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May 25, 2011

Via eRulemaking: [www.regulations.gov](http://www.regulations.gov)

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

Re: Comments on Foreign-Trade Zones in the United States  
Docket: 090210156-0416-01  
RIN: 0625-AA81

Dear Mr. McGilvray:

On behalf of the Virginia Port Authority (VPA), Grantee for Foreign-Trade Zone #20, the following comments are respectfully submitted on the Foreign Trade Zone Board's (FTZB) recently proposed rule published in the Federal Register issued on December 30, 2010 at 75 Fed Reg 82340, concerning proposed changes to the FTZ regulations.

**NAFTZ SUBMISSION OF PROPOSED REVISIONS**

The primary comment offered in this letter is the support of those changes and revisions offered up by the National Association of Foreign-Trade Zones (NAFTZ) and submitted May 4, 2011. There was an exceptional amount of committee and task force efforts within the NAFTZ, and input drawn from every category within the membership. The consensus among members of the NAFTZ, which rightly are those most directly affected by these proposed changes, is more than enough to compel this support for those comments.

The Virginia Port Authority is one of the leading seaports in the United States and has held its Grant of Authority for Foreign-Trade Zone #20 since 1975. There is a strong recognition among all levels of port management of the strength of the zones program within international trade. It allows a number of our

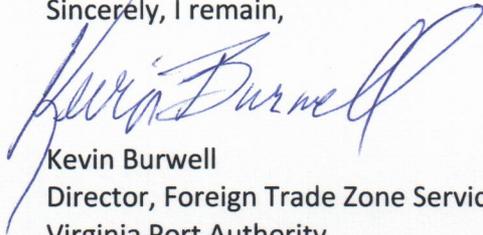
port customers to operate competitively and maintain an established presence in the Hampton Roads region, while also protecting the retention of jobs locally and in the United States generally.

As the Grantee, the VPA is also interested in the expeditious and efficient addition of qualified entrants to our zone when needed. The VPA believes that the proposed changes offered by the NAFTAZ support that substantially. This Grantee is also quite interested in the proper management and oversight of this zone, without additional burden, risk, or financial concern to the Grantee. There is agreement in general that there should be Uniform Treatment and that zone management should operate under public utility principles. Again, those comments offered by the NAFTAZ are supportive of this view.

The VPA respectfully requests that all due consideration be given those comments offered by the NAFTAZ, an organization that provides a strong voice for its members.

My sincere appreciation for this opportunity to comment on the changes proposed by the FTZB and to offer support for the revisions submitted by the NAFTAZ. I know that at the end of this process, we will all have a much stronger, more dynamic and flexible zones program.

Sincerely, I remain,

A handwritten signature in blue ink, appearing to read "Kevin Burwell", with a large, stylized flourish extending from the end of the name.

Kevin Burwell  
Director, Foreign Trade Zone Services  
Virginia Port Authority  
600 World Trade Center  
Norfolk, VA 23510