

# PUBLIC SUBMISSION

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**Docket:** ITA-2010-0012

Foreign-Trade Zones in the United States Proposed Rule; Request for Comments.

**Comment On:** ITA-2010-0012-0004

Proposed Revisions to the FTZ Regulations

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## General Comment

We operate in a highly competitive, volatile marketplace driven by rapid technological change and consumer demand. The FTZ offers us benefits that allow us to react quickly to change while staying price competitive. The proposed new regulations will seriously undermine such benefits.

Having to report on every sourcing, capacity or HTS change as proposed will place an expensive and cumbersome administrative burden on our operation that will inhibit our ability to react effectively to market change, and may drive us out of the FTZ program all together.

While we may not support all specific steps outlined by the NAFTAZ and their counsel in response to these proposed regulations, we support their efforts to bring a more realistic, rational, business-friendly approach to the discussion about updating the existing FTZ regulations.