

## Marsha Foust

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**From:** Corey W. Campbell <cwcampbell@campbelltradegroup.com>  
**Sent:** Tuesday, December 17, 2013 10:43 AM  
**To:** FTZ  
**Cc:** Pam Shupp; Randy Campbell  
**Subject:** Application for Waiver FTZ #147  
**Attachments:** Application for Waiver FTZ 147 R1.doc

Attached is the Application for Waiver for Campbell Trade Group, Inc. and FTZ #147. Please contact me if you have questions.

Regards,

Corey W. Campbell  
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## **Application for Waiver under 15 CFR 400.43(f)**

### **Instruction Sheet**

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Section 400.43(d) of the regulations of the Foreign-Trade Zones Board (15 CFR Part 400) imposes certain limitations on the functions that certain categories of parties may undertake in certain circumstances. Section 400.43(f) allows a party to apply for a waiver of the limitations in section 400.43(d) based on the party's specific situation. The Foreign-Trade Zones Board will evaluate each application for a waiver based on the specific contents of that application and the criteria set forth in section 400.43(f). Application formats are available on the FTZ Board web site: <http://www.trade.gov/ftz>.

Approval of your application will not result in any additional, standard information-collection burden.

FTZ Staff  
March 2013

Foreign-Trade Zones Board □ U.S. Department of Commerce □ 1401 Constitution Avenue, N.W., Room 21013 □ Washington, D.C. 20230 □ (202) 482-2862 □ □

## **APPLICATION FOR WAIVER UNDER 15 CFR 400.43(f)**

**The Uniform Treatment provisions of the FTZ regulations prohibit certain persons from performing certain FTZ-related functions unless granted a waiver pursuant to 15 CFR 400.43(f).**

To help us review your application as quickly as possible, please include the question number and the text of the question prior to your response to each question. Please respond to each item completely based on the information available to you. If your application contains any information that you consider to be confidential, please follow the instructions in 15 CFR 400.54(c) for its submission.

Note that, pursuant to 15 CFR 400.43(f), the Executive Secretary may solicit additional information or clarification, as necessary, based on the information you provide. If you have questions, please contact the FTZ Board staff at (202) 482-2862.

Identity of Applicant and Affected FTZ

1. State your name (individual or organization, as appropriate) as the applicant for a waiver.  
Campbell Trade Group, Inc.

2. State the specific FTZ (zone number and city/state) to which your application pertains.

FTZ #147 Reading, PA

Key Functions (15 CFR 400.43(d)(1))

3. If your application for a waiver is approved, do you propose to:

- a. Take action on behalf of the grantee of the FTZ identified in your response to Question 2, or make recommendations to that grantee, regarding the disposition of proposals or requests by zone participants pertaining to FTZ authority or activity (including activation by CBP)? If yes, explain fully. Explain the specific actions you propose to take, or the specific types of recommendations you propose to make, regarding the disposition of zone participants' proposals/requests.

As administrator, we take action as directed by the Grantee Board of Directors. Campbell Trade Group, Inc. reviews all requested changes to the FTZ and presents all requested changes to the Grantee Board of Directors for final disposition. Our recommendations are limited as to the suitability of the proposals and requests by zone participants, that they meet the Grantee and FTZ Board standards for applications and requests. Additionally, we will make recommendations regarding the construct and general well being of the zone and provide other advice to the Grantee Board of Directors upon their request. No activities are initiated unless considered and voted upon by the Grantee Board members.

- b. Approve, or be a party to, a zone participant's agreement with the grantee of the FTZ identified in your response to Question 2 (or person acting on behalf of that grantee) pertaining to FTZ authority or activity (including activation by CBP)? If yes, explain fully. Explain the specific types of agreement that you propose to approve, or to which you propose to be a party.

No. Zone participant agreements are standard form and any substantive change must be approved by the Grantee Board of Directors. Campbell Trade Group, Inc. is not a party to any Operator Agreements.

- c. Oversee zone participants' operations on behalf of the grantee of the FTZ identified in your response to Question 2? If yes, explain fully. Explain the specific oversight activities that you propose to conduct.

No.

Key Categories of Persons (15 CFR 400.43(d)(2))<sup>1</sup>

4. For the FTZ identified in your response to Question 2, do you currently engage in, or have you during the preceding twelve months engaged in a) offering/providing a zone-related product/service to or b) representing a zone participant? If yes, explain fully. Describe the type of zone-related product/service you offered or provided, or the type of representation of zone participant(s) you undertook. How often have you done so? Also explain the importance – in terms of income derived and resources committed – of offering/providing zone-related products/services, or representing zone participants, for the FTZ identified in your response to Question 2.

In regard to a), we have not provided services outside of zone administration to the zone. We have not provided zone-related products to the zone during the preceding twelve months. In response to b), yes we assisted C& J Clarks America with alteration of their activated area. This was the only circumstance within the past twelve months. Other than zone administration, in terms of income derived and services committed, providing zone-related services and representing zone participants is a minor portion of our business. We do, however, request the authority to write applications to the FTZ Board and CBP on behalf of companies that will eventually be part of FTZ #147. Our past experience shows that companies currently located in the service area tend to desire to use our services, while companies moving into the service area use other consultants. Since companies already located in the service area are more likely to be introduced to the FTZ program by Campbell Trade Group, Inc., providing application and activation services to them is a natural extension of the pre-application work performed for those companies. For example, of the four companies currently using or preparing to use FTZ #147 since Campbell Trade Group, Inc. began acting as Administrator, we have written two of the applications to the FTZ Board and Activated one of the companies with CBP. Two of the companies used other consultants to write their applications to the US FTZ Board and three of the companies used other consultants to file Activation applications with CBP.

5. Do you stand to gain from a person's offer/provision of a zone-related product/service to, or representation of, a zone participant in the FTZ identified in your response to Question 2? If yes, explain fully (including an explanation of the nature and extent of the gain you may receive).

No.

6. With respect to the FTZ identified in your response to Question 2, are you related (within the meaning of 15 CFR 400.43(e)) to a) any person that currently engages in, or has during the preceding twelve months engaged in, offering/providing a zone-related product/service to or representing a zone participant or b) any person that stands to gain from a person's offer/provision of a zone-related product/service to or representation of a zone participant? If yes, explain fully.

No.

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<sup>1</sup> Although the questions in this section are written in the present tense, if you are seeking a waiver because you at some point in the future intend or expect to fall within one of the key categories of persons, then please answer these questions in the context of your intent or expectation.

7. Please provide any other information that you would like the FTZ Board to consider in evaluating your request.

N/A.