

National Association of Foreign-Trade Zones
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Via www.regulations.gov

Christopher Mabelitini
Director, Intellectual Property Rights & E-Commerce Division
Office of Trade
U.S. Customs and Border Protection

Mr. Mabelitini:

On behalf of the National Association of Foreign-Trade Zones (NAFTZ) and its members, I am writing in response to the Notice of Proposed Rule Making of January 21, 2025, from the U.S. Customs and Border Protection, Department of Homeland Security and the Treasury Department regarding Trade and National Security Actions and Low-Value Shipments (Docket Number USCBP-2025-0003).

NAFTZ is the collective voice of the U.S. Foreign-Trade Zone program, representing grantees, users, operators, and service providers engaged in this program which is a vital component of the U.S. economy. We respectfully submit the following comments and questions regarding the proposed rule.

NAFTZ wishes to emphasize that U.S. Foreign-Trade Zones (FTZs) have long been an integral part of the U.S. trade infrastructure—and yet are frequently overlooked in regulatory revisions such as those being proposed.

U.S. FTZ operators already report a robust set of data elements for all goods brought into the FTZ before entering the U.S. commerce through existing mechanisms, including the weekly estimate (via CBP Form 3461) and detailed entry data (via CBP Form 7501), which capture many of the data points proposed in this rulemaking (for example, the required 10-digit Harmonized Tariff Schedule classifications and other key shipment details). These established reporting practices demonstrate that FTZs are not only fully capable of providing the necessary information, but they also have a long-standing record of compliance under all applicable laws and regulations, including those enforced under Participating Government Agencies.

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In light of these points, NAFTAZ urges that any revisions to de minimis and related regulatory requirements fully account for the capabilities of U.S. FTZs. Allowing U.S. FTZs to access de minimis entry and incorporating FTZ data into the revised framework would not only streamline regulatory reporting but also enhance supply chain security by leveraging a system that already mitigates risks, including the illicit diversion of dangerous substances such as fentanyl, and simultaneously supports domestic job creation.

The NAFTAZ welcomes further discussion on these important points. Please feel free to contact me with any questions you may have.

Sincerely,

A handwritten signature in black ink, reading "Jeffrey J. Tafel, CAE". The signature is written in a cursive, flowing style.

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