



May 10, 2013

Ambassador Demetrious Marantis
Acting, United States Trade Representative
600 17th Street, NW
Washington, DC 20508

Re: Request for Comments Concerning the Proposed Transatlantic Trade and Investment Partnership (TTIP)

Dear Ambassador Marantis:

On behalf of the Outdoor Industry Association (OIA), we are thankful for the opportunity to provide comments regarding the proposed Transatlantic Trade and Investment Partnership (TTIP) between the United States and the European Union (EU).

The outdoor industry supports more than 6.1 million jobs in the United States and annually contributes more than \$646 billion to the U.S. economy through retail sales and services. OIA members are the leading global innovators of performance textiles, apparel, footwear and outdoor equipment. Our industry's continued success is reliant on cutting edge product innovations, and fast and efficient product movement through complex global value chains. To ensure our competitiveness, sourcing strategies and business models are dependent on TTIP being designed to reflect these market realities through simple and flexible rules of origin for most outdoor products, liberalized market access and regulatory harmonization.

OIA promotes a balanced trade agenda, representative of its diverse membership of importers and domestic manufacturers and retailers of all sizes. We support the Obama administration's commitment to expand and strengthen our economic relationship with the European Union through the TTIP. Many of OIA's member companies are already deeply integrated within this region and are excited about the vast benefits this trade agreement could provide.

Achieving regulatory harmonization would greatly benefit outdoor companies, especially if the current administrative burdens are minimized. Presently, outdoor products' time to market are greatly skewed between the two regions because of varying regulatory testing procedures and processes. Furthermore, differing interpretation of EU regulations at the member country level has resulted in prohibition of US products sales in some countries while others approve. All of this proves to be costly and negatively affects product cycle planning. Designing synonymous testing standards that are accepted by both the United States and the all European Union member countries under the TTIP would be ideal for OIA's diverse membership.



Additionally, many of OIA's members rely on U.S. government procurement restrictions administered under the Berry Amendment and the Buy American Act. We are concerned by the European Union's publically stated goal of gaining unilateral preferential access to U.S. government procurement. Both the Berry Amendment and the Buy American Act should be preserved. Achieving their purpose of sourcing of textiles and apparel domestically would be completely eradicated if procurement preference was given to the EU. Moreover, changes to these restrictions would jeopardize the viability of many U.S. companies and their workers. We strongly recommend that government procurement restrictions are not amended under the TTIP.

We thank you for this opportunity to provide comments on the TTIP agreement and for their consideration during negotiations.

Sincerely,

A handwritten signature in black ink that reads "Frank Hugelmeyer". The signature is fluid and cursive, with a long horizontal line extending from the end.

Frank Hugelmeyer
President and Chief Executive Officer