SUPPLY CHAIN MANAGEMENT GROUP, INC.

May 25, 2011

SCMG-2011-112

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

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

Dear Mr. McGilvray:

The Foreign-Trade Zones Board (FTZ Board) published the Proposed Rule (copy attached) in the Federal Register on December 30, 2010. Please accept this letter as comments from Supply Chain Management Group, Inc., a U.S. based company strongly committed to U.S. global competitiveness.

We express our strong support for the suggested changes submitted by the National Association of Foreign-Trade Zones (NAFTZ) on May 4, 2011 and a follow-up letter on May 19, 2011. We strongly agree that the FTZ Regulations must expedite and streamline the Application process for, and operations of Foreign-Trade Zones. This position is imperative at this time in our Country's history, our economic development, our trade relationships with the rest of the world and in light of the President's NEI Initiative which is designed to double U.S. exports in the next five years.

However, the changes proposed by the FTZ Board fall far short of the goal of streamlining and expediing the FTZ Application process and operational processes. Conversely, the changes to the proposed regulations promulgated by the NAFTZ **DO** reflect real-world, positive changes that will streamline the FTZ Application and operational processes while ensuring close and effective oversight and collaboration by the appropriate Federal agencies involved in FTZ Applications and oversight. The changes proposed by the NAFTZ will enhance the global competitiveness of all U.S. Companies, particularly small and medium sized business struggling to export and compete around the world.

Specifically, the changes proposed and submitted by the NAFTZ reflect "real world" solutions and improvements which will facilitate FTZ Applications and operations in the areas of: 1)Facilitation of Production and Manufacturing; 2)Expediting FTZ Board approval; 3)Reduction in Public Comment Period; 4)Fair and equitable Penalties; 5)Equal Treatment/Public Utility principles; 6)Incorporating the Alternative Site Framework (ASF) model; 7)Expediting the FTZ Application process; and 8)other positive, practical improvements to the current and proposed Regulations.

Again, Supply Chain Management Group, Inc. strongly supports the comments and proposed changes to the Regulations sub by the NAFTZ and encourages the FTZ Board and Staff to carefully consider and incorporate those positive changes into the FTZ Regulations.

Sincerely,

Jeffrey L. Neubert

Jeffrey L. Neubert, P.E.
President

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