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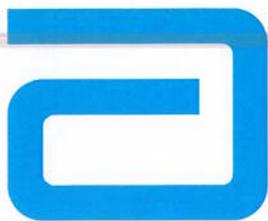
Mr. Andrew McGilvray
Foreign-Trade Zones Board
1401 Constitution Avenue, NW
Room 2111
Washington, D.C. 20230

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

Dear Mr. McGilvray:

We are Abbott Laboratories, Subzone Operator of Foreign-Trade Subzone No. 22F in North Chicago, Illinois. We have successfully used the Foreign-Trade Zones program to enhance our international business for several years. You may recall that we recently expanded the Subzone to include two new sites. We embrace the update of the Foreign-Trade Zones Board Regulations. Many of the proposed changes reflect the current circumstances in the global economy. However, we do have concern regarding proposed changes to the Scope of Authority.

Any company that produces or manufactures products in foreign-trade zones would be significantly impacted by the new FTZ Board Proposed Rule. As written, the proposed Regulations require advance approval from the FTZ Board for any sourcing change, any historical or current imposition of anti-dumping and countervailing duty assessment, any change in duty rates, and any change in capacity. The proposed Regulations require a one-time refiling of the entire scope of FTZ productions/manufacturing authority and quarterly reporting thereafter. This change would increase reporting requirements for the entire FTZ community and failure to obtain the advance approval from the FTZ Board could result in the imposition of fines and penalties on the Operator, User, and potentially the Grantee. Under instances such as a change in anti-dumping, countervailing duty status of goods previously authorized, a change in duty-rate, a change in capacity, a change in



production, we believe that the current Regulations adequately provide for authorization/approval by the Foreign-Trade Zones Board and provide on-going oversight through existing regulatory language. In some instances as written, we believe that the proposed Regulations would result in a public notice which would provide for the duplicative vetting of previously approved authorizations.

We agree with the new approach suggested by the National Association of Foreign-Trade Zones. If a pharmaceutical company's grant of authority specifically provides for the production of pharmaceutical drugs and medical devices, then the on-going authorization or review of Scope of Authority could be eliminated so long as the Company remains within that Scope.

Additionally, we do not agree that a quarterly notification option is viable. It will require extensive resources be devoted to reporting. We do believe that the regulatory oversight of the Board should continue in a streamlined form. We agree with the National Association of Foreign-Trade Zones approach to this process by changing the application process so that the applications are focused on the production or manufacturing of the intermediate/finished products without specific reference to all the materials/parts utilized. This proposed procedure would eliminate all the FTZ Board's original proposed requirements concerning changes in AD/CVD, sourcing, capacity, and duty-rates.

Best Regards,

Scott Wienke
Manager, GPO Customs & Trade Compliance