

COMMERCIAL CUSTOMS OPERATIONS

ADVISORY COMMITTEE

(COAC)

U.S. Customs and Border Protections

Virtual Quarterly Public Meeting

Wednesday, March 17, 2021

1:05 p.m. - 3:54 p.m.

By: Chelse Sander

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OPENING REMARKS

CBP Office of Trade Relations Deputy Executive Director Valarie Neuhart opened the meeting. After calling the formal roll call of COAC Members, she opened the floor for opening remarks.

CBP Acting Commissioner Troy Miller thanked everyone for participating in the meeting and explained that it was his first event. After introducing himself and providing a brief background, he gave a brief update on the Synthetics Trafficking and Overdose Prevention (STOP) Act. The Mandatory Advanced Electronic Information for International Mail Shipments rule was signed in and published in the Federal Register on March 15, 2021. This will strengthen how advanced electronic data on packages and mail is shared with the Postal Service and CBP. There has been continued seizures of illicit COVID-19 related products, including more than thirty million counterfeit facemasks, 300,000 hand sanitizers, and more than 177,500 FDA-prohibited test kits.

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CBP Deputy Commissioner Robert Perez thanked everyone for their continued work. Explaining the importance of the 21st Century Customs Framework and that over two years ago the initial announcement of the effort was made. There has been an incredible effort to identify key areas of modernization and development of strategies to implement them. He formally announced the creation and formation of a joint government-industry group: the 21st Century Customs Framework Taskforce. The task force will be refining and advancing the legislative package to provide legal flexibility so that all modernization barriers and outdated requirements are being eliminated.

Treasury Deputy Assistant Secretary Timothy Skud is looking forward to the discussions on the USMCA guidance. Although it is not in the Treasury yet, he reported that there draft regulations as they make progress.

Additionally, he is anticipating the report from the Bond Working Group concerning the Buy America Act and is looking forward to its subsequent discussion.

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After echoing welcome and thanks to those participating in the public meeting, DHS Assistant Secretary Bridget McGovern noted that the trade policy agenda highlights several areas that are connected with the mission of DHS. Specifically, addressing the widespread human rights exploitation and forced labor programs targeting minorities in the Xinjiang region of China. Addressing President Biden's executive orders, she noted that although they have a wide scope, they directly relate to economic and trade issues and are currently being enforced by those working within Trade and Economic Security.

Homeland Security Investigations Immigration and Customs Enforcement (HSI/ICE) Acting Executive Associate Director Patrick Lechleitner introduced HSI as the principal investigative arm of DHS with 3,000 task force officers that represent the strategic federal, state, and local partners to combat international criminal organizations. Operation Stolen Promise (OSP) was launched last year and has resulted in the seizure of over \$39 million illicit

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proceeds and over \$18.8 million in disrupted transactions or recovered funds.

OSP 2.0 was launched in November of 2020 and focuses on therapeutics and vaccines relating to COVID-19 and has seized over 100 unapproved or illegal therapeutics since its launch. Furthermore, the IPR Center has contributed to the development of law enforcement identification fact sheets for companies' respective COVID-19 vaccines and/or therapeutics, including the Pfizer BioTech vaccine, Moderna vaccine, Johnson & Johnson vaccine, Gilead therapeutic, and Eli Lilly therapeutic. This has since been shared across federal, state, and local government agencies including the U.S. Attorney's Office, and the state and local police.

COAC Trade Co-Chair Lenny Feldman reflected that one year ago the COVID-19 pandemic and the adjustment to a new normal. There have been drastic changes, new challenges, and new opportunities within trade's agenda and policy and has led to flexible, strategic, and innovative thinking from those within the trade community and is the

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mindset of COAC as they move forward with their recommendations.

COAC Trade Co-Chair Brian White gave appreciation to CBP and its vision for trade under the 21st Century Framework of transformational reform. The progress that's been made has created an opportunity to fully engage with all agencies with a role in cross-border regulatory enforcement and to define what its future will look like.

NEXT GENERATION FACILITATION SUBCOMMITTEE

Subcommittee Co-Lead Cindy Allen announced that although the Subcommittee has no recommendations, they will be providing an update on the status of the workgroups including the E-commerce Taskforce. The task force has met over the past quarter to gain an understanding of the pilot results and to create an outline of the impact of the Type 86 pilot and Section 321 pilot on CBP and trade. They feel that robust testing must be done to verify that when there are multiple parties involved within a transaction to provide data on what regulations are needed in e-commerce.

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ONE UNITED STATES GOVERNMENT (1-USG) WORKING GROUP

Working Group Lead Madeleine Veigel detailed that the group was established as a way to collaborate with CBP on the efforts between government agencies and industry stakeholders. 1-USG does not have any recommendations at this time but will be providing an update on the work that they have been doing.

Over the last quarter they have held several conference calls, including discussions with the Fish and Wildlife Services to determine the status of the implementation of the ACE message set; they have received updates from CBP and their effort to outline disclaim guidelines concerning Participating Government Agency (PGA) data and have compiled a list of PGA documents that are still required in paper format as they migrate to a paperless system; the working group has also discussed the status of the Global Business Identifier and its proof of concept.

RE-IMAGINED ENTRY PROCESS WORKING GROUP

Working Group Co-Lead J.D. Gonzalez stated that they do not have recommendations for this quarter. The Working

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Group has changed its name to the Re-Imagined Entry Process from the Unified Entry Process as they have moved on to the next phase of entry process modernization. They have nine scheduled meetings to review and determine the feasibility of the group's efforts since they began in September of 2019.

EMERGING TECHNOLOGIES WORKING GROUP

Working Group Co-Lead Celeste Catano explained that they will be on hiatus for the next quarter. However, they will continue to offer practical strategic approaches, solutions, and recommendations concerning new and emerging technologies for trade. The group only met once last quarter to attend a briefing by the University of Houston on the efforts to investigate and explore emerging technologies to address e-commerce challenges through their study: Addressing Cross-Border E-Commerce Challenges with Emerging Technologies.

Executive Director for Trade Policy and Programs and CBP Lead John Leonard elaborated that the responsibility of this Subcommittee is to enhance trade and government

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processes, policies, and programs so trade and CBP are better positioned for the future. Expounding, on the formation of the 21st Century Customs Framework Taskforce as a vehicle for transparency so that COAC and the entire trade community are aware of important details and legislation relating to the 21st Century Customs Framework.

PUBLIC COMMENT

Public comment was submitted by Transportation Intermediaries Association (TIA) that urges CBP to expand the CTPAT program eligibility criteria to include third-party logistics providers. CTPAT-certified companies receive priority processing with reduced inspections that enable the movement of goods within a safe and secure freight network. Currently, CBP interprets the Safe Port Act as non-asset-based property brokers to exclude and prohibit third-party logistics companies from participating in the program yet allows non-asset-based brokers such as non-vessel owning common carriers. TIA respectfully asks for a review of the trucking companies serving U.S. ports and intramodal rail tracks that do not

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cross borders as it creates disadvantages and safety gaps within the supply chain.

Cargo and Conveyance Secure Executive Director Thomas Overacker thanked TIA for their submission and assured them that they are always looking to improve the CTPAT program.

A question posed on the web was read by Trade Relations Deputy Executive Director Neuhart. The question was as follows: Is there a system in place to monitor the status of COAC recommendations. Deputy Director Neuhart responded that All COAC recommendations are posted on the CBP.gov website.

RAPID RESPONSE SUBCOMMITTEE

BROKER EXAM MODERNIZATION WORKING GROUP

Working Group Co-Lead John Van Wallaghen informed COAC that they have no recommendations but will be providing a brief update on the group. Over the last quarter, discussions focused on the preparations for the April exam, and they have provided seven exam questions for

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CBP's consideration. For the April broker exam, they posted the announcement on CBP's website and spent a significant amount of time and effort preparing for the launch of the first remotely proctored exam.

**UNITED STATES - MEXICO - CANADA AGREEMENT (USMCA)
WORKING GROUP**

COAC Lead Kathy Wilkins elaborated that the USMCA Working Group continues to review the implementing instructions addendum published on January 12, 2021, which leads to the end of the restrained enforcement on July 1, 2021. She also reported that CBP has advised that the final Uniform Regulations package will be completed by 7/01/21, as mandated by the Implementation Act. She notes that the rules of origin continue to be a disruption source and there is a lack of understanding and application of the regional content value.

Subcommittee CBP Lead and Trade Policy and Programs Executive Director John Leonard gave appreciation to COAC for their assistance as the broker exam transitions towards becoming a remote exam. Regarding the USMCA, he

hopes the uncertainty trade has will be resolved when the regulations are published by July 1 and they will continue to work with all stakeholders on all issues.

PUBLIC COMMENT

Deputy Director Neuhart read a follow-up question from the last public comment period, that if there is a system in place to monitor the status of formal COAC recommendations. She explained that there is a database that is maintained and monitored by GSA that specifically has all FACA committees and the recommendations that are submitted.

COAC Member Kate Weiner emphasized how the USMCA Center should be the go-to for continued support for exports and assistance for U.S. exporters as well.

COAC Trade Co-Chair Lenny Feldman added that before July 1st, there are urgent issues, specifically within the audio industry, that need to be addressed. He announces that they are aware and understand that it is a technical

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issue and although they cannot elaborate further, he did want to notate that for the public.

INTELLIGENT ENFORCEMENT SUBCOMMITTEE
ANTI-DUMPING AND COUNTERVAILING DUTY (AD/CVD)
WORKING GROUP

Working Group Lead Lisa Gelsomino began by informing COAC that CBP issued Cargo Service Messaging Service (CSMS) Message number 46031819, which involves third country AD/CVD case numbers in ACE and the case numbers allow importers to enter merchandise that has a CBP country of origin. CBP found a glitch in ACE between October 5, 2019, through October 28, 2021, where ACE did not allow importers to file these AD/CVD entries with the third country case numbers and not triggering any duties that were due. CBP has asked importers to review their entries during this period for any corrections to properly declare the case numbers for these cases and importers were able to make post-summary corrections, however, there were concerns about the acceptance of tender. Due to these concerns, CBP has extended the deadline to May 3, 2021, under CSMS message number 46587197. The Working

Group will be discussing this more thoroughly at the next group meeting.

Ms. Gelsomino stated that AD/CVD has over \$5 million in uncollected debt with a large portion from non-resident importers. However, CBP does not have a clear jurisdiction to pursue importers without American assets and debt keeps accruing. The working group will be looking at its authority under various regulations and executive orders to develop recommendations.

BOND WORKING GROUP

Co-Lead Lisa Gelsomino stated that they have spent most of their time looking at CBP's monetary guidelines for setting bond amounts. As the documents have not been updated since 1991, it has taken longer than anticipated to bring it up to date and operate within ACE. On March 18, 2021, the group will meet virtually to wrap up the final comments on the document and CBP's process for review before publishing it publicly. She reiterated that nothing will be changing or modifying how bonds are

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calculated currently, it's only to bring the guidelines up to date.

Additionally, CBP will be putting out an advanced notice of proposed rulemaking around summertime that will be focusing on how the formula should change. For example, 70-80% of bonds are \$100,000 and under, which is what the formula will be looking at and will allow the trade community to provide feedback. Again, this will only be advance notice of proposed rulemaking, so there won't be any major changes. Finally, Ms. Gelsomino explained that they are also focusing on issues concerning e-Bond. E-Bond has been in its pilot stage since 2015 and they are working on ways they can bring in additional functionality that was not in the initial pilot.

Subcommittee CBP Lead and Executive Director of Trade Remedy Law Enforcement Ana Hinojosa emphasized the amount of work that is being done by the AD/CVD Working Group and the Bond Working Group. She gave appreciation to all the group members and the Working Group leads on their

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efforts and leadership. She is looking forward to what they will accomplish next.

INTELLECTUAL PROPERTY RIGHTS (IPR) PROCESS MODERNIZATION WORKING GROUP

Working Group Co-Lead Jody Swentik explained that the group has reevaluated the recommendations provided in April 2020 and split into three teams to expand on, further develop, and align the previous recommendations. Each team focused on one of the following recommendations: 010434 on sharing detention information, 010435 on photographic standard guidelines, and 010436 on looking at the data-driven CBP seizure process.

Ms. Swentik informed COAC that the first team has expanded upon recommendation number 010434 with three subsequent recommendations. The first recommendation is that when CBP suspects IPR violations triggered by something seen on goods or their packaging, the image(s) should be shared with the importer of record prior to detention or with the notice of detention. Furthermore, COAC recommends that CBP should adopt consistent

procedures to make images readily available and transmitted to the rights holder quickly after receipt of a request, especially when images were produced at the time of inspection while making a decision. The third recommendation relating to recommendation number 010434 is for CBP to notify the rights holder of its decision when redacted images are shared with the rights holder prior to the seizure.

The second group developed two recommendations based on recommendation number 010435. First, COAC recommends the "Photographic Standards Guide" to define specific requirements relating to image file type(s), such as minimum standards for product, interior and exterior packaging and label photos (as allowed by regulations), and acceptable delivery methods via electronic means. COAC also recommends expediting the distribution of the guide in PDF format to be posted on cbp.gov for all parties to access. Secondly, COAC recommends CBP develop a web application that guides the photo-taking process, verifies the quality, and creates standard formats for

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the images to simplify information sharing with importers and rights holders.

Working Group Co-Lead Amy Smith presented the remaining three recommendations based upon recommendation number 010435. First, COAC recommends that CBP integrate technology within the seizure process by furnishing appropriate mobile hardware and software to officers and import specialists to support swift decision making. Secondly, COAC recommends CBP use a single reference number to consistently track shipments through the entire exam, detention, and seizure process. And finally, COAC recommends CBP address the significant increase in small parcel shipments by supplementing CBP officials, as appropriate, specifically at International Mail Facilities to inspect packages.

Executive Director Hinojosa thanked the three subgroups of the Working Group for their hard work and is looking forward to collaborating on the recommendations they presented. There is a lot of interest in this topic and CBP will see what is doable moving forward.

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FORCED LABOR WORKING GROUP

Working Group Co-Lead Brian White quickly provided an overview of some of the group's work over the last few months. Since December, they have finalized a revised Statement of Work among the government agencies and the group members. They have divided into three subgroups to better focus on developing work products relating to each objective outlined in the Statement of Work: Informed Compliance Fact Sheet Subgroup, Emerging Traceability Subgroup, and Forced Labor GAO Report and Metrics Subgroup.

Mr. White acknowledged and thanked CBP leadership for briefing the forced labor group on the concept of including forced labor as a priority trade issue. Mr. White further explained that COAC does not believe their role is to advise CBP on internal structuring and prioritization of subject matter topics. Mr. White said there are several factors which are critically important to consider and ensure a more holistic U.S. government-wide approach to addressing forced labor.

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Working Group Co-Lead Erika Faulkenberry presented the first recommendation which has to do with interagency collaboration and synchronization. COAC recommends CBP take a collaborative, multi-agency approach as forced labor laws, regulations, outreach, and enforcement spans multiple government agencies, including collaboration initiatives between the U.S. and international agencies. CBP should utilize the expert resources of all relevant agencies to develop a synchronized strategy and engage more extensively in dialogue and priority setting with the trade.

Ms. Faulkenberry continued with the second recommendation, which keeps the balance between inter-agency collaboration and with the trade community. COAC recommends CBP expand its collaboration and communication with trade sectors and industries, identifying and sharing best practices, including government to industry efforts to minimize forced labor in supply chains as highlighted in the 'Industry Collaboration White Paper' submitted during COAC's public meeting July 2020. She then continues by presenting the third recommendation

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from COAC which is for CBP, and consistent with Government Accountability Office (GAO) 2020 Forced Labor Imports Report and as a broader interagency and trade sector strategy, develop an objective methodology to measure 'success' in combatting forced labor in the supply chain. Successful measures should be based on outcome metrics that ultimately focus on the improvement of the communities this illegal practice most impacts, rather than the number of withhold release orders and detentions issued.

Presenting the fourth and last recommendation, COAC recommends CBP to apply the same principles, tools, guidance, and outreach to forced labor as is the case with the other Priority Trade Issues (PTI), that is, "world-class expertise to design trade processes and policies that minimize cost and provide certainty, transparency, security, and predictability to members of the trade community."

Executive Director Hinojosa needed clarification on issues concerning priority trade issues. Designation of a

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priority trade issue is a very formal process that requires the Commissioner of CBP to approve it and then report out to the Congressional Committees when we add or eliminate priority trade issues. The notion of presenting it to the Forced Labor Working Group was to get feedback from stakeholders and the community as CBP prepares a draft package to potentially present to the Commissioner's office. Although she appreciates the thought behind the recommendations, it is only the initial step of the process.

Additionally, Executive Director Hinojosa feels that it is important to articulate the ongoing inter-agency collaboration already underway. There is a strategic forum in place to discuss forced labor enforcement across a broad inter-agency group under the USMCA requirement called the DHS Forced Labor Enforcement Taskforce.

PUBLIC COMMENT

The first comment from the web expresses disappointment in CBP's reversal on its stance on the use of Foreign Trade Zones (FTZ) to store products under a Withhold

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Release Order (WRO) while an importer presents its case for determination of the product. The commenter suggests that CBP will trade organizations as this reversal will affect companies as they will lose money to store products in a third-party bonded facility when they already have a facility with their FTZ location. Deputy Director Neuhart noted the comment for the record, and it will be addressed as a follow-up if needed.

A question was also asked by someone from the web. They explained that the GAO database shows a downward trend regarding implementation of recommendations by COAC over the past four years with only 5% of them implemented between 2017 and 2020. The commenter asked how COAC can still present recommendations and forge a more successful public-private partnership to achieve results?

In response, Deputy Executive Director Neuhart explained that the status of each recommendation is provided periodically and that they will need to review the database so that it reflects the status. Furthermore, it may take two to three years to accept, process, and

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implement a recommendation as some include considerations for funding, resources, technology, and/or regulatory framework to achieve implementation. She went on to state that they welcome all feedback and are open to collaboration. The success of CBP in implementation areas impacting the industry weighs heavily on their collaborative efforts with industry partners and their input is invaluable.

After no additional public comments were made, Executive Director Neuhart asked for a motion to submit the IPR Working Group recommendations and the Forced Labor Working Group. The motion was made by Ms. Cindy Allen and seconded by Mr. Mike Young. Through a roll call vote, the recommendations carry. See COAC webpage on CBP.GOV for the full list of recommendations.

COAC Trade Co-Chair Lenny Feldman directed two questions towards Executive Director Ana Hinojosa. First, he asked if she could provide any comments to the trade community on the Risk Assessment and Security Audit (RAASA) effort from the fourth quarter of 2020? His second question is

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concerning IPR, and the general costs associated with detecting, detaining, seizing, and destroying which seem to not provide the benefit of stopping infringing products before entering the United States. He asked if she was able to comment on the recommendations that were just received and if they are in line with CBP's priorities?

Addressing the RAASA question, Executive Director Hinojosa added that it is a risk analysis that is conducted by CBP's Regulatory Audit Division with specific importers in mind and the communication focused on that specific importer. So, sharing that information needs to be with them specifically. In response to Mr. Feldman's second question, Executive Director Hinojosa replied that most of the recommendations have a technology aspect or funding requirement and would have to consider the recommendation beyond face value before giving any opinion. Mr. Feldman countered with the potential of donor acceptance concepts as a possibility and Ms. Hinojosa answered that they are open to many options, but she cannot commit to anything at this point.

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COAC Trade Co-Chair Brian White followed up by stating that there needs to be the notice of proposed rulemaking on modernizing forced labor regulations before CBP can decide to do anything PTI-related and wanted to get her thoughts on it. Ms. Hinojosa replied that they are equally anxious to get the notice out as soon as possible.

Mr. Feldman added that at the end of 2020, COAC worked with CBP on prioritizing key recommendations they wanted movement on and have prioritized about 23% of the total scope of outstanding recommendations. He reassured that it would remain a top priority for COAC and those working in conjunction to help guide to achieve results. Deputy Executive Director Neuhart added that there are instances where COAC has deemed specific recommendation's no longer relevant or a priority due to peripheral changes.

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SECURE TRADE LANES SUBCOMMITTEE
IN-BOND WORKING GROUP

Working Group Co-Lead Michael Young has no recommendations to present on behalf of the group. The white paper has been portioned out to help identify technical issues concerning prior recommendations and submitted to the TSN Group. Additionally, the Working Group is focusing on the regulatory side and are identifying recommendations made relating to those changes and address those changes.

TRUSTED TRADER WORKING GROUP

Working Group Co-Lead Alexandra Latham presented that they have met four times over the quarter to discuss the recommendations regarding RAASA, its purpose, process, and what's needed to review the audit tools needed for CTPAT trade compliance. The group also worked on refining the Forced Labor Trusted Trader White Paper and they hope to finalize a draft over the next quarter.

EXPORT WORKING GROUP

Working Group Co-Lead Brenda Barnes explained that they are diligently working on the composition of its white paper. They are also working on a white paper for the 21st Century of Export it will continue to be a working document moving forward. This paper is anticipated to be complete by the June 2021 COAC Meeting.

REMOTE & AUTONOMOUS CARGO PROCESSING WORKING GROUP

Working Group Co-Lead Jody Swentik informed COAC that the group has been meeting bi-weekly to work on recommendations concerning air and truck modalities. They've identified unique ways the trade can collaborate with CBP in modernizing the process of cargo for all modes.

Working Group Co-Lead Heidi Bray added that there are many opportunities in the working group and believes that it will directly correlate with the 21st Century Customs Framework Taskforce.

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Executive Director Overacker thanked all the members and co-chairs of the subcommittee and working groups.

Although there are no recommendations currently, he recognizes the hard work that is being done. He is looking forward to what will be presented at the next meeting.

Executive Assistant Commissioner Brenda Smith appreciates all the kind words and wanted to give COAC two recommendations. The first is to recognize the constraints that COAC works under, such as funding, time, other responsibilities, and she acknowledged that the members have a good sense of that already. Secondly, she asks that COAC doesn't stop pushing to create the best trade system they possibly can.

PUBLIC COMMENT

There were no public comments made during this period.

CLOSING REMARKS

Deputy Executive Director Valarie Neuhart adjourned the meeting at 3:54 P.M.