

SCHAGRIN ASSOCIATES

900 SEVENTH STREET, N.W. - SUITE 500 - WASHINGTON, D.C. 20001
P: (202) 223-1700 NPHILLIPS@SCHAGRINASSOCIATES.COM F: (202) 429-2522

June 29, 2026

PUBLIC VERSION

Pursuant to FTC Rule of Practice 4.9(c), business proprietary information of Everbloom removed from brackets on pages 1-18.

BY ELECTRONIC FILING

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

CC: Brian Berggren, Acting Assistant Director, Division of Enforcement, Bureau of Consumer Protection

Re: Everbloom's Application for Generic Fiber Name "Renoa"

Dear Secretary Ferguson,

On behalf of Everbloom Bio Inc. ("Everbloom"), we hereby submit, pursuant to 16 CFR §303.8, this application requesting the designation of a generic fiber name and definition for a United States-manufactured fiber that Everbloom has developed for use in garments for commercial sale. Everbloom produces this fiber through a proprietary technology that incorporates protein-based textile [] into carrier polymers. The resulting fiber combines the performance and durability of synthetic fibers with the aesthetics and dyeability of noble fibers such as wool and silk. As explained further below, the chemical composition of Everbloom's fiber is radically different from any of the generic fiber names that are currently included in the list provided at 16 CFR §303.7. Accordingly, this fiber requires its own designation. Everbloom hereby proposes that the Federal Trade Commission ("FTC") apply the designation "renoa" to Everbloom fiber.¹

¹ The remainder of this petition will use the designation "renoa" to refer to Everbloom fiber.

PUBLIC VERSION

I. GENERAL DESCRIPTION OF RENOA

Renoa is composed of a [

]. Everbloom uses proprietary melt spinning technology to incorporate waste protein and additives into renewable, sustainable, biodegradable carrier polymers to produce a proprietary textile fiber that combines the performance and durability of a synthetic with the aesthetics and dyeability of wools and silk. [

]. [

]. Because

this fiber is not described by any existing generic names established by the FTC, we propose to apply the generic name “renoa” to the fiber.

II. RENOA CANNOT BE IDENTIFIED BY AN EXISTING GENERIC NAME (16 §303.7(1))

Renoa cannot be identified by any existing generic fiber name. This is because [

].

Accordingly, the grant of a generic name is of importance to Everbloom’s customers, including textile manufacturers and the consuming public, and not merely to smaller groups of

PUBLIC VERSION

industry professionals such as purchasing officers. Because of the unique properties of renoa, it would be inaccurate to refer to it using an existing generic fiber name. Doing so would create confusion and potentially result in unfair business practices with respect to other textile fiber manufacturers and consumers.

At 16 C.F.R. §303.7, the FTC lists existing generic fiber names. Below, Everbloom provides the reason why its fiber cannot be categorized by any of these existing names:

A. Acrylic

Acrylic must contain at least 85% by weight of acrylonitrile units. Renoa is composed of a biopolymer and protein mix.

B. Modacrylic

Modacrylic contains between 35% and 85% acrylonitrile units. Renoa does not have acrylonitrile units in these defined percentages.

C. Polyester

Polyester is defined by having at least 85% by weight of an ester of a substituted aromatic carboxylic acid. Renoa does not have at least 85% by weight of an ester of a substituted aromatic carboxylic acid.

D. Rayon

Rayon is composed of regenerated cellulose. Renoa is not a cellulose based fiber.

E. Acetate

Acetate consists of cellulose acetate. Renoa does not utilize cellulose acetate in its composition.

F. Saran

PUBLIC VERSION

Saran requires at least 80% vinylidene chloride units. Renoa is chemically distinct from vinylidene chloride.

G. Azlon

Azlon is composed of regenerated naturally occurring proteins. []

H. Nytril

Nytril must contain at least 85% vinylidene dinitrile. Renoa does not have at least 85% vinylidene dinitrile.

I. Nylon

Nylon is composed of a long-chain synthetic polyamide. Renoa is a biopolymer and protein composite.

J. Rubber

Rubber is composed of natural or synthetic rubber. The fiber forming substance of Renoa is not hydrocarbon, polychloroprene, or chloroprene copolymer.

K. Spandex

Spandex consists of at least 85% segmented polyurethane. Renoa does not consist of at least 85% segmented polyurethane.

L. Vinal

Vinal contains at least 50% vinyl alcohol units. Renoa does not feature vinyl alcohol as its primary chain.

M. Olefin

Olefin contains at least 85% ethylene, propylene, or other olefin units. Renoa does not contain the units listed under the Olefin definition.

N. Vinyon

Vinyon requires at least 85% vinyl chloride units. Renoa does not contain vinyl chloride units with a composition of greater than or equal to 85%.

O. Metallic

Metallic fibers are composed of metal or metal-coated materials. Renoa is not a primarily metal-based material.

P. Glass

Glass fibers are made of glass. Renoa is not a primarily glass based material.

Q. Anidex

Anidex is composed of at least 50% esters of monohydric alcohol and acrylic acid. Renoa does not have at least 50% esters of monohydric alcohol and acrylic acid.

R. Novoloid

Novoloid contains at least 85% cross-linked novolac. Renoa does not contain cross-linked novolac.

S. Aramid

Aramid is a long-chain synthetic polyamide with aromatic rings. Renoa does not fit this definition since it is not a long-chain synthetic polyamide with aromatic rings.

T. Sulfar

Sulfar is a synthetic polysulfide with aromatic sulfide linkages. Renoa does not contain aromatic sulfur-based linkages.

U. PBI

PBI features recurring imidazole groups. The composition of renoa does not include recurring imidazole groups.

PUBLIC VERSION

V. Elstaoester

Elastoester is at least 50% aliphatic polyether and 35% polyester. RENOA does not have aliphatic polyether and polyester in these defined percentages.

W. Melamine

Melamine fiber is at least 50% cross-linked melamine polymer. RENOA does not fit the criteria of at least 50% cross-linked melamine polymers.

X. Fluoropolymer

Fluoropolymers are synthesized from aliphatic fluorocarbon monomers. RENOA does not use fluorocarbon monomers.

Y. PLA

PLA consists of at least 85% lactic acid ester units derived from sugars. RENOA has less than 85% sugar derived ester units.

III. CHEMICAL COMPOSITION OF RENOA (16 C.F.R. §303.8(2))

RENOA is composed of a [

]. [

]. The chemical and mechanical properties of renoa are listed in

the below chart:

Property	Value (renoa)	Value (fine wool)
Tenacity (gpd)	[]	[]
Elongation at Break (%)	[]	[]
Denier (dpf/μm)	[]	[]
Hot Air Shrinkage (%)	[]	[]
Tensile Strength	[] []	[] []

PUBLIC VERSION

Decomposition Temperature(°C)	[]	[]
----------------------------------	-----	-----

Renoa contains [

]. [

]:

[

[

]

[

PUBLIC VERSION

]

[

]

[

]

[

]:

[

]

[

]

PUBLIC VERSION

[

]:

[

]

[

]

[

]

[

]

[

]

PUBLIC VERSION

[

]. [

]. [

]. [

]. [

]. [

]

[

]

PUBLIC VERSION

[[]]

[[]]

[[]]

[[]]

[[]]

12

]

I

IV. SUGGESTED NAME AND PROPOSED DEFINITION (16 C.F.R. §303.8(3))

The suggested name for Everbloom's fiber is "renoa." The proposed definition is:

- A manufactured fiber in which the fiber-forming substrate is composed of [] of regenerated keratin proteins and the remaining composed of aliphatic bio-based polyesters.

V. OTHER PERTINENT INFORMATION (16 C.F.R. §303.8(4))**A. Manufacturing Process**

Everbloom has developed novel [] and processing methods that enable the production of renoa using conventional melt-spinning equipment. []

[]. The feed material includes various sources of [] protein. The proteins are [] processed into uniform pellets. Everbloom's technology allows for the processing of material using existing melt spinning infrastructure to spin the pellets into fiber. The resulting yarn is knitted and weaved into apparel and home goods products []

]

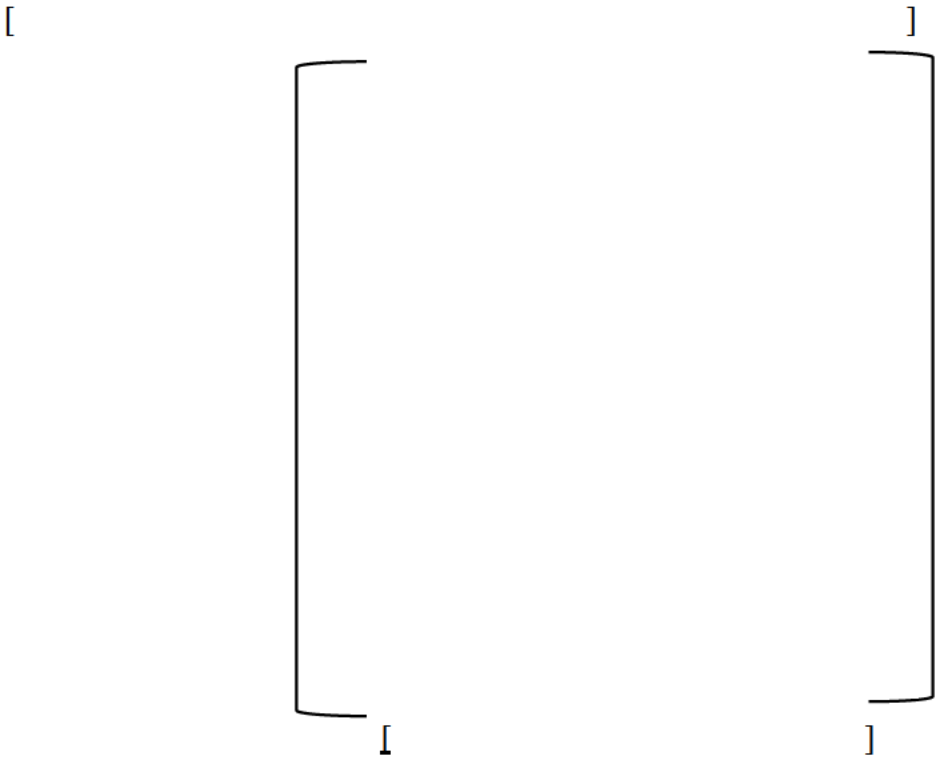
[

]

PUBLIC VERSION

[REDACTED]

[REDACTED]



The bobbins are displayed in Figure []:



Figure]16]: Bobbins of Yarn Produced

[

]

PUBLIC VERSION

[REDACTED]

[REDACTED]

[

]

[

]

[REDACTED]

[REDACTED]

[

]

PUBLIC VERSION

The yarn is cut and crimped into staple fibers as seen in Figure []:



Figure []: RENOA Staple Fiber After Cutting and Crimping

VI. THE EARLIEST DATE RENOA WILL BE MARKETED IN COMMERCE (16 C.F.R. §303.8(5))

The earliest date on which Everbloom proposes to market or handle renoa in commerce for other than developmental or testing purposes is [].

* * *

PUBLIC VERSION

Should the FTC have any questions regarding this submission, please contact the undersigned.

Respectfully submitted,

/s/ Nicholas C. Phillips
Amanda Swenson
Nicholas C. Phillips*
SCHAGRIN ASSOCIATES
900 Seventh St. N.W., Suite 500
Washington, D.C. 20001
(202) 223-1700 (telephone)
(202) 429-2522 (fax)
nphillips@schagrinasociates.com

Counsel for Everbloom

*Admitted only in New York.
Practice limited to matters before
federal courts and agencies.