



May 25, 2011

Mr. Andrew McGilvray  
Foreign-Trade Zones Board  
1401 Constitution Avenue, NW  
Room 2111  
Washington, D.C. 20230

Re: Foreign-Trade Zones Board Proposed Rule  
75 *Federal Register* 82340-82362, December 30, 2010  
Docket # ITA-2010-0012, RIN 0625-AA81

Dear Mr. McGilvray:

I am filing this letter regarding the Proposed Rule published in the *Federal Register* on December 30, 2010 by the Foreign-Trade Zones Board. Greater Kansas City Foreign Trade Zone, Inc. ("GKCFTZ") fully supports this update to the Foreign-Trade Zones Board Regulations.

One area that should be updated is the current requirements for the Zone Schedule. A Zone Schedule requires that a Foreign-Trade Zone Operator's fee schedule is included with the Zone Schedule. In many cases, the Zone Operator is, today, a third-party logistics provider that has a specific fee arrangement with its users. This should not need to be published in the Zone Schedule. It is not necessary. This requirement appears to be held over from the past when the Foreign-Trade Zones program was implemented in 1934. At that time there were Grantees that were also Operators with a fee schedule for their Foreign-Trade Zone Operations. Under those circumstances, it was more appropriate for an Operator to include its fee schedule in the Zone Schedule. If there are any Grantees that currently still operate a Foreign-Trade Zone warehouse then a fee schedule would be appropriate. Otherwise, it is GKCFTZ's belief that a fee schedule for the Grantee is all that should be included in the Zone Schedule to conform with current practices.

Additionally, one of my zones, Zone No. 17 is currently operates under the Alternative Site Framework. I do agree with the National Association of Foreign-Trade Zones' (NAFTZ) suggestion that the Alternative Site Framework should be more clearly defined in the Federal Regulations. I realize this is a new option that is still being modified. However, I think it would provide companies more certainty to see the basic requirements of the Alternative Site Framework included in the Foreign-Trade Zones Board Regulations.

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Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'A' followed by a horizontal line that tapers to the right.

Alfred J. Figuly  
President and CEO

cc: GKCFTZ Executive Committee