



## National Association of Foreign-Trade Zones

1000 Connecticut Avenue, NW • Suite 1001 • Washington, DC 20036  
Tel: (202) 331-1950 • Fax: (202) 331-1994 • Web site: [www.naftz.org](http://www.naftz.org)

April 13, 2005

Mr. Kelly Parkhill  
Director for Industry Support and Analysis, Import Administration  
Department of Commerce, Room 3713  
14th and Constitution Avenue NW  
Washington, DC 20230

Re: 70 *Federal Register* 12133 (March 11, 2005)  
Comments Regarding Modification of Steel Import Monitoring and Analysis  
(SIMA) System – Interim Final Rule

Dear Mr. Parkhill:

The National Association of Foreign-Trade Zones (NAFTZ) membership consists of over 800 representatives of port authorities, economic development organizations, zone operators, zone users, and other foreign-trade zone participants advocating the advancement of the U.S. Foreign-Trade Zones program. Our members' interests are representative of the interest of all general-purpose foreign-trade zones and their adjunct subzones located throughout all fifty (50) states and the Commonwealth of Puerto Rico. This membership and the economic activity with which it is associated makes the Association well-positioned to offer recommendations on the interaction between the Foreign-Trade Zones program and the Steel Import Monitoring and Analysis (SIMA) system implemented by the Department of Commerce.

We previously provided comments regarding the implementation of SIMA and its impact on foreign-trade zones in a letter dated August 19, 2002. We indicated that in the spirit of the program, licensing should occur at the time of admission of merchandise into a foreign-trade zone. The current interim rule as set out in 19 C.F.R. Section 360 has implemented this proposal. We appreciate the willingness of the Department of Commerce to consider and implement our comments in the final published Interim Final Rule.

A Request for Public Comment has been published in 70 *Federal Register* 12133, dated March 11, 2005 for the comments on Annexes II and III.

We have no comments to submit. Our main concern is that the current system for steel licensing for products at the time of admission to a foreign-trade zone and not upon Customs entry into the U.S. Customs territory continues in the Final Interim Rule.

Thank you for the opportunity to submit these comments.

Very truly yours,

Phyllis Saathoff  
President