

**National Corn
Growers Association**

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ORIGINAL

January 25, 2001

Office of the Secretary
Federal Trade Commission
Room 159
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

484357-#4

Re: 16 CFR Part 303 – Textile Rule 8 Comment – P948404

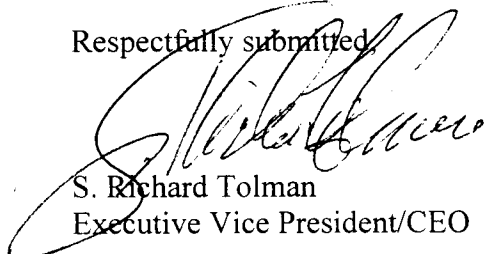
Dear Sir:

As the trade organization representing corn growers throughout the United States, the National Corn Growers Association (NCGA) supports creating a new fiber definition for polylactic acid (“PLA”) fiber using the generic name “synterra”. The NCGA has supported the development of PLA through several applications research grants at various universities. We believe that the manufacture of a biobased fiber which competes with high performance synthetic materials is truly revolutionary.

We understand that petitions must meet the three criteria outlined by the FTC in the notice and believe that PLA meets the criteria for a new generic fiber designation. PLA offers distinct performance characteristics and properties of significance to the public. PLA is clearly distinct because it is derived from a renewable resource and its chemical structure is significantly different from other fibers. The use of corn as a feedsource coupled with a fermentation process produces a unique material. Conversely, Polyester is understood by the public to be a purely synthetic material derived from petrochemical feedstock. Revising the current definition for polyester to include PLA fibers, or to create a separate category and definition for a naturally derived fiber like PLA within the polyester category, will create consumer confusion. Only the third option proposed by the FTC, creating a new separate category in Rule 7 for PLA fiber, satisfies all the FTC’s criteria for granting applications for new generic fiber names. Granting a new name such as synterra is important to the general public because consumers will want to distinguish between fibers made from renewable resources and those made from petro-chemicals.

Thank you for allowing the National Corn Growers Association to participate in your rulemaking proceeding.

Respectfully submitted,


S. Richard Tolman
Executive Vice President/CEO

cc: James G. Mills