

May 26, 2011

Submitted via www.regulations.gov

Mr. Andrew McGilvray
Executive Secretary
Foreign-Trade Zones Board
U.S. Department of Commerce
1401 Constitution Avenue NW, Room 2111
Washington D.C. 20230

Re: Comments to Proposed Changes to Foreign-Trade Zone Regulations
Docket No. ITA-2010-0012, RIN 0625-AA81

Dear Mr. McGilvray:

These comments are provided on behalf of the Columbus Regional Airport Authority (CRAA), Grantee of Foreign-Trade Zone #138. FTZ #138 serves 25 counties in central Ohio and is a member of the National Association of Foreign-Trade Zones (NAFTZ).

CRAA fully supports the comments submitted by the NAFTZ. In addition, there are three areas to which we would like to provide further comment based on our perspective as a Grantee.

The first area relates to the Alternative Site Framework (ASF). CRAA has been approved and is operating under the ASF. Therefore, we feel that language to formally include the ASF program as a part of the FTZ Regulations is needed. The ASF program is a useful option for Grantees which will help the future growth of the FTZ program. The guidelines posted on the FTZ Board website should be incorporated into the new FTZ Regulations.

Uniform treatment has always been a top concern for CRAA, and we are supportive of the proposed changes to this section (400.45). However, posting online the entire zone schedule, which includes our standard agreements, should be reconsidered. We do not see the benefit to such a requirement and consider each agreement to be a business matter between the CRAA and the counterparty to the agreement and should not be available to the general public unless required to be disclosed pursuant to a valid public records or freedom of information request. The agreements should only be made available to prospective users upon request.

Our last comment has to do with the proposed changes to the Grantee Liability section (400.47) and the associated fines and penalties section (400.62). CRAA is very supportive of the proposed changes to these sections. However, there should be additional language included in this section to clarify that the Operator is to be the sole

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recipient of a penalty in those cases where the Grantee timely notifies the FTZ Board that the reason its Annual Report is not completed is due to the failure of a specific Operator to provide its portion of the Annual report to the Grantee. Grantees should not be held liable for the actions (or non-actions) of an Operator.

CRAA appreciates the FTZ Board taking on the enormous task of revising the Regulations. Thank you for considering our comments.

Sincerely,



Angela Atwood
FTZ Administrator