

U.S. Customs and Border Protection
Office of International Trade
Office of Regulations and Rulings
Border Security Regulations Branch
1300 Pennsylvania Ave., NW (Mint Annex)
Washington, D.C. 20229

Re: Regulatory Information Number 1651-AA69, USCBP-2007-0061, Western Hemisphere Travel Initiative (WHTI)

Dear Sirs:

I am writing on behalf of I.E.Canada, Canadian Association of Importers and Exporters regarding the Notice of Proposed Rule Making (NPRM) for Documents Required for Travelers Departing From or Arriving in the United States at Sea and Land Ports-of-Entry from within the Western Hemisphere.

I.E.Canada has been a leading voice for the Canadian trade community since 1932, and serves small, medium, and large enterprises across Canada. Our membership comprises manufacturers, importers and exporters from diverse industries, as well as a range of service providers to Canada's trade community. We have a growing membership that today exceeds 800. The vast majority of our importer and exporter members trade with the United States reflective of the fact that 69 percent of Canada's trade is with the United States.

Of particular concern to our members is the impact that the WHTI will have on the movement of goods. We appreciate that the protection of citizens must be the paramount concern. However, for the economic well-being and competitiveness of both our countries, it is important that the implementation of WHTI avoids negatively impacting the admission of commercial drivers and carriers into the United States to the greatest extent possible. We therefore wish to express our support for the submissions already made by the Canadian Trucking Alliance (CTA), as well as the Canadian Chamber of Commerce, with respect to the NPRM and would like to highlight the following:

- **FAST/NEXUS Programs:** We are pleased that the Department of Homeland Security proposes to accept both the FAST and NEXUS cards as passport substitutes. As pointed out in the CTA submission, however, it is important to clarify that these cards will be accepted regardless of whether holders of these cards are crossing the border under these programs. In other words, commercial drivers would be able to present the FAST card in lieu of a passport regardless of whether they are traveling in a FAST lane, and similarly for NEXUS card holders.
- **Implementation Date and Availability of WHTI Compliant Documents:** As both the CTA and the Canadian Chamber have emphasized, WHTI should not be implemented until issues relating to the availability of WHTI compliant documents have been addressed. These include ensuring that existing passport backlogs are cleared and the resources are in place to process the influx of applications that will be generated as a result of implementing WHTI at the land border;

promoting and expanding the NEXUS and FAST programs, including streamlining the renewal process; and completing the enhanced driver's license pilot project. We would also ask that you pay particular attention to the special challenges raised by the CTA with respect to the renewal of FAST cards and passports by drivers.

- **Public Awareness Campaign:** In order to avoid unnecessary delays and confusion at the border, it is critical that the US and Canadian governments jointly develop and put in place a communications plan to ensure that the citizens of both countries are aware of both current and future requirements. We also trust that at all stages of WHTI implementation contingency plans will be developed to ensure that those individuals arriving without proper documentation are dealt with efficiently and expeditiously.

We recognize that the NPRM has already responded to some of the concerns previously raised by the Canadian trade community. We appreciate this opportunity to provide further comments and thank you for your consideration of the issues raised.

Yours very truly,

A handwritten signature in black ink, appearing to read "Mary Anderson", written in a cursive style.

Mary Anderson
President