

May 25, 2011

Submitted through Federal eRulemaking portal at www.Regulations.gov

Mr. Andrew McGilvray
Executive Secretary/Staff Director
Foreign Trade Zones Board
U.S. Department of commerce
1401 Constitution Ave., NW, Room 2111
Washington, DC 20230

Re: NPRM Docket No. ITA-2010-0012

Dear Mr. McGilvray:

Thank you for the opportunity to comment on the U.S. Foreign Trade Zones Board Notice of Proposed Rulemaking published December 30, 2010. We applaud the effort made by you and your staff to review the regulations as they exist and propose extensive changes designed to move the program forward in its function to promote U.S. investment, manufacturing, employment, and exports.

Zone Solutions has assisted in the activation, implementation and on-going daily administrative operations for multiple FTZ projects throughout the nation, several of which have led to a large level of exports. We have a continued focus on raising awareness of the FTZ program and assisting U.S. based companies and communities in job retention and job growth activities.

Zone Solutions fully supports the comments, and supplemental comments filed by the National Association of Foreign Trade Zones (NAFTZ), and offer the following additional comments:

Section 400.14 – Production--activity requiring approval or reporting; restrictions.

We believe that the requirement of admitting goods subject to AD/CVD in privileged foreign status, thereby preserving the HTS designation of the original form of the merchandise, is adequate for on-going activity. A requirement to obtain prior approval for such merchandise would be exceedingly burdensome, while adding no additional value or realizing any further safeguard.

Section 400.37 – Procedure for notification and review of production changes.

We support the NAFTZ's recommendation to delete this section. Proposed quarterly reporting and associated public notice and comment is overly burdensome for both government and industry.

Section 400.46 – Complaints related to public utility and uniform treatment.

We strongly recommend the NAFTAZs suggested changes to this section.

Section 400.63 – Voluntary disclosure.

It is important and warranted that similar notification and mediation procedures are in place for FTZ users as those which are available to traditional importers. We strongly agree with the NAFTAZ's comments on this section.

We are pleased to provide these comments for the Board's review and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Eva Tomlinson".

Eva Tomlinson
President & CEO