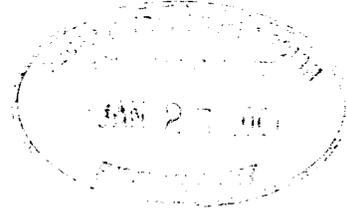


**AMERICAN
FIBER MANUFACTURERS
ASSOCIATION, INC.**

www.fibersource.com

Paul T. O'Day
President

ORIGINAL



January 19, 2001

Memorandum for: Office of the Secretary
Federal Trade Commission

From: Paul T. O'Day, President, *PTO*
American Fiber Manufacturers Association

Subject: 16 CFR Part 303 - Textile Rule 8 Comment – P948404

Thank you for the opportunity to comment on the pending Cargill Dow application for a new generic name and definition for "PLA" fiber.

The American Fiber Manufacturers Association (AFMA) is the trade association for U.S. domestic producers of manufactured synthetic and cellulosic fiber. AFMA's membership accounts for over 90% of the U.S. production and sale of these products.

The Commission's invitation to comment notes that its first criterion in granting new generic names is that the fiber in question "must have a chemical composition radically different from other fibers." AFMA believes that the polylactic, or polylactide, configuration of the proposed new generic fiber meets this test. Accordingly, our recommendations are limited to the following two aspects of the matter under consideration:

1. The Definition of the New Generic Fiber

AFMA believes that the appropriate approach under the Commission's stated criteria would be to limit the new definition only to a description of its chemical composition rather than the method of manufacture.

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BASF Corporation - *Fiber Products Division*

Drake Extrusion
DuPont Company
Honeywell
Intercontinental Polymers, Inc.

KoSa
Martin Color-Fi
Nan Ya Plastics Corp., America
Pliana, Inc.

Sterling Fibers, Inc.
Solutia Inc.
Universal Fiber Systems, L.L.C.
Wellman, Inc. (*The Fibers Division*)

The chemical structures covered by the application may be reached via a variety of routes - - others will follow as the result of new research and innovation. Limiting the new fiber's definition to selected inputs, or to particular production routes, would unduly limit the new designation's reach - - to the point where the very term "generic" might not apply. Although AFMA supports the establishment of a new generic term for this product, we recommend adoption of a definition that only specifies the chemical structure covered.

2. Potential Consumer Confusion with Similar Commercial Names

AFMA would like to bring to the attention of the Commission two other commercial names now in use that could result in confusion should the new PLA fiber be designated as "synterra." Sontara® and Sensura® are trade names used by DuPont and Wellman Fibers, respectively. They apply to fibers, fabrics and end product uses that substantially overlap the anticipated uses for PLA fiber. In view of the potential for consumer confusion among these terms we recommend that the Commission designate a generic term for the new fiber that would avoid any misunderstanding.

We would be pleased to provide any additional information that would be useful to the Commission on this matter.