

December 1, 2015

The Honorable Michael Froman
United States Trade Representative
600 17th Street, N.W.
Washington, D.C. 20508

Dear Ambassador Froman:

In accordance with section 5(b)(4) of the Bipartisan Trade Priorities and Accountability Act of 2015, and section 135(e) of the Trade Act of 1974, as amended, I am pleased to transmit the report of the Industry Trade Advisory Committee on Small and Minority Business (ITAC 11) on the Trans-Pacific Partnership (TPP) reflecting consensus majority and additional advisory opinions on the negotiated Agreement.

Sincerely,

A handwritten signature in black ink, appearing to read "Karyn Page". The signature is fluid and cursive, with the first name "Karyn" being more prominent than the last name "Page".

Karyn Page
Chair
Industry Trade Advisory Committee
on Small and Minority Business (ITAC 11)

The Trans-Pacific Partnership (TPP)

Report of the Industry Trade Advisory Committee on Small and Minority Business

December 1, 2015

Report of the Industry Trade Advisory Committee on Small and Minority Business (ITAC 11)

December 1, 2015

Advisory Committee Report to the President, the Congress and the United States Trade Representative on the Trans-Pacific Partnership (TPP)

I. Purpose of the Committee Report

In accordance with section 5(b)(4) of the Bipartisan Trade Priorities and Accountability Act of 2015, and section 135(e)(1) of the Trade Act of 1974, as amended, not later than 30 days after the President notifies Congress of his intent to enter into an agreement.

Under Section 135 (e) of the Trade Act of 1974, as amended, the report of the Advisory Committee for Trade Policy and Negotiations and each appropriate policy advisory committee must include an advisory opinion as to whether and to what extent the agreement promotes the economic interests of the United States and achieves the applicable overall and principle negotiating objectives set forth in the Trade Act.

The report of the appropriate sectoral or functional committee must also include an advisory opinion as to whether the agreement provides for equity and reciprocity within the sectoral or functional area.

Pursuant to these requirements, ITAC 11 hereby submits the following report.

II. Executive Summary of Committee Report

In general, ITAC 11 supports the TPP and believes it provides for equity and reciprocity for U.S. small and medium-sized businesses (SMEs) with the exception of the areas of concern delineated in the text of this report. We believe the TPP will, in the majority of chapters, enhance international trade opportunities while affording protections to SMEs in the Parties to the Agreement. The inclusion of the Chapter on Small and Medium Enterprises and SME references throughout; determination to achieve transparency; information made available online; and the broad scope of work of the Committee on SMEs is good news for U.S. SMEs.

However, ITAC 11 members have concerns, some serious, with certain elements of the Agreement as negotiated, including the complexity of, and some inconsistency in, the Rules of Origin as well as the allowance of increased non-originating content; provisions in the Environmental Chapter that may create trade barriers; ambiguous text on the Scope of Covered Regulatory Measures; and the inclusion of a product-specific exemption pertaining to public health measures in the Investment Chapter. Looking to implementation of the TPP, conceivable expansion of the TPP to include other members, and negotiation of other free trade agreements in the future, ITAC 11 believes enhancements can and should be made.

To maximize SME use and benefit of the Agreement, ITAC 11 recommends assistance and education for SMEs on compliance and navigation of this agreement; regular communication with and access to the "Chapter" Committees be afforded SMEs through defined communication points; governments of the Parties collaborate with the private sector including existing non-government trade facilitation organizations to provide education, training, and technical assistance; standardized training for

customs officers in all Parties be made available; and a central resource for evaluating goods classification, regulations, etc. on the SME web portal.

III. Brief Description of the Mandate of ITAC 11

ITAC 11 is mandated to provide detailed policy and technical advice, information, and recommendations regarding trade barriers, negotiation of trade agreements, and implementation of existing trade agreements affecting small and minority businesses.

IV. Negotiating Objectives and Priorities of ITAC 11

Priorities of the committee are to represent the views of small and minority business with the objective to enhance job growth and exports of goods and services by this business sector of the U.S. economy. As a further objective, the committee expresses an ongoing concern that cross-border trade be as fair as possible, transparent, and open to small and minority businesses.

V. Advisory Committee Opinion on Agreement

National Treatment and Market Access

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on National Treatment and Market Access supports the expansion of international trade opportunities afforded SMEs under the TPP while affording protections to businesses in the Parties to the Agreement. Further, it applauds the inclusion of notification procedures for import licensing and transparency in export licensing, and encourages publication of same online. We offer the following additional comments.

- a. We welcome the tariff elimination achieved on the majority of lines in the TPP. Evaluation of all tariff lines and quotas must occur to ascertain to what extent market access for U.S. exporters will be expanded.
- b. We support the text of the Agricultural Chapter of the TPP subject to completion of a thorough review of all products under the Harmonized Tariff Schedule. Our concern is that small U.S. exporters vying for minimal preferential quotas open to *all* TPP members that never provide duty-free, quota-free access will limit SME's use of the TPP. Evaluation of tariff reduction schedules and quota access must be coupled with a strict evaluation as to whether non-tariff barriers for all agricultural articles exported/trade amongst the Parties are eliminated or minimized to actually facilitate trade.
- c. We are concerned that Vietnam's prohibition or restriction of the importation of remanufactured goods until three years after the date of entry into force of the Agreement for Vietnam in Annex 2-B: Remanufactured Goods, Article 2.12.2 (Remanufactured Goods), will place SMEs at a disadvantage in a wide variety of sectors including industrial/manufacturing equipment, construction equipment, medical diagnostic and medical treatment equipment, etc.
- d. While we appreciate the intent of the text on market access for motor vehicles, we reserve full judgment, as a thorough review was not completed during the time allotted. We encourage the Committee on Trade in Goods to regularly dialog with SMEs who are well represented in automotive supply chains through a defined communication point.

Rules of Origin

ITAC 11 is concerned with the text and some Product Specific Rules of Origin as negotiated. While ITAC 11 supports the expansion of international trade opportunities afforded SMEs under the TPP, we believe the Chapter on Rules of Origin and its Annexes will not necessarily enhance, and may in effect

continue to hinder, SMEs from capturing these opportunities due to complexity of origin determination, allowance of increased non-originating content and some inconsistency in the rules. ITAC 11 offers the following general observations and comments on specific Articles.

We are pleased with the following elements in the agreement:

- a. The advance ruling procedure identified in Chapter 5, Customs Administration, which will assist SMEs in determining the eligibility of their goods for qualification of preferential treatment under the agreement.
- b. The TPP certificate of origin need not be in any prescribed format, may be submitted in English, may be submitted in written or “other” (electronic) format, and that a blanket certificate up to one year is permitted. ITAC 11 requests that a model TPP certificate of origin be provided online for use by small and medium-sized exporters.
- c. No certificate is required for shipments valued at \$1,000 or less under Article 3.23: Waiver of Certificate of Origin; however, our preference would have been a value of \$2,500. ITAC 11 requests that the equivalent amounts for other Parties to the TPP members be published online for SME access.
- d. The procedure for allowance for release of goods while origin verification is in progress under Article 3.27, 11. We request that procedures for payment of duties, amounts and the type of “security” needed pending completion of the verification should be explicitly defined by the Party requesting origin verification.
- e. The requirement for the importer to have in their possession a certificate of origin at the time of preference under Article 3.24, 1 (b). This requirement should give Customs authorities an efficient tool in verifying origin. The Parties should emphasize this document requirement to the business community when implementing “outreach” instructions and presentations.

However, our committee has serious concerns about the TPP rules of origin, as follows:

- a. The allowance of authentication of a certification of origin, such as “stamps”, as a condition of acceptance under Annex 1 point 8 is of concern because these add unnecessary costs and time, and are especially burdensome for SMEs.
- b. The specific rules of origin for many products under Annex 3-D are highly complex and will substantially add to the costs of compliance to SMEs. In some cases, they are very different in format than found in other US FTAs. SMEs may find it difficult to understand how to determine origin, then forego using the TPP. ITAC 11 requests that the implementing outreach programs by each Party establish specific points of contact for SMEs to obtain assistance to understand and comply with the Rules of Origin.
- c. The inclusion of the new Focused Value Method under Article 3.5 1. a) will be detrimental to SMEs who are traditional suppliers to major importers and exporters in need of originating materials to increase domestic content to be qualify their Regional Value Content (RVC). The inclusion of this RVC method, which allows extensive use of non-originating materials in the valuation of goods, will embolden major entities to include non-originating parts and still qualify goods as originating under this RVC method.
- d. The provisions under Article 3.8, 1. and 2. Requiring full costing of non-originating materials are inconsistent and encourage the use of non-qualifying materials. We concur that the cost of originating materials should have the incidental costs of freight, insurance, packing, etc., added to the base cost of the material to determine the value of the originating material. However, as currently written, item 2 allows the deduction of freight, insurance, packing, duties, etc. from the

cost of non-originating materials. This provision encourages the use of acquiring non-originating materials with reduced impact on the RVC calculation.

- e. Qualifying production costs added to non-originating materials under Article 3.10, 3 may be problematic to verify. We request that during Implementation these costs be separately invoiced to be easily verifiable by the Customs authorities of the Parties.
- f. Claims for Preferential Origin under Article 3.20 Section 2 may inadvertently prevent US exporters from benefiting from TPP preferences. Point 2(d) appears to limit the ability to correct certificate of origin errors or return to the exporter or producer (such as a SME) to prove origin. This process should be clarified.
- g. Claims for preferential treatment at the time of entry under Article 3.20 and Article 3.24,1. c) without supporting certification of origin encourage misapplication of the Rules of Origin, transshipment of goods with little opportunity for discovery, and are detrimental to companies, particularly SMEs, who are engaged in business to produce and ship originating goods for their benefit and the benefit of their customers. ITAC 11 recommends that preferential treatment claims must be supported by a certification of origin at the time of entry or when the claim for preferential treatment is made.

Textiles & Apparel

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Textiles and Apparel supports the expansion of international trade opportunities afforded SMEs under the TPP while affording protections to businesses in the Parties to the TPP. Further, ITAC 11 supports the rules, requirements and verification procedures set forth in this chapter. Given the complexity of these specific rules, ITAC 11 recommends that the importer provide a certification of origin for textile and apparel products to the importing party at the time of entry. Importers of all sizes, especially SMEs, will find collection of origin data after importation to be difficult to obtain within the verification time lines of this chapter.

ITAC 11 believes the De Minimis rules under Article 4.2 are reasonable and enforceable for all types of business entities. In addition, although the specific rules of origin for Textile and Apparel Products under Annex 4-A are complex, the rules are transparent and can be used to determine the qualifying status of their products.

Customs Administration and Trade Facilitation

ITAC 11 agrees in general with the text as negotiated. We believe the chapter on Customs Administration and Trade Facilitation will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, it applauds the following provisions which will benefit SMEs in the expansion of international trade opportunities: Express Shipments to be released through Customs within six hours; transparent procedures in the clearance of merchandise; advance rulings issuance on matters of classification; automation and electronic submission of entry data at a single point of entry; protest by the importer in the event of a dispute over the amount of duties, taxes and fees owed; and authorization of the release of goods within 48 hours of arrival, without/prior to a final determination of duties. We offer the following additional comments.

- a. The valuation and qualification of originating goods within 150 days of request is not sufficiently timely, especially in the case of perishable items.
- b. Customs Authorities in the Parties to the TPP may inconsistently apply classification and valuation of goods. ITAC 11 requests that classification and valuation training for Customs officers are required, and a central source for classification guidelines be available.

- c. ITAC 11 requests that a list of which Parties will not provide Advanced Rulings under Point 1 (a) through (d) be made available online. In addition, under Point 8, ITAC 11 requests that a search method for Advanced Rulings for those *other than the requester*, similar to the U.S. Customs and Border Protection's CROSS rulings database, be made available online in all Parties to the agreement.

Trade Remedies - No position

Sanitary & Phytosanitary

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Sanitary and Phytosanitary Measures will enhance international trade opportunities while affording protections to SMEs in the Parties to the TPP. Further it applauds the inclusion of transparency through the WTO SPS notification system and risk analysis based on scientific principles. However, it is concerned that the allowance of levels of protection "determined appropriate" without further definition may result in unintended trade barriers.

Technical Barriers to Trade

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Technical Barriers to Trade will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, we applaud the inclusion of measures to provide transparency and enhance public input; non-allowance of consular transactions for conformity assessment bodies; and accordance to conformity assessment bodies of other territories no less favorable than its own. ITAC 11 recommends that regular communication with and access to the Committee on Technical Barriers to Trade be afforded SMEs through a defined communication point.

Investment - No position

Cross Border Trade in Services - No position

Financial Services

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Investment will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP.

ITAC 11 is pleased that the Agreement's liberalization of financial services contemplates "equal access" to the Parties' markets for financial services providers ("national treatment"). However, the treaty appears not to mandate that financial institutions of one Party be granted access to the trade and project-related government loan guarantee and insurance programs of another party. Historical practice in the U.S. has been to extend loan guarantee access to qualifying non-U.S. financial institutions in cases where loans are being made for their indigenous businesses to purchase U.S.-made products, or are otherwise financing a U.S. export transaction. While Parties to the agreement may consider this on a case-by-case basis, it is not explicitly defined. ITAC 11 recommends that during Implementation the Agreement explicitly define the concept of mutual access to government loan guarantee and insurance programs for international trade for the purpose of financing purchases and sales between the Parties.

In addition, ITAC 11 is concerned that the definition of “financial institution” is too narrow. While the definition of “authorized to do business *and* regulated or supervised” is justifiable due to the Parties’ efforts to prevent money laundering, terrorist financial flows, etc., it should be noted that many of the U.S. government commercial loan guarantee agencies allow participation in their programs by fully-vetted and compliant non-regulated financial institutions, subject to tightly written agreements detailing roles and responsibilities. ITAC 11 recommends that during Implementation the definition of “financial institution” be incorporated to include “financial intermediaries (of all types) authorized by government-owned development finance institutions and/or export credit agencies to make government-guaranteed or government-insured loans”.

Temporary Entry for Business Persons

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Temporary Entry for Business Persons will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, it applauds that information is to be made available online as to the process, current requirements, time frames and fees to obtain a visa, as well as the commitment of the Parties to enhance the mobility of business persons and enhancement of the APEC Business Travel Card program. ITAC 11 recommends the Committee on Temporary Entry for Business Persons address the impediment imposed by the requirement of some countries to appear in person at consulates or embassies to obtain a travel visa.

Telecommunications - No position

Electronic Commerce

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Electronic Commerce will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, ITAC 11 applauds cooperation to assist SMEs to overcome obstacles in use of electronic commerce; encouragement of electronic authentication and signatures; provisions for online consumer protection, personal information protection, paperless trading, prevention of unsolicited electronic messages, and cyber security cooperation; inclusion that no party can force a business to use or locate computer facilities within its territory and the consumer’s choice regarding internet access; and the disallowance of requiring source code as a condition of doing business in a territory.

However, it is concerned that inclusion of the language “nothing in this Article shall prevent a Party from adopting or maintaining measures ... to achieve a legitimate public policy objective” under Article 14.11: Cross-Border Transfer of Information by Electronic Means and Article 14.13: Location of Computing Facilities may open a loophole for Parties in the TPP to prevent SMEs from certain activities in the “name of public interest”. ITAC 11 requests that the Commission closely monitor these provisions. In addition, it requests that during Implementation, a central access for SMEs to ask questions and obtain assistance be made available; a list of allowable chargeable internal taxes and fees; and trade administration documents be made available to the public and online.

Government Procurement

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Government Procurement and Annex will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, ITAC 11 applauds the inclusion of specific efforts to facilitate the participation of SMEs including transparency of criteria eligibility, a single

portal for procurement information and cooperation with SMEs in the work of the Committee on Government Procurement.

However, ITAC 11 is concerned that SMEs may be precluded from participation in government procurement due to the generally accepted requirement that a business must have a singular corporate or tax ID issued by the national-level government. In addition, offsets in government procurement contracts, not allowed in the TPP, often benefit SMEs. ITAC 11 requests that the process to obtain qualification for government procurement (including singular corporate or tax IDs) particular to the Parties in the TPP be made publicly available online, and the Committee on Government Procurement consider additional measures be adopted to assist SMEs for sub central procurement and enforcement of ‘non-adoption’ of technical specifications.

Finally, ITAC 11 requests that the list of “developing country Parties” referenced under Article 15.5 be made available online.

Competition - No position

State Owned Enterprises

While ITAC 11 respects the intent of this chapter, it reserves judgment, as its members did not complete a full assessment within the time allotted.

Intellectual Property

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Intellectual Property will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, ITAC 11 applauds the inclusion of measures for the Committee to enhance participation of SMEs. ITAC 11 recommends the Parties to the agreement recognize the importance of Intellectual Property Rights education, and develop and execute a plan for outreach to the general public as well as the business community. Since IPR is complicated and many SMEs do not have the background to understand what constitutes an infringement, a focus on educating SMEs is imperative.

Labour

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Labour will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. We appreciate that all Parties to the TPP should address, through statutes and regulations, acceptable labor conditions, and request that the Labour Council diligently assess the impact of same on SMEs in all Parties to the Agreement.

Environment

ITAC 11 is in marginal agreement with the text as negotiated. While we are pleased that enhanced environmental technology standards in all TPP Parties enhances international trade opportunities for SMEs, we are concerned that the provisions in this Chapter may also create trade barriers, resulting in a net zero effect. Specific concerns are offered below.

- a. The provisions in this Chapter calling for “low emissions technologies”, low emissions monitoring, and the transition to new technologies in general may be cost-prohibitive for small and medium-sized enterprises.

- b. While the transitions to new technologies should reflect domestic circumstances and capabilities, this may put U.S. small and medium-sized companies at a distinct disadvantage compared to like entities in other Parties to the TPP with less-developed environmental regulations. Compliance with regulations and adoption of new technologies specified in environmental regulations in developed countries compared with the cost of same in less developed countries creates an un-level playing field. This is particularly challenging for high-energy users such as manufacturers. In addition, SMEs that constitute the bulk of U.S. supply chains may be adversely affected as costs and responsibilities are “pushed down” supply chains.

Cooperation and Capacity Building

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on the Cooperation and Capacity Building will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. ITAC 11 encourages governments of the Parties to collaborate with the private sector including existing non-government trade facilitation organizations to provide education, training, and technical assistance.

Competitiveness and Business Facilitation

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Competitiveness and Business Facilitation will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, ITAC 11 applauds the inclusion of measures for the Committee on Competitiveness and Business Facilitation to provide recommendations to enhance participation of SMEs in regional supply chains. ITAC 11 recommends activities that facilitate participation in supply chains include support for SME participation in trade shows and trade missions and be made publicly available online.

Development

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Development will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. ITAC 11 recommends that the Committee on Development assess the level of SME inclusion in development contracts and that issues for improvement be addressed as needed during Implementation.

Small & Medium Enterprises

ITAC 11 is in general agreement with the text as negotiated, and applauds the inclusion of this Chapter, references to SMEs in other chapters throughout the TPP, the establishment of a Committee on SMEs, and a dedicated web portal for SMEs. We believe the Chapter on Small & Medium Enterprises will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. We offer the following additional comments.

- a. Inclusion of all information integral to trade in the Parties to the Agreement should be made available online and in English.
- b. Strengthening input mechanisms from SMEs to the Committee on SMEs for timely and regular communication in multiple formats including seminars and workshops, dialogue, online input and participation at the Committee on SMEs meetings is essential for SMEs to benefit from the Agreement. In addition, the Committee on SMEs’ dialog should immediately include the decision to expand the U.S.’s online Tariff Tool to include TPP, practical programs and practices, the establishment of a dedicated website to assist SMEs to understand and benefit from the Agreement, as well as the possibility of creation of an online electronic commerce site for SMEs.

- c. ITAC 11 recommends that each Party should include on its SME website the ability to receive requests and provide responses to inquiries in real time. Complex inquiries could be completed within 30 days but routine questions on valuation, classification, technical standards or trade facilitation could be completed in one to three days of receipt because the government officials of each Party have access to internal resources to timely respond to SMEs. This expedited inquiry-response mechanism will minimize SME's cost of trade compliance and afford SMEs the needed information to make critical business decisions on TPP business opportunities.

Regulatory Coherence

ITAC 11 is concerned with the text as negotiated. While ITAC 11 supports the expansion of international trade opportunities afforded SMEs under the TPP, we believe the Chapter on Regulatory Coherence will not necessarily enhance, and may in effect continue to hinder, SMEs from capturing these opportunities.

ITAC 11 is concerned by the ambiguous text regarding the Scope of Covered Regulatory Measures under Article 25.3. In practice, the ambiguity of the language may well result in a continued lack of regulatory coherence -- an impediment to all businesses. Lack of regulatory coherence is a significant challenge to SMEs which lack the resources to access, understand and comply with multiple sets of regulations even though compliant in their "home" market. ITAC 11 recommends a matrix of the scope of covered regulatory measures per Party be made available to the public and online.

ITAC 11 is also concerned with the Committee on Regulatory Coherence's (CRC) assessment of progress of the Chapter, ambiguity of the CRC's meeting schedule, 'possible' consideration of the regulatory impact on SMEs, and the extended timeframe allowed in Notification of Implementation. ITAC 11 requests the CRC deliberately assess the regulatory impact on SMEs.

Transparency & Anti-Corruption

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Transparency & Anti-Corruption will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. Further, ITAC 11 applauds measures to enhance transparency via information made publicly available online and which discourage corruption.

Administration & Institutional Provisions

ITAC 11 is in general agreement with the text as negotiated. We believe the Chapter on Administration & Institutional Provisions will enhance SME international trade opportunities while affording protections to businesses in the Parties to the TPP. We strongly encourage the Commission to regularly obtain input from non-governmental organizations and the private sector in general to intensify input from SMEs.

Dispute Settlement - No position

Exceptions

ITAC 11 is disappointed that the United States has agreed to a product-specific exemption pertaining to public health measures in the Investment Chapter related to Article 29.5: Tobacco Control Measures. We are concerned this could set a precedent by which other sectors may be excluded from certain protections in future trade agreements, leaving SMEs at a disadvantage.

Final Provisions - No position

VI. Membership of Committee

Ms. Karyn L. Page
Ms. Kimberly A. Benson
Mr. John Allen
Mr. Harry M. Bossey, CPA
Ms. Teresa D. Cox
Mr. Roger N. Dickey, CPA
Mr. Richard J. Grana
Mr. Laszlo Horvath
Mr. Frank F. Islam
Ms. Shawn M. Jarosz
Mr. George M. Keller
Mr. Elliot M. Levin, CPA
Mr. Lee A. Oppenheim
Ms. Regina (Gina) Radke
Mr. J. Eric Sauereisen
Ms. Holly S. Wade
Mr. Richard L. Wilkey
Mr. Robert R. Wilson

Mr. Brooke Fishback, MBA
Mr. Clifton W. Albright, Esq
Mr. Frederick L. Baehner
Ms. Candace Chen
Mr. Steven J. Craig
Ms. Sharon T. Freeman, Ph.D.
Mr. Matt Grayson
Mr. David A. Ickert
Mr. Jorge Izquierdo
Mr. Johnny Johnson
Mr. Peter O. Lehman, Esq.
Ms. Monika Mantilla
Mr. Christopher M. Quinn
Mr. Jeffrey W. Ruffner, P.E.
Mr. Brett N. Silvers
Mr. John T. Wilkerson
Mr. Donald L. Williams
Mr. Mark W. Wingate