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**NATIONAL CUSTOMS BROKERS AND  
FORWARDERS ASSOCIATION OF AMERICA, INC.**

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June 23, 2004

**Via E-mail ([fdadockets@oc.fda.gov](mailto:fdadockets@oc.fda.gov))**

Food and Drug Administration  
Dockets Management Branch (HFA – 305)  
5630 Fishers Lane  
Room 1061  
Rockville, M.D. 20852

**Re: Docket 2002N-278: Pacific Coast Council of Customs Brokers and Freight Forwarders Assns., Inc. (“PCC”) Comments, Dated May 14, 2004.**

Dear Sir or Madam:

The following is submitted by the National Customs Brokers and Forwarders Association of America, Inc. (“NCBFAA”), regarding comments to those previously filed, on May 14, 2004 and June 22, 2004, in connection with Docket 2002N-278, the Interim Final Rules on Prior Notice of Imported Food under the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (“Bioterrorism Act”) published by the Food and Drug Administration (“FDA”) in the Federal Register of October 10, 2003, (68 F.R. 58975) (hereinafter referred to as the “IFR”).

The PCC’s comments raise a number of salient additional issues that merit serious consideration in connection with the issuance of a final rule by the FDA. Because our members transmit the overwhelming majority of Prior Notices, we request that it be noted that the NCBFAA Board of Directors fully supports and endorses the PCC’s comments and urge adoption of rules in conformity therewith.

Thank you for your consideration.

Sincerely,

Harvey A. Isaacs,  
NCBFAA General Counsel

HAI/lh  
cc: NCBFAA Board of Directors  
Pacific Coast Council