



May 20, 2011

Mr. Andrew McGilvray
Executive Secretary
Foreign Trade Zones Board
Herbert Clark Hoover Building
14th Street and Constitutions Avenue, NW
Washington, DC 20230

Re: Foreign Trade Zones Board Proposed Rule 75
Federal Register 82340-82362, December 30, 2010
Docket# ITA-2010-0012, RIN 0624-AA81

Dear Mr. McGilvray,

As a zone operator within zone 086 in Tacoma, WA, Norvanco International, Inc. would like to submit our comments relating to the docket noted above.

Norvanco fully supports and agrees with the comments, changes, and sentiments of the NAFTAZ response dated May 4, 2011.

In addition, we would like to offer our comments on the following sections of the proposed regulations:

- Alternate Site Framework (ASF) needs to be included, in detail, into the new regulations.
- 400.51 Accounts, records, and report: Norvanco feels strongly that data provided by FTZ Participants should be confidential and treated as such. High level data can be used for the board's annual report, but under no circumstance should proprietary trade details be made public. The use of a None Disclosure Agreement (NDA) is standard Norvanco policy when sharing internal business information and practices. Should the information provided to the board be made public, it would minimize the security of this information, potentially causing financial harm to the company and our clients.

We appreciate the opportunity to provide our feedback on this important issue and thank you in advance for your review and consideration of our comments.

Respectfully,

Chris Fladager

Vice President – Director of Imports

Ph: 253-987-4046

Fx: 253-987-4746

cfladager@norvanco.com