



United States Department of Commerce
The Foreign-Trade Zones Board
Washington, D.C. 20230

November 20, 2014

Randy P. Campbell
President
Campbell Trade Group, Inc.
P.O. Box 3478
York, PA, 17402

Dear Mr. Campbell:

I am pleased to inform you that the Foreign-Trade Zones (FTZ) Board has voted to approve the pending waiver request submitted by Campbell Trade Group, Inc. (CTG) under 15 CFR 400.43(f), subject to certain conditions/limitations.

As set forth in more detail in the attached, this approval generally authorizes CTG to continue to provide zone-related products/services or representation to its existing customer in FTZ 147, as identified in the waiver request.

A copy of the approval documents, signed by the Board members, is attached, as is a related memorandum from the Executive Secretary.

Please let me know if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew McGilvray".

Andrew McGilvray
Executive Secretary

Attachments

RESOLUTION

Waiver Request under 15 CFR 400.43(f) from Campbell Trade Group

The FTZ Board has considered the request from the Campbell Trade Group (CTG) for a waiver pursuant to 15 CFR 400.43(f). The pending request seeks to enable CTG to offer/provide zone-related products/services to or represent "zone participants" (15 CFR 400.2(x)) of FTZ 147 (Reading, PA area) while also undertaking a "key function" for the zone's grantee (*i.e.*, making "recommendations" to the grantee board of directors "as to the suitability of the proposals and requests by zone participants").


DECISION

Upon consideration and review of the recommendations in the memorandum of the Executive Secretary which analyzes the request, the Board would approve a waiver for CTG with the following conditions or limitations in order that the risk of non-uniform treatment can be mitigated to a satisfactory degree:

- 1) CTG is limited to continuing to provide zone-related products/services or representation to the existing customer identified in its waiver request;
- 2) Approval of the waiver would be for an initial period of five (5) years, with the possibility of renewal upon request; and,
- 3) The FTZ Board staff will monitor participants in the zone. If checks were to reveal abuse of position by CTG in undertaking the key function on behalf of the grantee, as determined by the Board in its sole discretion, the Board could "discontinue" the waiver under 15 CFR 400.43(f).

I hereby vote to approve a waiver for the Campbell Trade Group for its identified activities in FTZ 147 with the conditions/limitations described above.

Signed: _____


Paul Piquado
Assistant Secretary of Commerce
for Enforcement and Compliance

Date: 19 NOVEMBER 2014

RESOLUTION

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The FTZ Board has considered the request from the Campbell Trade Group (CTG) for a waiver pursuant to 15 CFR 400.43(f). The pending request seeks to enable CTG to offer/provide zone-related products/services to or represent "zone participants" (15 CFR 400.2(x)) of FTZ 147 (Reading, PA area) while also undertaking a "key function" for the zone's grantee (*i.e.*, making "recommendations" to the grantee board of directors "as to the suitability of the proposals and requests by zone participants").

DECISION

Upon consideration and review of the recommendations in the memorandum of the Executive Secretary which analyzes the request, the Board would approve a waiver for CTG with the following conditions or limitations in order that the risk of non-uniform treatment can be mitigated to a satisfactory degree:

- 1) CTG is limited to continuing to provide zone-related products/services or representation to the existing customer identified in its waiver request;
- 2) Approval of the waiver would be for an initial period of five (5) years, with the possibility of renewal upon request; and,
- 3) The FTZ Board staff will monitor participants in the zone. If checks were to reveal abuse of position by CTG in undertaking the key function on behalf of the grantee, as determined by the Board in its sole discretion, the Board could "discontinue" the waiver under 15 CFR 400.43(f).

I hereby vote to approve a waiver for the Campbell Trade Group for its identified activities in FTZ 147 with the conditions/limitations described above.

Signed: _____


Timothy E. Skud
Deputy Assistant Secretary of the Treasury
(Tax, Trade and Tariff Policy)

Date: _____





Memorandum for: Paul Piquado
Assistant Secretary of Commerce
for Enforcement and Compliance

Timothy E. Skud
Deputy Assistant Secretary of the Treasury
(Tax, Trade, and Tariff Policy)

From: Andrew McGilvray *AMG*
Executive Secretary
Foreign-Trade Zones Board

Through: Scott McBride *SM*
Senior Attorney, Office of the Chief Counsel
for Trade Enforcement & Compliance

Date: September 25, 2014

Subject: Waiver Request from Campbell Trade Group under 15 CFR 400.43(f)

BACKGROUND

The Regulations Have a Default Bar on Certain Conflicts of Interest but Allow for Waivers

Section 81n of the FTZ Act (19 U.S.C. 81a-81u) requires that grantees provide "uniform treatment under like conditions" for zone participants¹. In 2007, the Foreign-Trade Zones Board (the Board) published a *Federal Register* notice citing "[c]oncerns [that] ha[d] been raised to the FTZ Board" and inviting comment "related to potential conflicts of interest in local access to FTZ procedures" in the context of the FTZ Act's uniform treatment requirement. In 2012, after an extensive notice-and-comment process, the Board adopted regulations (15 CFR Part 400) that include a provision (§ 400.43(d)) designed to prevent certain conflicts of interest within a given FTZ.² Responding to comments on the similar

¹ 15 CFR 400.2(x) defines a "zone participant" as "a current or prospective zone operator, zone user, or property owner."

² A "person" in a "key category" may not undertake any "key function" for a grantee. Key categories are: (1) A person that engages in, or has during the preceding 12 months engaged in, offering/providing a zone-related product/service to or representing a user of a zone; (2) A person that stands to gain from a person's offer/provision of a zone-related product/service to or representation of a user of a zone; or (3) A person "related" to the persons in (1) or (2). Key functions are: (1) Taking action on behalf of a grantee, or making recommendations to a grantee, regarding the disposition of proposals or requests by zone users pertaining

regulatory provision proposed by the FTZ Board in 2010, section 400.43(f) of the 2012 regulations also allows a party to request a waiver by the Board of the requirements of § 400.43(d) based on the circumstances presented by the party. Absent approval of a waiver, “existing business arrangements” which would otherwise be precluded by § 400.43(d) were required to be terminated or brought into compliance no later than February 28, 2014.

Pending Request for Waiver from Campbell Trade Group

Now pending is a request from the Campbell Trade Group (CTG) for a waiver pursuant to 15 CFR 400.43(f). The waiver request pertains to CTG’s activities as “administrator” of FTZ 147 (Reading, PA area). The pending request indicates that CTG currently has one user of FTZ 147 to which it provides representation and seeks to allow CTG to offer/provide zone-related products/services to or represent zone participants of FTZ 147 while also undertaking a “key function” for the zone’s grantee (*i.e.*, making “recommendations” to the grantee board of directors “as to the suitability of the proposals and requests by zone participants”).

KEY ARGUMENTS PRESENTED BY THE REQUESTER

Key arguments presented in the waiver request – attached in full at Appendix 1 – include the following:

- “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.”
- “Our past experience shows that companies currently located in [FTZ 147’s] 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.”

to FTZ authority or activity (including activation by CBP); (2) Approving, or being a party to, a zone user’s agreement with the grantee (or person acting on behalf of the grantee) pertaining to FTZ authority or activity (including activation by CBP); or (3) Overseeing zone users’ operations on behalf of a grantee.

STANDARD FOR DECISIONS

The regulatory standard (in Sec. 400.43(f)) for decisions on waiver requests is as follows:

In deciding whether to grant a waiver, the Board shall determine whether there is an unacceptable risk that the waiver would result in non-uniform treatment being afforded by the person undertaking a key function(s) listed in paragraph (d)(1) of this section. In its assessment, the Board shall consider the specific circumstances presented, including the nature and extent of the person's involvement in undertaking a key function(s) listed in paragraph (d)(1) of this section. In general, the more significant the requester's involvement or interest in the undertaking of a key function(s) listed in paragraph (d)(1) of this section or activity(ies) identified in paragraph (d)(2)(i) of this section, the greater the risk will be that non-uniform treatment will be afforded and, thus, the less likely it will be that a waiver will be granted. The Board may attach to individual waivers such conditions or limitations (including, for example, the length of time a waiver is to be effective) as it deems necessary.

The Preamble to the regulations included the following additional explanation pertaining to the waiver provision:

[I]n response to comments received, we have added new Sec. 400.43(f) that will allow the Board to issue case-by-case waivers of the provision in Sec. 400.43(d) that bars certain categories of persons from performing certain key functions. This approach strikes an appropriate balance in order to avoid the types of broad, negative impacts projected by commenters while continuing to reflect the fact that a zone grantee often has a monopoly in its region for valuable access to the federal privilege of FTZ use (with zone participants reluctant to make uniform treatment-related complaints to the FTZ Board because of a perceived risk of jeopardizing key relationships with grantees or with third parties undertaking key functions on behalf of grantees)... In considering whether to approve an individual application for a waiver, the Board will take into account the specific circumstances presented, and the Board will also impose conditions on individual waivers, as warranted. As raised by one commenter, a key factor the Board will consider is whether a grantee's specific arrangement presents a significant risk that zone users will experience implied pressure to procure a particular private party's services as a condition of obtaining access to the federal FTZ program.

DISCUSSION

As detailed above, the regulatory standard for decisions on waivers includes: "In general, the more significant the requester's involvement or interest in the undertaking of a key function(s) listed in paragraph (d)(1) of this section or activity(ies) identified in paragraph (d)(2)(i) of this section, the greater the risk will be that non-uniform treatment will be

afforded and, thus, the less likely it will be that a waiver will be granted.” The “key function(s) listed in paragraph (d)(1)” include “[t]aking action on behalf of a grantee, or making recommendations to a grantee, regarding the disposition of proposals or requests by zone participants pertaining to FTZ authority or activity (including activation by CBP)” The “activity(ies) identified in paragraph (d)(2)(i)” are “engag[ing] in... offering/providing a zone-related product/service to or representing a zone participant in the grantee's zone.”

Regarding the significance of CTG's involvement or interest in “the undertaking of a key function(s),” the pending waiver request indicates that CTG “reviews all requested changes to the FTZ” and makes recommendations “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.” Therefore, it appears that any potential zone user wishing to obtain access to FTZ 147 must first have CTG review – and make a recommendation regarding – its application. CTG's role in reviewing and making recommendations regarding all applications to use FTZ 147 means that CTG has significant control or influence over the sole mechanism for potential users to gain access to FTZ 147. That significant control or influence would extend beyond the outcome of that process (*i.e.*, the recommendations that CTG ultimately makes) to the amount of time CTG takes to review individual applications. The effect of additional time taken by CTG to review a particular application would be to delay the financial benefits of FTZ use for the potential user, while any denial of sponsorship by FTZ 147 based on such a recommendation by CTG would entirely deprive the potential user of the financial benefits of FTZ use.

Regarding the significance of CTG's involvement or interest in “engag[ing] in... offering/providing a zone-related product/service to or representing a zone participant in the grantee's zone,” CTG's waiver request indicates that during the past twelve months the company “assisted [FTZ 147 user] C & J Clarks America with alteration of their activated area” of the zone. The request further states that CTG is “requesting the authority to write applications to the FTZ Board and CBP on behalf of companies that will eventually be part of FTZ #147” and that “of the four companies currently using or preparing to use FTZ #147 since [CTG] began acting as Administrator, we have written two of the applications to the FTZ Board and Activated one of the companies with CBP.”

CTG's “involvement or interest” in offering/providing a zone-related product/service to or representing zone participants is appropriately gauged in terms of both current and potential future customers of CTG in FTZ 147. In particular, a firm's “interest” in providing products/services to or representing companies clearly can relate to clients the firm would like to solicit in the future. CTG's website appears to provide one indication of the firm's interest in offering/providing zone-related products/services to or representing zone participants. Specifically, on the main page of the firm's website (see printout attached as Appendix 2), the first of the listed specialized services” that CTG offers is “FTZ Consultants - Provide FTZ consulting services to current and potential grantees, operators, and users of the U.S. Foreign-Trade Zones program.” The website also includes numerous other references to the FTZ program and the related services that CTG offers. Given the

prominence of FTZ-related consulting among the services that CTG promotes through its website, CTG's "involvement or interest" in offering or providing zone-related products/services to or representing participants in a given zone does not appear to be insignificant. Further, the greater CTG's interest in selling its products/services to or representing participants in a given zone, the greater the risk of CTG using leverage such as the potential for delay in reviewing applications – without which companies cannot obtain the designation necessary to begin receiving FTZ benefits – as a means of encouraging companies to choose CTG's products/services or representation over competing providers of products/services or representation.

If the Board determines that there is an unacceptable risk of non-uniform treatment associated with approval of the waiver without limitation or condition, the Board should also consider the impact on the zone participant (C & J Clarks America) that the request indicates already procures representation from CTG. It appears likely that such an existing customer of CTG is dissimilarly situated relative to potential new customers in that the existing customer has already invested in – and potentially become reliant on – CTG's representation. Further, with regard to the degree to which FTZ 147's arrangements with CTG present "a significant risk that zone participants will experience implied pressure" to procure CTG's products/services in order to obtain access to zone, it appears that such implied pressure is inherently less likely to occur after a participant has made a decision on procuring products/services from CTG.

CONCLUSIONS AND RECOMMENDATIONS

As noted, 15 CFR 400.43(f) states that "[i]n its assessment [of waiver requests], the Board shall consider the specific circumstances presented, including the nature and extent of the person's involvement in undertaking a key function(s) listed in paragraph (d)(1) of this section. In general, the more significant the requester's involvement or interest in the undertaking of a key function(s) listed in paragraph (d)(1) of this section or activity(ies) identified in paragraph (d)(2)(i) of this section, the greater the risk will be that non-uniform treatment will be afforded and, thus, the less likely it will be that a waiver will be granted." As outlined above, given the key function that CTG would undertake if granted a waiver in FTZ 147, a potential new user of the zone would be unable to achieve FTZ benefits without CTG having reviewed and made a recommendation to the grantee regarding the user's application. As also outlined above, providing zone-related products/services to, or representing, zone participants appears to be an important line of business for CTG. Therefore, it appears CTG's involvement or interest in providing those products/services or representation is not insignificant.

This analysis is not specific only to CTG, but would apply to any company in CTG's situation. The greater such a company's involvement or interest in selling its products/services to, or representing, participants in a given zone, the increased possibility that the company could use its leverage to the disadvantage of existing and possible future competitors. In that context, a consulting company that has the role of reviewing and

making recommendations to a zone's grantee "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" (in the words of CTG's waiver request) could delay or block the zone's sponsorship of potential users, without which those companies could not obtain FTZ benefits, as a means of encouraging companies to choose its products/services or representation over competing providers of products/services or representation. The Board's adoption of 15 CFR 400.43(d) and the related waiver provision in 15 CFR 400.43(f) "strikes an appropriate balance in order to avoid the types of broad, negative impacts projected by commenters while continuing to reflect the fact that a zone grantee often has a monopoly in its region for valuable access to the federal privilege of FTZ use (with zone participants reluctant to make uniform treatment-related complaints to the FTZ Board because of a perceived risk of jeopardizing key relationships with grantees or with third parties undertaking key functions on behalf of grantees)."³

The Preamble to the Board's regulations also states that "a key factor the Board will consider is whether a grantee's specific arrangement presents a significant risk that zone users will experience implied pressure to procure a particular private party's services as a condition of obtaining access to the federal FTZ program."⁴ Given the facts and analysis outlined above, it appears there is an unacceptable risk that an approval of a waiver for FTZ 147 without condition or limitation could result in the affording of non-uniform treatment to different private parties. Therefore, I recommend that the Board approve the requested waiver only as it pertains to CTG's existing customer (as discussed below).

The degree to which FTZ 147's arrangement with CTG "presents a significant risk that zone users will experience implied pressure" to procure CTG's products/services in order to obtain access to zone benefits appears likely to vary significantly depending on whether that zone participant has already made a decision on procuring products/services from CTG. In particular, it appears that such implied pressure is inherently most likely to occur prior to a participant's deciding to procure products/services from a particular provider. Further, not allowing CTG to continue to provide products/services to the existing customer it has cited could cause hardships to that customer and unreasonably interfere with established contracts and commercial relations between CTG and its pre-existing business partner. Thus, in accordance with the requirements and spirit of the regulation, I further recommend that the Board approve the requested waiver with a condition that CTG be able to continue to provide products/services or representation to the existing customer cited in its request (C & J Clarks America).

Finally, I recommend the waiver should be limited in time. The waiver process is relatively new, and therefore the Board has no past experience on which to rely in gauging the likely impact(s) of a waiver approval. By limiting the waiver period initially, the Board could

³ *Preamble, Foreign-Trade Zones in the United States, Final Rule*, 77 FR 12112, 12131 (Feb. 28, 2012).

⁴ *Id.*

assess any proposed renewal request near the end of the waiver's initial effective period, and consider the actual experience of zone participants while the waiver had been in place.

Summary

In sum, based on consideration of the information presented by the requester in the applicable regulatory context (as outlined above), I recommend a waiver for CTG's identified activities in FTZ 147 with the following conditions or limitations⁵:

- 1) CTG is limited to continuing to provide zone-related products/services or representation to the existing customer identified in its waiver request;
- 2) Approval of the waiver would be for an initial period of five (5) years, with the possibility of renewal upon request; and,
- 3) The FTZ Board staff will monitor participants in the zone. If checks were to reveal abuse of position in undertaking the key function on behalf of the grantee, as determined by the Board in its sole discretion, the Board could "discontinue" the waiver under 15 CFR 400.43(f).

⁵ § 400.43(f) states that "[t]he Board may attach to individual waivers such conditions or limitations (including, for example, the length of time a waiver is to be effective) as it deems necessary."

Appendix 1:
Waiver Request from
Campbell Trade Group

Application for Waiver under 15 CFR 400.43(f)

Instruction Sheet

This collection of information contains Paperwork Reduction Act (PRA) requirements approved by the Office of Management and Budget (OMB). Notwithstanding any other provision of law, no person is required to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the PRA unless that collection of information displays a currently valid OMB control number. Public reporting burden for this collection of information is estimated to average one hour, including time for reviewing instructions and responding to the specific questions. Persons wishing to comment on the burden estimate or any aspect of this collection of information, or offer suggestions for reducing this burden, should send their comments to the ITA Reports Clearance Officer, International Trade Administration, U.S. Department of Commerce, 14th and Constitution Avenue, NW, Washington, DC 20230.

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))¹

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.

¹ 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.

Appendix 2:
Printout of Main Website Page
for Campbell Trade Group



Campbell Trade Group, Inc.

[Home](#)[Services](#)

- » [FTZ Consulting](#)
- » [Free Zones](#)
- » [FTZ Inspections](#)
- » [Zone Administration](#)
- » [Trade Consulting](#)
- » [Economic Development](#)
- » [C-TPAT](#)

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Foreign-Trade Zone Consultants

Campbell Trade Group, Inc. (CTG) is a trade facilitation, foreign-trade zone consulting, and economic development firm. Headed by President and CEO, Randy P. Campbell, CTG operates in seven areas of expertise. Each of the following specialized services accommodates specific aspects of domestic and international trade:

- FTZ Consultants - Provide FTZ consulting services to current and potential grantees, operators, and users of the U.S. Foreign-Trade Zones program.
- Free Zones - Create zone specific programs that encourage development of customs processes, protocols, and procedures for Free Zones with a particular focus on the international best practice and international investor needs.
- Foreign-Trade Zone Inspections (FTZI) - Conduct reviews of FTZ's worldwide for Customs or as Customs would. FTZI also conducts on site training for Customs or individual companies.
- Foreign-Trade Zone Administration - Campbell Trade Group is the Foreign Trade Zone Administrator for FTZ 147 in central Pennsylvania, and FTZ 8 in Toledo, Ohio.
- Economic Development - Provide business attraction strategies, redevelopment planning and zoning and land use analysis.
- Trade Consulting - Concentrate on helping businesses, developers, municipalities and foreign trade zone participants achieve and maintain compliance with international trade practices as set forth by U.S. trade laws.
- C-TPAT - Guides both U.S. and overseas-based companies through the maze of government procedures necessary to become participants in the U.S. C-TPAT program.

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