



Commissioners
Bill McGregor
Jeff Davis
George Barner

Submitted via email to: 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:

The Port of Olympia is Grantee of the South Puget Sound Foreign-Trade Zone (FTZ No. 216) which has been an integral part of Thurston, Mason, Kitsap & Lewis County economic development program and has been used on a continuous basis for the past 15 years. The Port of Olympia is a member of the National Association of Foreign-Trade Zones (NAFTZ) and has reviewed the comments submitted by the NAFTZ. The Port of Olympia fully supports and endorses the comments filed by the NAFTZ.

We support the NAFTZ suggestion that the time frame for approval by the FTZB of all applications be reduced by 50%. Such a timeframe will enable Grantees to get potential users into the zone program in a much more expeditious manner. The Port of Olympia unequivocally supports the concept of equal treatment for all zone participants and the need for Grantees to function under public utility principles. However, we believe that the Regulations as proposed by the NAFTZ are much more practical and viable than those contained in the Regulations as proposed by the FTZB.

With regard to the proposed Section 400.47 dealing with Grantee liability, we believe the Grantee should have absolutely no liability if a violation occurs as a result of the actions or inactions of a specific Operator/User without the Grantee's participation. With regard to proposed Subpart G dealing with fines, penalties and mitigation of the fines and penalties, we fully support the proposals put forth by the NAFTZ and believe that the sections as proposed by the FTZB would have a chilling effect on the use of the FTZ program by both Grantees and potential Operators and Users.

The Port of Olympia fully supports the FTZB endeavor of modifying the FTZB Regulations that have been in existence for almost 20 years. We trust that you will give serious consideration and adopt many of the suggestions contained in the comments filed by the NAFTZ. Thank you for your ongoing efforts to make the FTZ program a more flexible and useful program for economic development in the United States.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennie Foglia-Jones".

Jennie Foglia-Jones
FTZ Administrator, FTZ #216