



PINELLAS  
COUNTY  
ECONOMIC DEVELOPMENT

October 1, 2015

Mr. Andrew McGilvray  
Executive Secretary  
Foreign-Trade Zones Board  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Room 21013  
Washington, DC 20230

Re: Application for Reorganization under the Alternative Site-Management Framework

Dear Mr. McGilvray:

By way of this letter and the attached application, Pinellas County Economic Development (PCED), Grantee of Foreign-Trade Zone No. 193, respectfully requests your approval to reorganize our Zone project under the Alternative Site-Management Framework (ASF). We have included the legal authority under which PCED can establish a Foreign-Trade Zone project, a copy of which is included as an attachment to our application.

Our request is for reorganization of our current FTZ under the Alternative Site Framework; we are not adding any new sites for designation. We request that all present General-Purpose Zone sites be designated. These include:

- Site 1 – the 1771-acre St. Petersburg-Clearwater International Airport Complex located in Clearwater;
- Site 2 – the 3-acre Port of St. Petersburg located in St. Petersburg;
- Site 3 – the 96-acre area as Young Rainey STAR Center (previously known as the Pinellas Science, Technology & Research Center) in Largo;

The proposed Service Area under this application includes all of Pinellas, Hernando and Pasco Counties. The entirety of Pinellas, Hernando and Pasco Counties are within 60 statute miles of the St. Petersburg Customs Port of Entry and, therefore, meets the requirements for adjacency to the St. Petersburg Customs Port of Entry.

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The proposed reorganization would meet the needs of our area's trade community in two important ways.

First, is the need to provide access to our Zone project on a more flexible and timely basis to industrial recruits. Second, is the need to more closely coordinate with our regional economic development partners in Hernando and Pasco Counties. It was clear with our most recent recruit, HIT Promotional Products, that the company needed to receive Zone status in a timeframe much shorter than that required for processing a subzone application. We believe the shorter application timelines and the reduced FTZ Board fees to receive Usage-Driven Site status are desired by our other companies and will assist our industrial recruitment efforts in bringing more interest to FTZ 193. This, along with Pasco and Hernando Counties' desire to join FTZ 193, makes reorganizing under ASF a forward-thinking endeavor for our Zone project.

I hope that the attached application, which is incorporated herein by reference, meets your requirements for approval. If you have any questions, please feel free to call Brent Barkway at (727) 464-7411 or Mr. Greg Jones of the Foreign-Trade Zone Corporation at (251) 445-1372.

Sincerely,



Mike Meidel  
Director