

Madawaska Foreign Trade Zone Corporation

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May 25, 2011

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

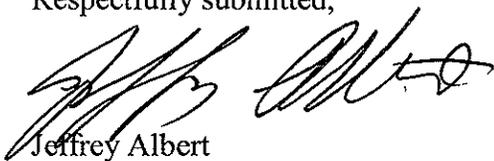
Re: Foreign-Trade Zones Board Proposed Rule
75 Federal Register 82340-82362, December 30, 2010
Docket #ITA-2010-0012, RIN 0625-AA81

Dear Mr. McGilvray:

I am filing this letter regarding the Proposed Rule published in the Federal Register on December 30, 2010 by the Foreign-Trade Zones Board. I fully support an update to the Foreign-Trade Zones Board Regulations. We are concerned that the notification provisions, which include submitting a new scope of authority and quarterly reporting, are overly burdensome on small Operators. We agree with the Nation Association of Foreign-Trade Zones' (NAFTZ) proposed changes or an alternative that is less burdensome.

Another area that should be updated is the current requirements for the Zone Schedule. A Zone Schedule requires that a Foreign-Trade Zone Operator's fee schedule is included with the Zone Schedule. In many cases, the Zone Operator is, today, a third party logistics provider that has a specific fee arrangement with its users. This should not be published in the Zone Schedule. It is not necessary. This is a much different time than when the Foreign-Trade Zones program was implemented in 1934. At that time there were Grantees that were also Operators with a fee schedule for their Foreign-Trade Zone Operations. It was more appropriate then for an Operator to include its fee schedule. If there are any Grantees that currently still operate a Foreign-Trade Zone warehouse then a fee schedule would be appropriate. Otherwise, it is my belief that a fee schedule for the Grantee is all that should be included in the fee schedule of the Zone Schedule to conform with modern practices.

Respectfully submitted,



Jeffrey Albert
Chairman
Madawaska Foreign-Trade Zone Corp.
Grantee, Foreign-Trade Zone #179