6. EXISTING TRANSPORTATION SYSTEM AND CONDITIONS

This section describes Oklahoma's multimodal transportation infrastructure inventory based on system data and attributes for the year 2013 for highways, bridges, freight rail, ports and waterways, public transportation, passenger rail, and airports.

Understanding that a world class transportation system is the cornerstone of a vibrant economy and a leading factor in growing and attracting business and industry, the Oklahoma legislature decided that strengthening the investment for transportation infrastructure should be a priority of state government. As described in Chapter 1, in 2005 the Legislature and Governor reversed the previous 20 years of flat funding by passing and signing legislation to fund bridge and roadway improvements. These initiatives introduced new state funding resources reserved solely for constructing, preserving, and maintaining state highways and bridges.

6.1. HIGHWAYS

Oklahoma has an extensive highway network, which provides connections between the east and west coasts of the U.S., and which links northbound movements from Texas to the central U.S.

Oklahoma has approximately 112,800 miles of public roads, a number that has remained relatively constant over the last decade. ODOT is responsible for the 12,265 mile State Highway System, which is mostly rural in nature with urban highways and expressways in the major metropolitan areas. The State Highway System includes nearly 3,400 miles of the NHS,[1] which consists of roadways deemed important to the nation's economy, defense, and mobility.

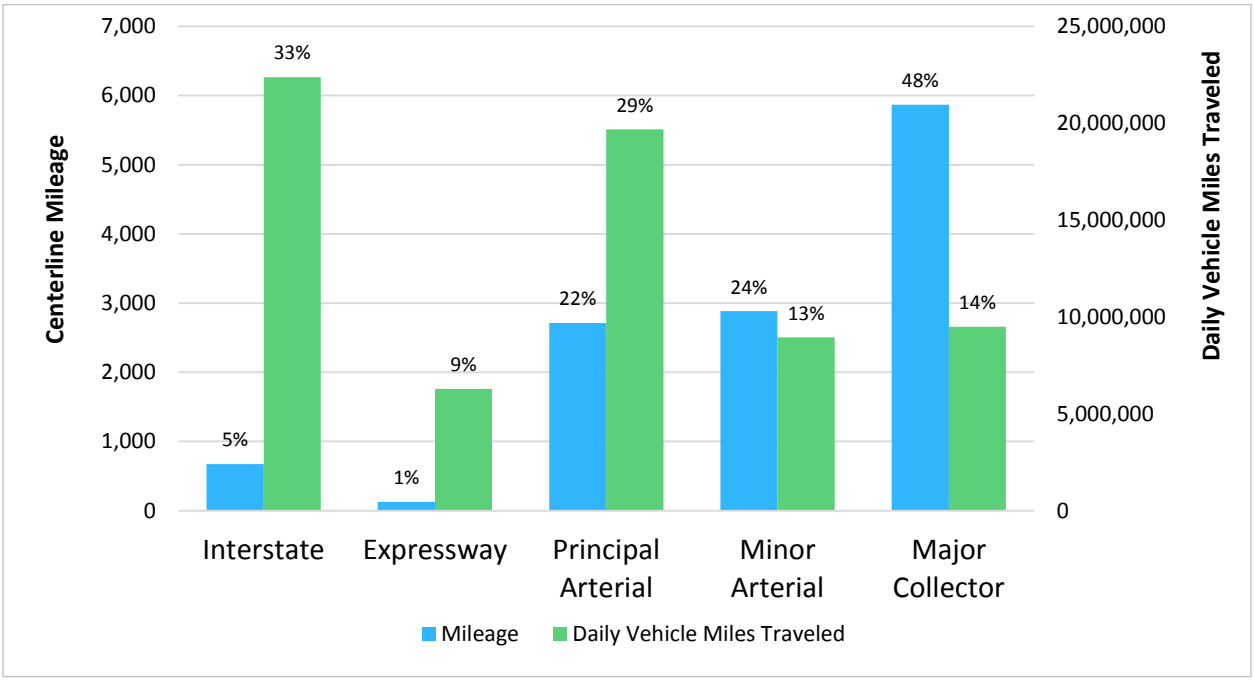
Major interstates in Oklahoma include I-35, I-40, and I-44, for a total of 673 miles.[2] As both a portion of and a complement to the interstate system, Oklahoma has 10 turnpikes totaling 606 miles. These toll roads are maintained by the Oklahoma Turnpike Authority and approximately 40 percent of the toll revenues are collected from out-of-state motorists.

A breakdown of the State Highway System in **Figure 6-1** displays the road miles and daily vehicle miles traveled (VMT).

6.1.1. Rural Two Lane Highways

Oklahoma rural highways have a rich history of serving the state's energy and agricultural based economy, and many of these highways have been converted from farm to market roads over time. While these rural roads were intended for transporting livestock and crops to market 70 years ago, today these roads are unable to accommodate the quantity and weight of increased legally loaded trucks, increased traffic demands, and higher speed limits. Of the over 9,500 miles of rural two-lane highways on the State Highway System, approximately 4,600 miles of these are two-lane facilities without paved shoulders.

Figure 6-1. State Highway System Mileage and VMT by Functional Class



Source: U.S. DOT, Federal Highway Administration, 2013 Summary of Highway Statistics

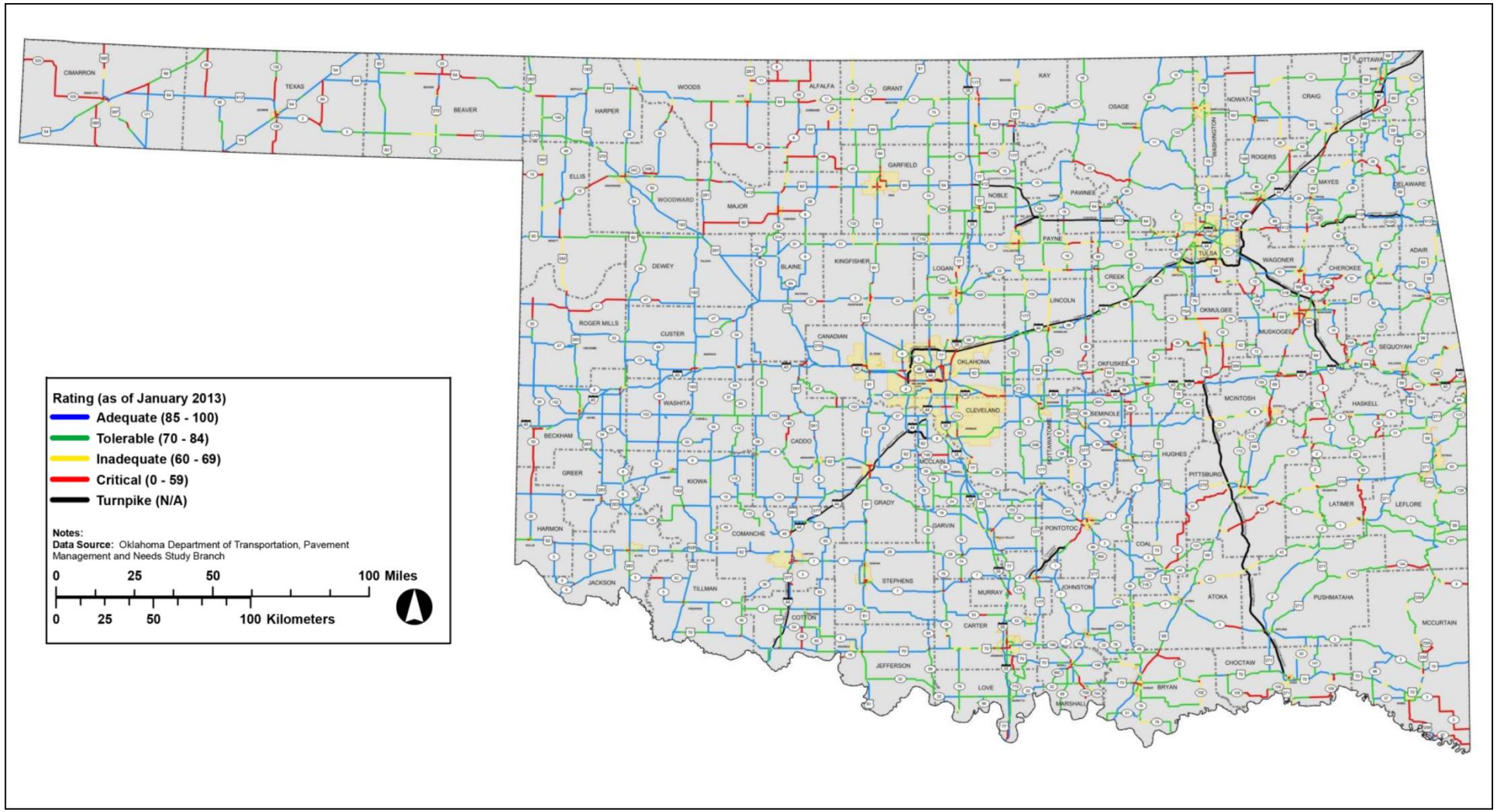
Figure 6-2 illustrates that pavement deterioration is a statewide issue on all types of highways. The pavement surfaces require systematic preservation treatments to maximize useful highway design life. With past funding constraints, it has been impossible for ODOT to consider such systematic preservation approaches and programs to extend the pavement design life.

As of January 2013, 3,862 miles (31 percent) of the State Highway System are rated as critical or inadequate,[3] this includes 3,364 miles of two-lane highways. Over 3,680 miles of inadequate highway will remain unaddressed with the scheduled improvements identified in the 2015-2022 Eight Year CWP.

6.1.2. Major State Highways

Traffic on the major state highways has increased dramatically over the past 20 years with the exception of the recession years of 2008 and 2009. Freight traffic has experienced this same dramatic growth and is expected to continue to grow for the foreseeable future. The daily vehicle miles travelled on highways with four-lanes or more (includes both major state highways and interstates) was over 48 million miles in 2013. This represents over 73 percent of the total vehicle miles travelled every day on the State Highway System.

Figure 6-2. Pavement Surface Condition Ratings



Source: Oklahoma Department of Transportation, Pavement Management & Needs Study Branch.

6.1.3. Interstate Highways

The Interstate Highway System is the highest class of highway and is designed to be the national defense and national commerce system that moves large volumes of people and goods across the U.S. While Oklahoma's 673 miles of interstate highways account for only 5 percent of the centerline miles of the State Highway System, they carry 33 percent of the daily vehicle miles travelled.

The conditions of the highway system are continuously assessed in order to program appropriate reconstruction, rehabilitation, and maintenance improvements in a fully integrated and systematic manner; and regular maintenance extends the design life of the facilities. The combination of these integrated programs is the lifeblood of the continuous operation of the State Highway System. Approximately 300 of the 673 miles of interstate pavement have experienced significant rehabilitation or reconstruction since 2003, and 178 miles are scheduled for improvement in the current CWP.

6.1.4. Congestion Analysis

During the development of the 2015-2040 LRTP, ODOT conducted a pilot study that explored the use of travel time data as a tool to measure and manage congestion.[4] This pilot study analyzed National Performance Measure Research Data Set (NPMRDS) vehicle probe data (travel time data along NHS) provided by FHWA[5] for the time period of July 2013 to May 2014. Two corridors, I-40 and US-69, were elected by ODOT for analysis to gain increased insight about congestion as it affects freight and commuter travel on the State Highway System and develop congestion measures.

The study reviewed and summarized some of the federal, state, and local agency practices in the areas of data collection and congestion measurement for the operational effectiveness of highway segments and systems as they pertain to highway congestion. Utilizing this research and maintaining consistency with the performance measures framework identified for 2015-2040 LRTP, this study recommended travel time-based congestion measures. The NPMRDS data along with volume data from ODOT's Traffic Characteristics Report were utilized to calculate the five recommended congestion measures for I-40 and US-69. The study developed these measures for passenger only traffic, freight traffic and all traffic. The results showed that US-69 in northeast Oklahoma experiences medium to high congestion during the day time, which can be attributed to passenger and freight traffic.

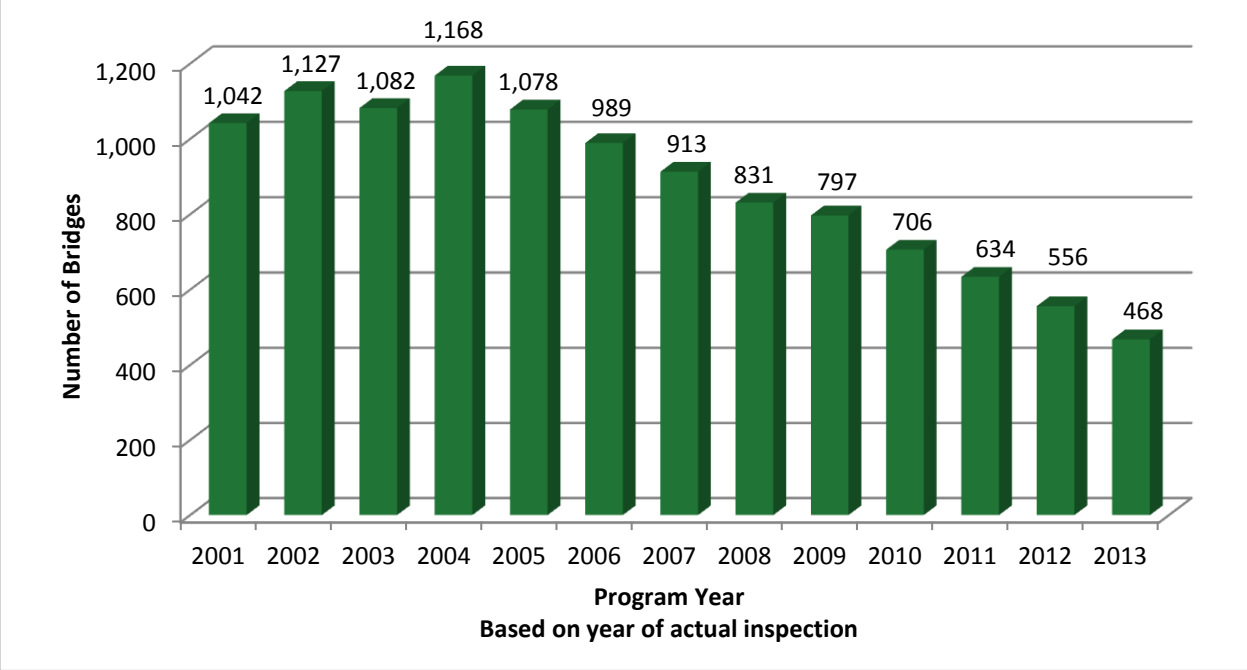
Additionally, I-40 within Oklahoma City limits experiences medium congestion during day time, which can be attributed to passenger only traffic. The study also analyzed the impact of different thresholds for identifying congestion. Two threshold speeds were used to identify congestion and it was observed that with a lower threshold speed, more roadways segments would be classified as congested. Understanding this impact will be very useful to ODOT in determining a threshold for the congestion measures.

This study proposed an innovative methodology to use the latest vehicle probe data to develop an understanding of congestion along Oklahoma's roadways. This methodology can be used to understand and address roadway congestion using the latest vehicle probe data. (ODOT may apply this or similar methodologies to address anticipated MAP-21 regulations on travel time performance measures.) This methodology used routinely over time allows the identification of new congested roadway segments and monitoring of existing ones to discern congestion trends. This methodology is also helpful to develop meaningful criteria and communicate complex ideas related to congestion and reliability.

6.2. BRIDGES

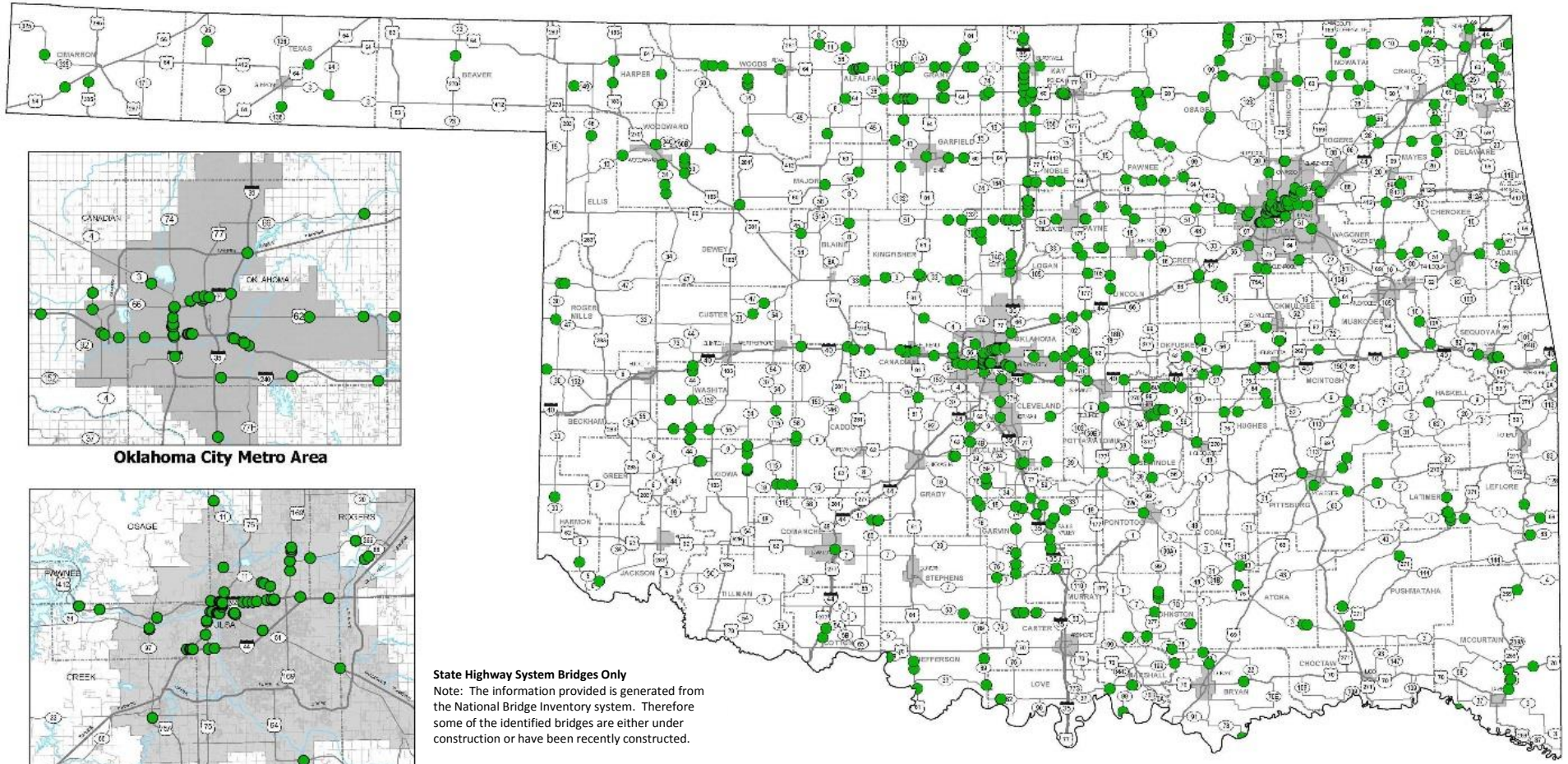
After decades with little investment in the state's 6,828 bridges, increased state funding enabled ODOT to replace or rehabilitate 823 bridges between 2006 and 2013. Since the year 2000, when Oklahoma was ranked as one of the worst states on the national list of structurally deficient bridges[6], ODOT's priority has been a focus on eliminating structurally deficient bridges. In 2004, Oklahoma peaked with 1,168 bridges (17 percent) on the State Highway System that were classified as structurally deficient. **Figure 6-3** and **Figure 6-4** illustrate that the bridge problem is truly a statewide issue and not specific to any region or locale within the state**.** **Figure 6-4** also illustrates ODOT's success with the dedicated bridge funding and strategic focus on state maintained bridges. The number of structurally deficient bridges on the State Highway System has shown a steady decline from 1,168 in 2004 to 468 in 2012.

Figure 6-3. Oklahoma's Structurally Deficient Bridges, 2001-2013 on Interstate, U.S., and State Highways



Source: Oklahoma Department of Transportation, Bridge Division.

Figure 6-4. Structurally Deficient Bridges



Source: Oklahoma Department of Transportation, Bridge Division.

6.3. HIGHWAY SAFETY

The safety of the traveling public is of paramount importance to ODOT. Oklahoma's first Strategic Highway Safety Plan (SHSP) was completed in 2007 and it outlined five focus areas: unsafe driving behavior, intersection crashes, young drivers, lane departure crashes, and crosscutting strategies. Unsafe driving behavior includes impaired drivers, aggressive drivers, speeding drivers, fatigued drivers, distracted drivers, and drivers not using seatbelts.

The SHSP strategies include: reducing overall fatalities and injuries, improving crash data and its availability, and developing a safer overall vehicle fleet. These safety strategies were developed based on an analysis of several data sources and highway inventories. When undesirable highway safety patterns are evident, ODOT works to identify and evaluate potential counter measures.

State highways without paved shoulders are a significant safety concern to ODOT and the traveling public. Of the over 9,500 miles of rural two-lane highways on the State Highway System, approximately 4,600 miles of these are two-lane facilities without paved shoulders. ODOT has 583 miles of roadway scheduled for shoulder improvements in the 2015-2022 Eight Year Construction Work Plan.

Oklahoma, like many other states, has experienced a significant increase in motorcycle fatalities. Motorcycle fatalities have increased from 75 in 2006, to an average of 98 per year between 2008 and 2012.

Additional information about Safety and Security issues are discussed in **Chapter 8**.

6.4. FREIGHT ON THE HIGHWAY SYSTEM

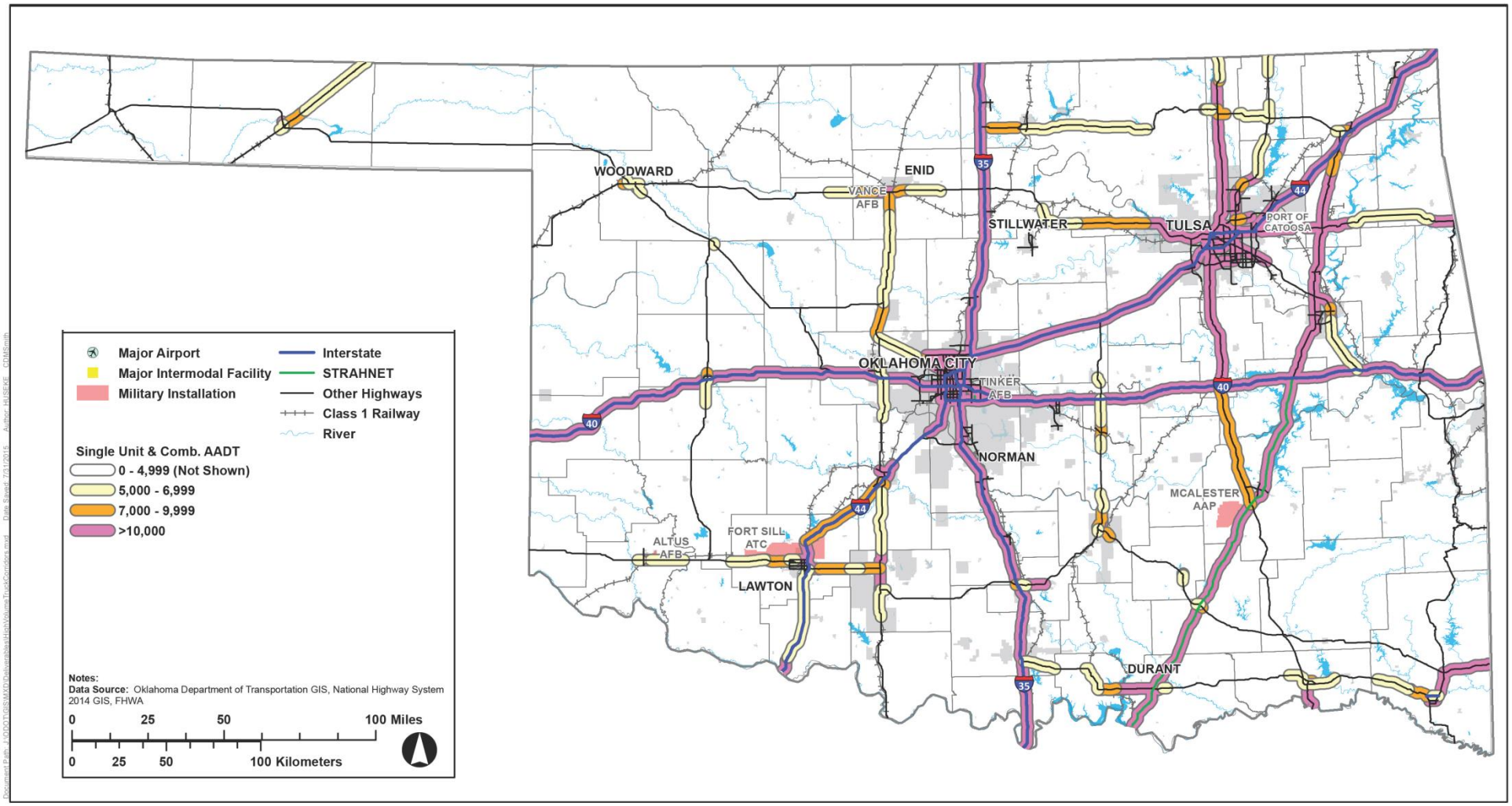
As ODOT looks to the future, a major focal point is to assess and project freight growth and its impacts. **Chapter 7** highlights the current and future freight movements in Oklahoma. Major Oklahoma trucking corridors are highways with 5,000 or more trucks daily, or where a highway's average daily traffic consists of more than 40 percent trucks. While I-40 in central Oklahoma carries the highest daily truck volumes, there are other truck corridors that carry a significant level of truck traffic. Other highways that carry high levels of truck traffic include US-69 in southeast Oklahoma, I-35 south of Oklahoma City to the Texas state line, and US-287 in the Oklahoma panhandle, all of which carry over 50 percent trucks daily. **Figure 6-5** illustrates the daily traffic and the truck traffic associated with the freight corridors.

Analyzing truck volumes allows ODOT to identify the most important statewide freight corridors. **Table 6-1** shows truck traffic on selected segments of the National Highway System. Each highway serves as an important link for goods movement. Oklahoma City's position as a major freight generator and attractor is shown by the high volumes along I-40, I-35, and I-44. Coupled with this is US-69, providing a critical and more direct link from Dallas to the eastern and northern portions of the country beyond Oklahoma.

Illegally loaded or operated trucks have an adverse impact on the condition of the transportation system and the safety of the traveling public. Overweight trucks significantly reduce the intended design life of a highway, and result in extra costs to maintain the highways in a serviceable condition. To more comprehensively address these issues, the Port of Entry program was developed in 2008 in partnership between the Oklahoma Corporation Commission, Oklahoma Turnpike Authority, and ODOT. This partnership was an effort to upgrade Oklahoma's port of entry facilities and a goal was set to develop eight new Port of Entry facilities at strategic locations at the Oklahoma borders (**Figure 6-6**).

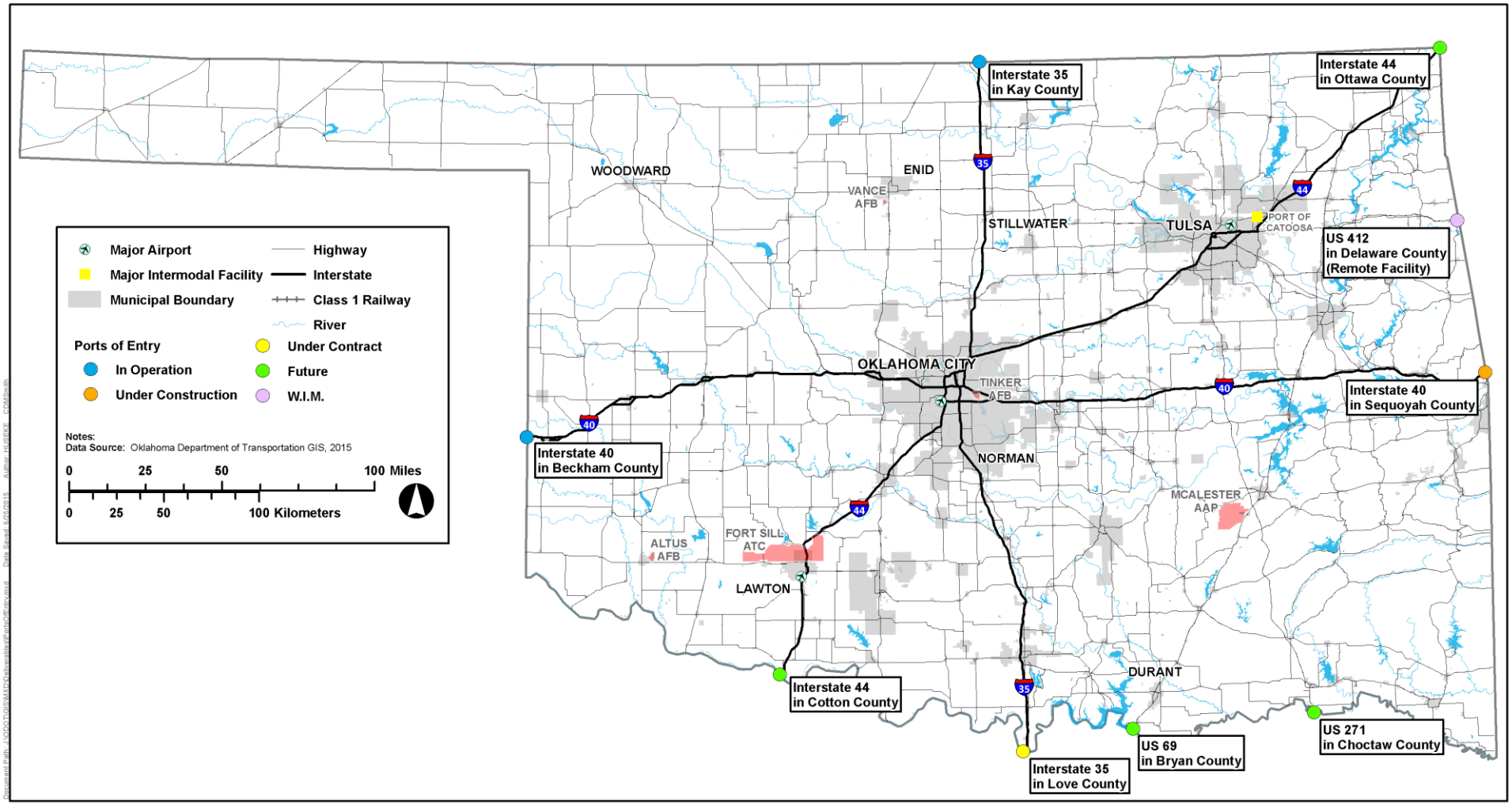
Ports of Entry are locations at the state border where commercial vehicles undergo electronic processing for a number of items, including but not limited to driver credentials, weight, tax and fee status, and safety inspections.

Figure 6-5. 2012 High Truck Volumes on NHS



Source: Oklahoma Department of Transportation, Engineering Services Branch.

Figure 6-6. Ports of Entry



Source: Oklahoma Department of Transportation, Strategic Asset & Performance Management Division.

Table 6-1. Highest Truck Volume Highways, Oklahoma, 2013

Roadway	County	Single Unit Truck Volume	Combination Truck Volume	Total Truck Volume	AADT
I-35	Oklahoma	5,830	9,400	15,230	123,100
I-40	Oklahoma	6,380	8,150	14,530	108,100
I-44	Rogers	3,880	8,030	11,910	67,600
US-69	Pittsburg	1,670	5,450	7,120	19,800
US-169	Tulsa	5,030	2,490	7,520	116,000
US-259	McCurtain	150	460	610	9,500
US-281	Canadian	740	1,240	1,980	7,100
US-287	Cimarron	300	1,310	1,610	3,200

Source: Oklahoma Department of Transportation, National Highway System, 2013.

Another integral part of Oklahoma's commitment to closely monitor the truck traffic on the highway system is the recent implementation of the Oklahoma Permitting and Routing Optimization System (Okie PROS) for oversize/overweight trucks. The new automated permitting system processed and approved 251,161 permits in 2011, its first full year of operation. Over half of these permits took less than 10 minutes to obtain. Prior to the new automated system, permits took an average of 24 hours to obtain.

The current statewide focus on improving structurally deficient bridge infrastructure also has a targeted effect on both legal and permitted loads. The focus on these bridges ensures that these structures are in a condition to support the safe and efficient travel of a growing economy without unnecessary delays or detours.

Additional information about Freight Transportation is discussed in **Chapter 7**.

6.5. FREIGHT RAIL

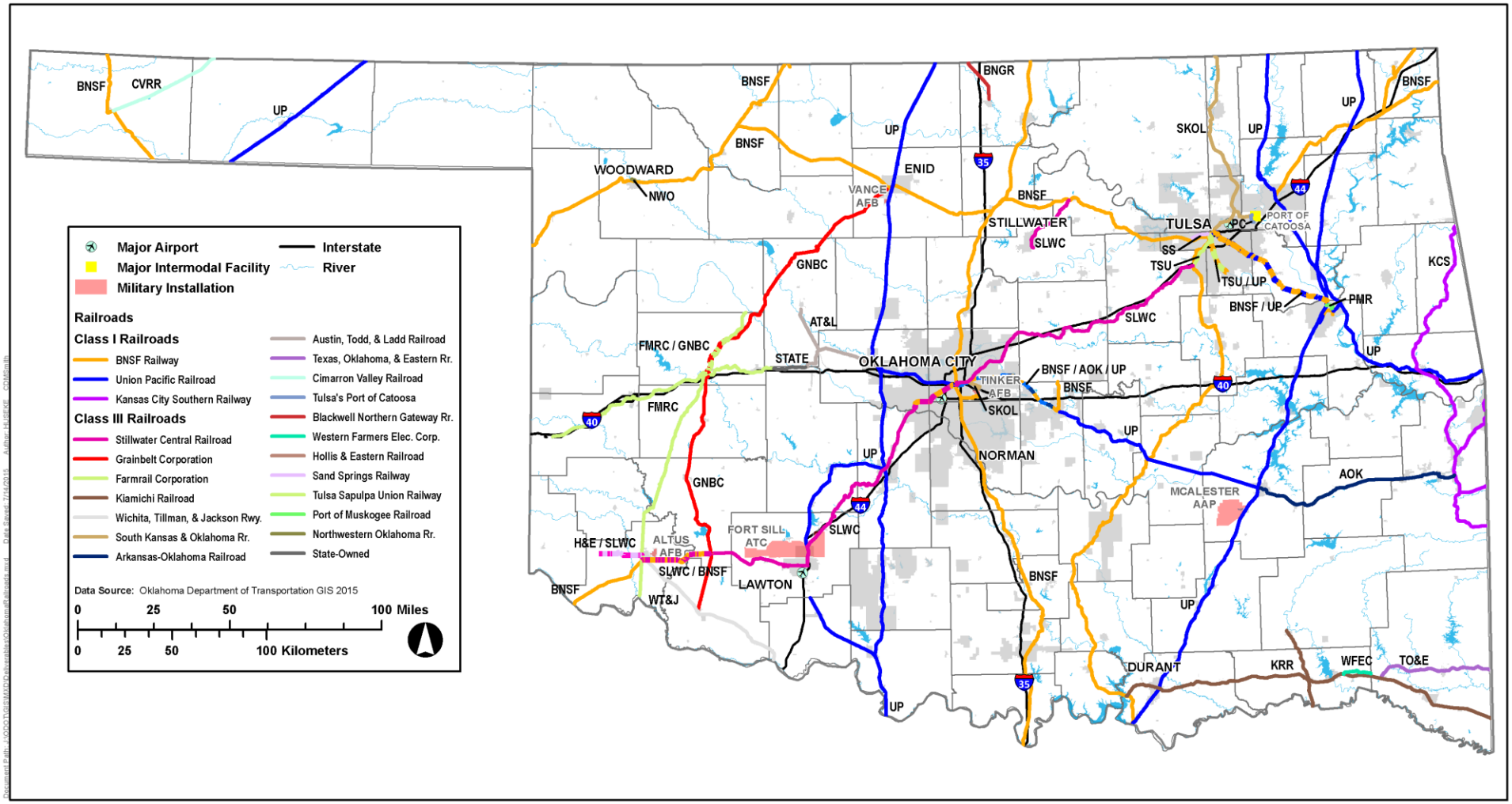
The railroad system plays an important part in Oklahoma's freight network. A single train replaces several hundred trucks on the roadways and thus alleviates congestion and deterioration throughout the state. Based on data from the Association of American Railroads (AAR), cargo volumes handled by train in 2011 would have required an additional 17.1 million trucks had they moved by roadways.

Currently, three Class I railroads operate in Oklahoma, which include Burlington Northern Santa Fe (BNSF), Union Pacific (UP), and Kansas City Southern Railway (KCS). Oklahoma also has 19 Class III or short line railroads that provide regional service and connections to the Class I railroads. Approximately 68 percent of the state's rail lines are operated by Class I railroads, and the remaining by short line railroads. The Class I and Class III railroad mileage is provided in **Table 6-2**.

Oklahoma is one of the few states in the country that owns rail lines. In the past, ODOT purchased abandoned or soon to be abandoned rail lines with the intent of preserving the connected rail network for the future benefit of Oklahoma. At its peak, the State of Oklahoma held title to 882 miles of rail line. Most of these miles of state owned rail have been returned to private ownership; and as of midyear 2015, ODOT owns 213 operating miles of rail line, 70 miles of which are under a lease purchase option that will mature in 2016 (**Figure 6-7**).

In addition to being a safety factor, at-grade crossings also contribute to congestion and traffic issues. The trend of railroads utilizing longer "unit trains" places pressure on facilities/communities they serve, such as increasing congestion at railroad crossings.

Figure 6-7. Oklahoma State Railroad Map



Source: Oklahoma Department of Transportation, Rail Programs Division.

Table 6-2. Railroad Lines

Railroad	Acronym	STB Classification	Total Mileage	State-owned Mileage
BNSF Railway	BNSF	I	1,475	
Kansas City Southern Railway	KCS	I	139	
Union Pacific Railroad	UP	I	921	
AOK Railroad Company	AOK	III	69.9	69.9
Austin Todd & Ladd Railroad	AT&L	III	46	9.0
Blackwell Northern Gateway Railroad	BNG	III	17	17.0
Cimarron Valley Railroad	CVR	III	35	
Farmrail Corporation	FMRC	III	179	89.9
Grainbelt Corporation	GNBC	III	186	
Hollis and Eastern	H&E	III	14	
Kiamichi Railroad	KRR	III	157	
Northwestern Oklahoma	NOW	III	7	
Port of Catoosa	PC	III	20	
Port of Muskogee	PMR	III	9	
Public Service of Oklahoma	PSO	III	11	
Sand Springs Railway	SS	III	10	
South Kansas & Oklahoma Railroad	SK&O	III	79	5.0
Stillwater Central Railroad	SLWC	III	240	22.0
Texas, Oklahoma & Eastern Railroad	TO&E	III	40	
Tulsa Sapulpa Union Railway	TS	III	10	
WFEC Railroad Company	WFEC	III	14	
Wichita, Tillman & Jackson Railway	WT&J	III	61	
		Total Miles	**3,740**	**212.8**

Source: Oklahoma State Department of Transportation.

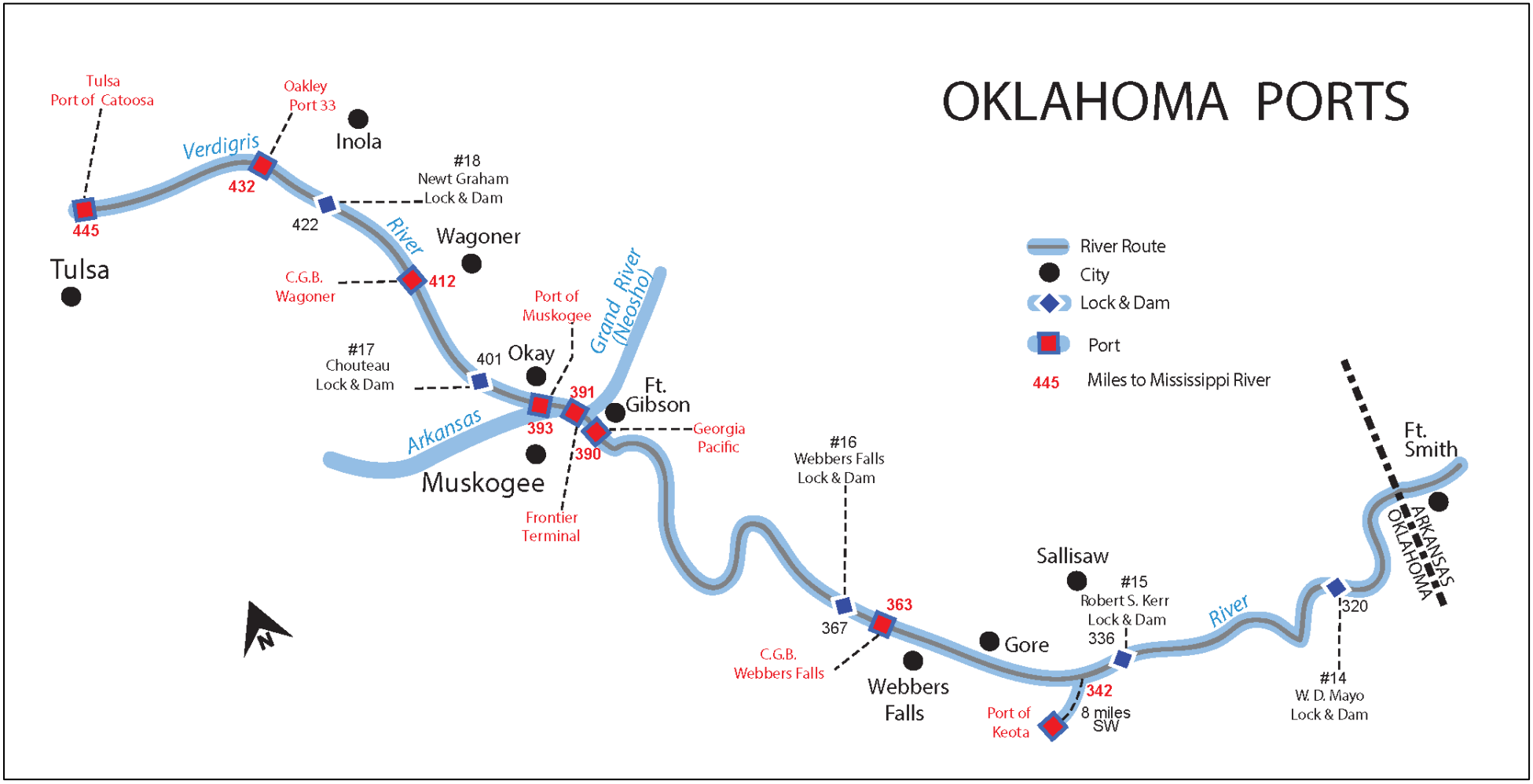
ODOT's rail program monitors FHWA's grade crossing safety program for the 3,800 at-grade rail/highway crossings, manages the state owned rail property and track, and oversees coordination with railroad companies.

6.6. PORTS AND WATERWAYS

The McClellan-Kerr Arkansas River Navigation System (MKARNS) is Oklahoma's primary navigable waterway originating from the Tulsa Port of Catoosa and flowing southeast through Arkansas to the Mississippi River. The waterway contains five dams in Oklahoma that provide numerous benefits, such as preventing flood damage, hydropower generation, recreation, fish and wildlife conservation and most importantly navigation. Transporting products by barge is the most economical, safe and environmentally friendly way of shipping bulk and oversize cargo with low time sensitivity.[7]

The Ports of Muskogee and Catoosa are the state's two public ports, and both are designated as Foreign Trade Zones.[8] In addition, there are several other private port operations along the MKARNS as shown in **Figure 6-8**. Oakley's Port 33 (formerly Johnston's Port) is a large privately owned port facility located south of the Port of Catoosa adjacent to US-412 near Inola. There are 31 terminal facilities along the MKARNS waterway and most facilities are located near the Ports of Catoosa and Muskogee. Both public ports provide rail access in and out of its industrial parks. Local industries manufacture bulk commodities in the industrial parks and this provides direct access to global markets.

Figure 6-8. Oklahoma Portion of the McClellan-Kerr Arkansas River Navigation System, 2015



Source: Oklahoma Department of Transportation, Waterways Program.

MKARNS is managed by the United States Army Corps of Engineers (USACE). USACE is responsible for the operation and the maintenance of the system and defines "critical maintenance" as projects needed to avoid a likely system failure (defined as a greater than 50 percent probability) within the next five years. The available federal funding has not kept pace with the demand over the years, and wear and tear continues on the locks that are now over 40 years old.

ODOT is committed to providing safe and efficient access to the ports. Since 2000, ODOT has awarded 226 contracts in excess of $644 million within a 10 mile radius of the Port of Catoosa, Port of Muskogee, and Oakley's Port 33. Looking forward, over the next seven years, ODOT has 96 projects totalling $150 million within a 10 mile radius of these ports.

6.7. PUBLIC TRANSPORTATION AND PASSENGER RAIL

6.7.1. Rural, Urban, and Tribal Public Transportation

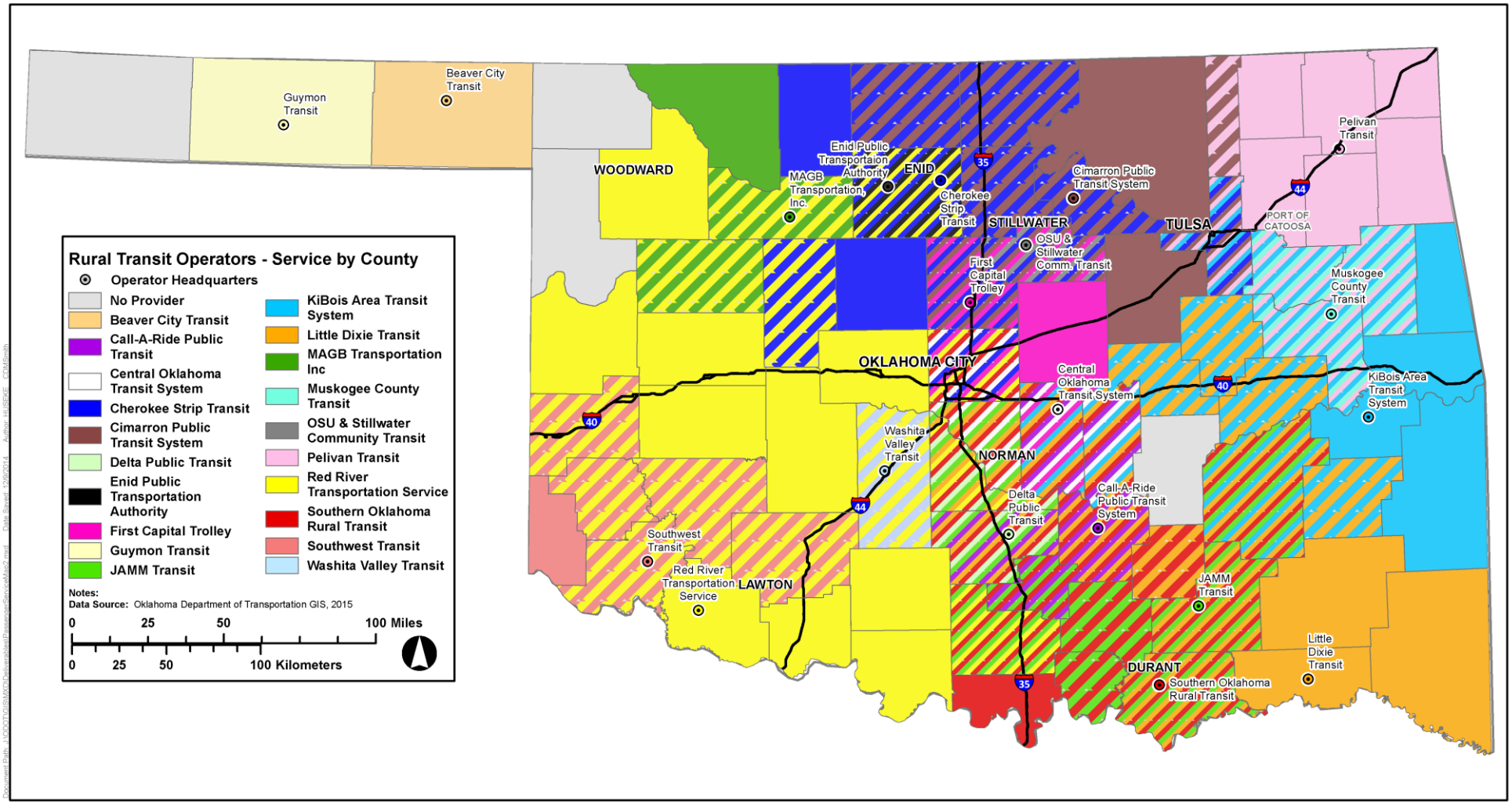
Oklahoma has twenty rural public transportation providers that operate in 73 of the 77 counties geographically spread across the entire state **(Figure 6-9)**. These rural transit systems provide more than 3 million trips annually with approximately 25 percent of the trips made by the elderly and persons with disabilities. The rural transit agencies provide transport for various journeys – a ride to work, a medical appointment, or to shop for necessary items. ODOT receives FTA funds and distributes them on a formula basis to the rural transit agencies.

Urban public transportation systems serve communities with populations of 50,000 or more. Oklahoma has five urban transit systems that include Citylink in Edmond, Cleveland Area Rapid Transit which serves the City of Norman and the University of Oklahoma, EMBARK in Oklahoma City (formerly Metro Transit), Lawton Area Transit System, and Tulsa Transit System.

- Citylink in Edmond, runs five local routes serving the University of Central Oklahoma (UCO) campus and a large portion of the City of Edmond, as well as an express route to and from downtown Oklahoma City.
- The Cleveland Area Rapid Transit (CART) was founded in 1986 and serves the City of Norman and the University of Oklahoma. In 2007, CART's service area and hours of operation were increased substantially. This increase required an additional local investment of nearly $7 million in capital and operating costs.
- EMBARK is the largest transit agency in the state and has at least 20 interconnecting bus routes as well as the "Oklahoma Spirit Trolleys" covering the Oklahoma City Metropolitan Area. EMBARK also includes paratransit ADA bus service and specialized transit services.
- The Lawton Area Transit System (LATS) operates fixed route and paratransit services for the City of Lawton and the Fort Sill area. Two buses operate the fixed routes and five vehicles are used for paratransit services. These vehicles provide an average of approximately 160 passenger trips each weekday.
- The Metropolitan Tulsa Transit Authority (Tulsa Transit) was established in 1968. Tulsa Transit transports approximately 10,000 passenger trips each weekday utilizing 21 routes.

ODOT provides state transit revolving funds to urban transit agencies that are direct recipients of FTA funds. Each urban transit agency participates with its respective MPO for the purposes of long range planning efforts. Greater detail on current and future public transportation services is closely examined and addressed during the MPO LRTP process, which occurs every five years.

Figure 6-9. Oklahoma Passenger Service Map



Source: Oklahoma Department of Transportation, Transit Programs.

Oklahoma has seen a substantial growth in the Tribal Transit Programs in the last five years. Oklahoma has 38 recognized tribes and there are 14 tribal transit providers. These tribal transit agencies provided 231,123 regular trips in 2012. Similar to rural transit, the federal tribal transit program is instrumental in providing needed transportation to tribe members to access work, medical appointments, or shopping.

Even though the tribal transit agencies are direct recipients of FTA funds, ODOT's Transit Program Division reaches out to the tribal transit agencies to identify opportunities to coordinate with rural transit services.

6.7.2. Passenger Rail Service

Passenger rail returned to Oklahoma in 1999 after a 20 year absence. The Amtrak Heartland Flyer operates round trip daily service between the Santa Fe Depot in downtown Oklahoma City and the Fort Worth, Texas Intermodal Transfer Center. Currently, ODOT provides $2.8 million annually to operate the Heartland Flyer. Ridership has steadily increased and the Heartland Flyer transports approximately 82,000 passengers per year. The Heartland Flyer trip is 206 miles with intermediate Oklahoma stops in Norman, Purcell, Pauls Valley, Ardmore and then Gainesville, Texas before arriving in Fort Worth.

6.8. AVIATION

Oklahoma is home to a large number of airports supplementing local, regional, and national needs. The three primary airports in Oklahoma are the Tulsa International (TUL), Will Rogers World (OKC), and Lawton-Fort Sill Regional (LAW) airports. In addition to being identified as primary airports because of the number of passengers boarding each year, both Tulsa International and Will Rogers World are cargo service airports (facilities with aircraft providing cargo transportation with a total annual landed weight of more than 100 million pounds). Based on FAA data, Tulsa International consistently has a landed weight of over 300 million pounds and Will Rogers World consistently has over 200 million pounds. Lawton-Fort Sill Airport maintains significant use by military personnel.

Each airport is independently operated and is not under ODOT responsibility. ODOT provides safe and efficient access to airports; however the agency does not provide funding to airports.

There are 113 general aviation airports and seven regional airports in Oklahoma. Oklahoma's regional airports are: Bartlesville Airport, Woodring in Enid, McAlester Airport, University of Oklahoma Westheimer Airport in Norman, Wiley Post Airport in Oklahoma City, Ponca City Airport, and Richard Jones Jr. Airport in Tulsa.

These airports support regional economies by connecting communities to regional and national markets. Regional airports also have higher levels of general aviation activity with some jets and multi-engine propeller aircraft that support corporate and personal travel.

6.9. BICYCLE AND PEDESTRIAN

Bicycle and pedestrian facilities throughout Oklahoma consist of multi-use trails, bicycle routes, and sidewalks. The planning and implementation of bicycle and pedestrian improvements are typically completed at the local government level, and/or through a MPO. Funding for these bicycle and pedestrian improvements is almost always from a combination of federal, local, and private and/or non-profit sources.

6.10. SUMMARY

Oklahoma's transportation system is a system that requires all parts to function well in order to provide safe and efficient movement of people and goods into, out of, within, and through the state. Each transportation mode has a special and important role to play and yet is interwoven with the other modes of the system. Whether people and goods travel by car, bicycle, sidewalks, bus, truck, rail, plane, barge, or multiple modes, ODOT works to provide a safe, economical and effective network so that they can reach their destination safely and efficiently.

6.11. ENDNOTES

[1] *The National Highway System (NHS) is a network of strategic highways within the United States, including the Interstate Highway System and other roads serving major airports, ports, rail or truck terminals, railway stations, pipeline terminals and other strategic transport facilities. This mileage reflects the NHS as of January 2012.*

[2] *The U.S. DOT tracks highway statistics by year. See Public Road Miles. http://www.fhwa.dot.gov/policyinformation/statistics/2011/hm10.cfm*

[3] *Pavement Rating Categories:*
All indexes are on a scale of 0 to 100, where 100 is the best.

0 - 59	*Critical*
60 - 69	*Inadequate*
70 - 84	*Tolerable*
85 - 100	*Adequate*

For more information on distress ratings, see the Distress Rating Guide produced by ODOT's Pavement Management Branch.

[4] *Additional information about the Travel Time Based Oklahoma Congestion Analysis: Pilot Study is documented in the 2015-2040 LRTP Technical Memorandum Travel Time and Congestion.*

[5] *In 2013, the Office of Freight Management and Operations (HOFM), on behalf of both HOFM and Office of Transportation Management (HOTM), contracted with HERE North America, LLC (formerly known as Nokia/NAVTEQ) to acquire the National Performance Measure Research Data Set (NPMRDS) vehicle probe data.*

[6] *The Oklahoma Department of Transportation Bridge Division is tracking the replacement and rehabilitation progress of deficient bridges. http://www.ok.gov/odot/Bridges.html*

[7] *For additional information of the benefits of using rail for the movement of bulk freight, please see Chapter 7, Section 7.4.2.*

[8] *A foreign trade zone is a secure area in or adjacent to a U.S. Port of Entry that is under U.S. Customs and Border Protection (CBP) supervision, but not required to follow the formal CBP entry procedueres and payments of duties required on foreign merchandise (until it enters territories under CBP protection for domestic consumption). While in the foreign trade zone, merchandise is not subject to U.S. duty or excise tax and goods can be exported from the sone free of duty and excise tax.*

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