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Sir / Madam: In reference to OMB Control Number 0607-0152, our position is AGAINST the proposed rule. The process for AES export filing is already very granular for our company. We ship from more than 40 locations in the US covering three business units each making vastly different products. Though much of our export paperwork is generated through an ERP, further breaking down of Foreign Origin HTS Codes to the country level will require: 1) extensive training of all shipping locations, 2) more time in processing each AES transaction, 3) costly programming changes to our ERP. In the ever-tightening regulatory and economic environment we find ourselves in, this proposed rule will cause undue burden on our business. Thank you.