

# 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

While I support the efforts of the Foreign-Trade Zone's board to update its regulations in a manner to further production activity, especially export related activity within the United States, I would like to bring your attention to what is a significant burden on companies with respect to their scope of authority.

The current process has evolved to companies needing to provide HTS classification data for all proposed inputs. It is difficult for businesses to determine all the possible HTS codes that they may eventually use as their businesses grow and mature. The ability to provide a quarterly update of changes is a welcome improvement over being required to request a scope update in advance. This still requires companies to provide additional reporting and maintaining information on file with the Board. As an alternative, as proposed by the NAFTAZ, to focus scope and approval on the output of the production facility would seem to be a more logical and streamlined approach. When a company changes what parts it is going to produce and provide to the domestic market it would provide notice to the Board, but the process of changing one of the inputs, provided those inputs are not subject to any controversial issues, would not require either permission or notification and would not be considered as part of the scope approval.

I believe this approach can reduce overall paperwork, and help companies and the Board focus their efforts and resources on the more significant or controversial items.