** (Oct. 30, 1992), "if during the weaving or knitting of a fabric, yarns are caused to project from the surface(s) (i.e., the base material) of that fabric creating a 'pile' appearance, that fabric will be considered a pile fabric for the purposes of the HTSUSA...." The Velcro® fabric subject to this classification ruling comports with the requirement that yarns project from the surface of the fabric as the result of the fabric-making process resulting in the production of a "pile" fabric. See generally **HQ 953303** (April 9, 1993); **HQ 953942** (May 7, 1993).

Chapter 60, Note 1(c) provides, with a single exception, that knitted or crocheted fabrics that are impregnated, coated, covered or laminated are classified in Chapter 59, HTSUSA,. The exception set forth in Chapter 60, Note 1(c) states that knitted or crocheted pile fabrics that are impregnated, coated, covered or laminated remain classified in heading 6001, HTSUSA. The Velcro® fabric falls within the exception to Chapter 60, Note 1(c), as it is both a knit pile fabric and laminated. It is, therefore, classified in heading 6001, HTSUSA.

Continuing the classification of the Velcro® laminated warp knit pile fabric, the fabric is classified in subheading 6001.22.0000, HTSUSA. Subheading 6001.22.0000, HTSUSA, provides for the classification of:

Pile fabrics, including "long pile" fabrics and terry fabrics, knitted or crocheted:

Looped pile fabrics:

6001.22.0000 Of man-made fibers.

Counsel for the importer suggests that the fabric is properly classified in heading 5903, HTSUSA. Heading 5903, HTSUSA, provides for the classification of "[t]extile fabrics impregnated, coated, covered or laminated with plastics, other than those of heading 5902." The phrase "textile fabrics" in heading 5903, HTSUSA, is defined in Chapter 59, Note 1. Chapter 59, Note 1 states that "[e]xcept where the context otherwise requires, for the purposes of this chapter the expression "textile fabrics" applies only to the woven fabrics of chapters 50 to 55 and headings 5803 and 5806, the braids and ornamental trimmings in the piece of heading 5808 and the knitted or crocheted fabrics of headings 6002 to 6006." Since the Velcro® fabric is classified in heading 6001, HTSUSA, it is not a "textile fabric" for the purposes of Chapter 59 or heading 5903, HTSUSA.

Country of Origin

The Uruguay Round Agreements Act, particularly section 334, codified at 19 U.S.C. 3592, as amended by section 405 of Title IV of the Trade and Development Act of 2000, sets forth rules of origin for textile and apparel products. Customs, pursuant to legislative authority, published regulations implementing the principles set forth by Congress.

Section 102.21 of Customs regulations establishes, with specifically delineated exceptions, that "the provisions of this section shall control the determination of the country of origin of imported textile and apparel products for purposes of the Customs laws...." 19 C.F.R. 102.21. Textile and

apparel products that are encompassed within the scope of section 102.21 are any goods classifiable in Chapters 50 through 63 of the HTSUSA, as well as goods classifiable under other specifically enunciated subheadings. See 19 C.F.R. 102.21 (b)(5).

The Velcro® laminated warp knit pile fabric, as previously determined, is classified in Chapter 60, HTSUSA. It is, therefore, a textile product subject to the rules of origin in 19 C.F.R. 102.21. See 19 C.F.R. 102.21 (b)(5).

The country of origin of textile and apparel products is determined by the sequential application of paragraphs (c)(1) through (c)(5) of section 102.21. Paragraph (c)(1) provides that "[t]he country of origin of a textile or apparel product is the single country, territory or insular possession in which the good was wholly obtained or produced." Since the knit fabric was formed in Spain and the polypropylene film was laminated to the fabric in Germany, the origin of the finished laminated warp knit pile fabric cannot be determined by reference to paragraph (c)(1).

Paragraph (c)(2) of section 102.21 provides that where the country of origin cannot be determined according to paragraph (c)(1), resort should next be to paragraph (c)(2). The country of origin, according to paragraph (c)(2), is "the single country, territory or insular possession in which each foreign material incorporated in that good underwent an applicable change in tariff classification, and/or met any other requirement, specified for the good in paragraph (e)" of section 102.21. Paragraph (e)(1), as applicable to the instant determination, establishes a tariff shift rule that provides:

HTSUS Tariff Shift and/or Other Requirement

6001-6006 (1) Except for fabric of wool or of fine animal hair, a change from greige fabric of heading 6001 through 6006 to finished fabric of heading 6001 through 6006 by both dyeing and printing when accompanied by two or more of the following finishing operations: bleaching, shrinking, fulling, napping, decatizing, permanent stiffening, weighting, permanent embossing, or moireing; or, (2) If the country of origin cannot be determined under (1) above, a change to heading 6001 through 6006 from any heading outside that group, provided that the change is the result of a fabric-making process.

Since paragraph (1) of the tariff shift requirement for heading 6001, HTSUSA, does not establish the country of origin of the laminated warp knit pile fabric Customs must examine paragraph (2).

Paragraph (2) of the tariff shift requirement necessitates inquiry into whether the nylon yarn used in the formation of the fabric is classified in a heading other than headings 6001 through 6006, HTSUSA, and whether the tariff shift to heading 6001, HTSUSA, resulted from a "fabric-making process." Although Customs was not advised of the country where the yarn was extruded, since the fabric was formed in Spain and subsequently laminated in Germany, it is not necessary to know the country of extrusion of the yarn.

The yarn of which the Velcro® fabric is knitted is entirely nylon. Nylon yarn is classified in Chapter 54, HTSUSA. Customs Regulations define "fabric-making process" to mean "any manufacturing operation that begins with polymers, fibers, filaments (including strips), yarns, twine, cordage, rope or fabric strips and results in a textile fabric." 19 C.F.R. 102.21 (b)(2). Customs is cognizant that the knit pile fabric in issue is laminated. Subsequent to a thorough examination of 19 C.F.R. 102.21 and prior Customs Service ruling letters, it is the decision of this office that the lamination process, with regards to fabric classified in heading 6001, HTSUSA, does not impact the origin determination.

It is Customs decision that the process of knitting nylon yarn classified in Chapter 54, HTSUSA, into

a textile fabric of heading 6001, HTSUSA, constitutes a manufacturing operation that results in the production of a textile fabric. The country of origin of the Velcro® laminated warp knit pile fabric, knitted in Spain and laminated in Germany is Spain.

HOLDING

The Velcro® laminated warp knit pile fabric is classified in subheading 6001.22.0000, Harmonized Tariff Schedule of the United States Annotated.

The General Column 1 Rate of Duty is seventeen and four-tenths (17.4) percent ad valorem.

The textile quota category is 224.

The country of origin of the laminated warp knit pile fabric, knitted in Spain and laminated in Germany is Spain.

The designated textile and apparel category may be subdivided into parts. If subdivided, any quota and visa requirements applicable to the subject merchandise may be affected. Since part categories are the result of international bilateral agreements which are subject to frequent negotiations and changes, to obtain the most current information available, we suggest your client check, close to the time of shipment, the Status Report On Current Import Quotas (Restraint Levels) an internal issuance of the U.S. Customs Service which is updated weekly and is available for inspection at the local Customs Service office. The Status Report On Current Import Quotas (Restraint Levels) is also available on the Customs Electronic Bulletin Board (CEBB) which can be found on the U.S. Customs Web site at www.customs.gov.

Due to the changeable nature of the statistical annotation (the ninth and tenth digits of the classification) and the restraint (quota/visa) categories, your client should contact its local Customs office prior to importation of this merchandise to determine the current status of any import restraints or requirements.

Sincerely,
Myles B. Harmon, Director

Commercial Rulings Division



ORIGINAL



VIA FEDERAL EXPRESS

December 9, 2003

Mr. Donald S. Clark
Secretary of the Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Textile Labeling

Dear Mr. Clark;

Columbia Sportswear Company is seeking a staff opinion relative to the labeling of composite fabrics (two separate fabrics which are bonded together or laminated and bonded together) under the Textile Fiber Products Identification Act. Examples of different types of fabric we are planning on utilizing in our apparel line are enclosed.

First of all, I would appreciate obtaining clarification as to how the Federal Trade Commission defines a pile fabric. US Customs writes "it is the existence of loops as the fabric comes from the knitting frame, not the presence of an extra yarn, which is a determining factor in classifying pile fabric." They consider that fabric to be pile "if the loop is the direct result of the knitting processing and not the result of further processing (i.e., brushing)." So, if there are any 'raised loops' that are visible when the fabric comes off of the loom, prior to brushing, then the fabric is considered by US Customs to be a pile fabric. Would it be safe to assume that this is the same way the FTC views pile fabrics?

Example #2633 – Windstopper Next to Skin fabric. This material consists of a knit pique laminated to a knit tricot, both being 100% polyester. Since the generic fiber on the pique is the same as the generic fiber on the tricot, we feel we could label products made of this composite fabric as being "All Polyester" or "100% Polyester" pursuant to 16 CFR 303.27.

Example #2635 – Windstopper Classic Fleece fabric. This material consists of a knit jersey mesh (100% polyester) laminated to a knit pile (100% polyester pile and 100% polyester back). 16 CFR 303.24 and your publication Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts indicate that there are two acceptable labeling practices for pile fabrics. One way would be to state the fiber content for the product as a whole; we understand that by that statement, the pile portion of the composite fabric could be labeled as “100% Polyester”. According to 16 CFR 303.27, the other fabric would be considered properly labeled as “100% Polyester”. When we bond the fabrics together, since the generic fiber on the jersey mesh fabric is the same as the generic fiber on the pile, we feel we could label products made of this fabric as being “All Polyester” or “100% Polyester” under 16 CFR 303.27.

A sectional disclosure on the pile would be impossible because (1) the “back” of a pile would not be visible (because of the presence of the other fabric bonded to it) and might be mis-interpreted by the consumer, and (2) on the fabric as a whole, one cannot separate between “face or front” and “back” because either side can be the face, and using such language would potentially confuse the consumer. In a few of our garments, including the enclosed sample, we use both sides of the fabric facing out on different parts of the garment.

Example #2737 – Schoeller WB-400. As there are no rules specifically focusing on composite fabrics, we are interpreting the regulations to support compliance with the rules under the Act if we were to state the percentages by weight of the different fibers of the fabric as a whole. For example, this fabric a woven twill made up of 89% nylon/11% elastane, and the other fabric is 97% polyester/3% elastane knit pile, the percentages by weight of different fibers of the composite fabric would be 48% polyester/41%nylon/11% elastane. We would label garment made of this fabric as 48% polyester/41%nylon/11% elastane.

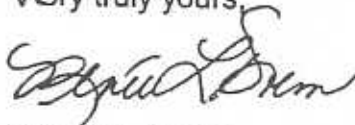
Example Garment – Garment made of Track Terry Fleece #2533. This is a knit terry bonded to a knit “pile” (as per Customs' definitions); both sides being 100% polyester. Sectional disclosure does not properly address the characteristics of this type of composite fabric, as sectional disclosure labeling addresses separate sections of a garment with different fiber compositions, not on the fabric as a whole. This is clarified further by the example given in the Threading Your Way publication: “Body: 100% Cotton; Sleeves: 80% Cotton/20% Polyester.” The language under 16 CFR 303.25 also gives latitude as it explains that one “may” separate the information so as to indicate the fibers of each section; it does not state that one “must” separate the information.

Mr. Donald S. Clark
December 9, 2003
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An argument could be made that the "back" of the component fabric could be considered a lining and thus subject to labeling under 16 CFR 303.22. However, these composite fabrics are not commonly known in the trade as being a usual lining or interlining material, nor are they treated in our garments as such. As evidenced in the enclosed garment, the back side of the fabric as used is not serving a purpose that is regularly supported by a lining. That is, it does not cover the inside stitching, seams, etc. which is typically the function of a lining.

Your clarification of the above points would be greatly appreciated.

Very truly yours,



Renee L. Hoem

/rlh

Enclosures