



October 1, 2003

Tom Ridge  
Secretary  
U.S. Department of Homeland Security  
Washington, D.C. 20528  
Fax: 202-282-8236

Dear Secretary Ridge:

Today marks the three-year anniversary of the implementation of the Caribbean Basin Trade Partnership Act (CBTPA) and the African Growth and Opportunity Act (AGOA). Today also marks the eleven month anniversary of the implementation of the Andean Trade Promotion & Drug Eradication Act (ATPDEA). The members of the American Apparel & Footwear Association (AAFA), the national trade association of the apparel and footwear industries, strongly supported passage of each of these important trade preference programs and are today among the largest users of these programs. These programs have not only benefited AAFA's members, but have greatly assisted in the economic development of the beneficiary countries.

On a day where we should be celebrating the anniversary of the full implementation of these seminal programs, however, I regret to note that the U.S. government has still not yet published final clear rules on how AAFA members can operate under these programs.

The Bureau of Customs and Border Protection issued interim regulations for each program in March 2003 (March 21 for CBTPA & AGOA, March 25 for ATPDEA). The interim regulations did not clearly address or left vague many specific issues that will hopefully be clarified in the final regulations. Furthermore, without final regulations, U.S. apparel and footwear firms lack the regulatory certainty they need to fully take advantage of the benefits of each program. AAFA submitted comments in May 2003 that offered detailed solutions to many of the specific problems found in the interim regulations for each program.

After waiting for three years, I am writing today to urge you to swiftly publish the final regulations for CBTPA, AGOA, and ATPDEA as soon as possible. I hope that the final regulations incorporate many of AAFA's comments.

Thank you for your time and consideration in this matter. If you have any questions, please contact Steve Lamar, AAFA's Senior Vice President, at 703-797-9041.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Burke". The signature is written in a cursive style with a large, stylized initial 'K'.

Kevin M. Burke  
President & Chief Executive Officer

CC:

- U.S. Secretary of Commerce Donald Evans
- U.S. Secretary of the Treasury John Snow
- U.S. Trade Representative Robert Zoellick
- Commissioner of Customs & Border Protection Robert Bonner