

**National Association of Foreign-Trade Zones**  
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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 14, 2025, from the U.S. Customs and Border Protection, Department of Homeland Security, and the Treasury Department regarding Entry of Low-Value Shipments (Docket Number USCBP-2025-0002).

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.

While the proposed rulemaking seeks to enhance data collection by requiring additional data elements (such as clearance tracing identification numbers (i.e. BOL), country of shipment, detailed 10-digit HTSUS classifications, seller/purchaser information, and other elements), we respectfully note that U.S. Foreign-Trade Zones (FTZs) already provide a comparable—and in many cases more comprehensive—dataset through the established Admission (e214), weekly estimate (CBP Form 3461), and entry summary (CBP Form 7501) processes.

U.S. FTZ operators have demonstrated consistently high standards of compliance and transparency in reporting these critical data points. As responsible supply chain actors, operating under strict regulatory oversight and within the framework of applicable laws (including the Participating Government Agency regulations), U.S. FTZs are well positioned to assist CBP's efforts to target high-risk shipments while preserving the integrity of low-value shipment processes. Including FTZ data and expertise in any

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revised de minimis or entry procedures would enhance the overall effectiveness of the regulatory framework by ensuring that trusted and proven systems are not overlooked.

We respectfully request that the agency consider the longstanding track record and the data capabilities of U.S. FTZ operators as a valuable resource for bolstering supply chain security, especially in the fight against the trafficking of illicit substances such as fentanyl, and support any future congressional action to provide de minimis parity to U.S. FTZs.

The NAFTZ 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.

Jeffrey J. Tafel, CAE  
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