

Barnes Consulting, LLC

122 Lakeland Avenue
Moore, SC 29369-9799
864-595-1382

www.BarnesConsultingLLC.com

June 24, 2011

Mr. Andrew McGilvray
Executive Secretary
FTZ Board, International Trade Administration
US Department of Commerce
1401 Constitution Avenue, NW, Room 2111
Washington, DC 20230

Dear Mr McGilvray:

Subject: Proposed Rule, Foreign-Trade Zones
Anti-Dumping/Countervailing Duties (AD/CVD)

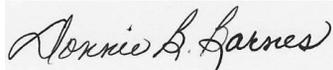
I am writing to counter the comments made by Rep. Bill Johnson who is uninformed as to how FTZs deal with AD/CVD in day-to-day operations. He evidently doesn't know that material subject to AD/CVD must be placed in Privileged Foreign (PF) zone status so the AD/CVD cannot be avoided on imports imported through an FTZ.

Please be advised that companies forced to use items subject to AD/CVD in most cases would rather use items made in the US that do not have these penalty duties applied. That, however, is not always possible because US companies 1) do not want to tool up for small quantities required or 2) are not willing to or cannot meet the requirements for the materials. Companies using these products also create jobs in the US, and Rep. Johnson should check with companies such as Honda that manufacture in Ohio to see how many jobs are created by those companies.

Being able to avoid paying the AD/CVD on goods that are re-exported from the US also encourages manufacturing in the US that would have otherwise taken place overseas. And the value of those exports includes US labor, overhead, profit and domestic materials, thereby improving our balance of trade with other countries.

The current treatment of AD/CVD items in an FTZ serves the commerce of the US well and should not be changed.

Respectfully,



Donnie Bailey Barnes, LCB, AZS
Vice President, CEO