



Sven C. Oehme, LL.M.
President, CEO

Comments regarding the request for comments concerning the U.S.-EU High Level Working Group on Jobs and Growth

The European-American Business Organization, Inc. (EABO), is a New York-based consulting business that assists companies from the EU coming to the United States whether they want to export or set up their own operations here. It also helps U.S. companies export to Europe or set up by entities there. The clients of EABO are primarily small and medium-sized businesses. EABO is part of the Enterprise Europe Network and a partner in the US-EU-Match consortium. Furthermore EABO is a member of the Transatlantic Business Dialogue (TABD) and the writer is a member of the TABD executive board.

EABO is respectfully submitting comments regarding the U.S.– EU High-Level Working Group on Jobs and Growth.

In general, EABO has experienced that its clients are companies with limited personnel resources. They usually do not have an export or international sales department. However, they want to take advantage of the opportunities that are offered to them in today's global markets. Over the last 18 months we have noticed a definite increase of U.S. small and medium-sized companies that are looking at exporting to Europe.

Our clients run into many of the same issues that the larger companies also face, but due to their limited resources they cannot devote as much time and human capital to

resolving many of the issues as larger companies are able to do. Not one of our clients has an office in the Washington, D.C. area. If they run into an issue they turn to us and ask us for resolving it, if possible.

Any relief from bureaucratic measures that are not necessarily justified because of product safety regulations, safety and security measures as such, and necessary product specific provisions are burdensome and should certainly be reviewed. Many of such issues also hit large companies and may be brought to your attention already.

With the limited resources that also a small consulting company has, it is rather difficult to assess the short- and medium-term impact on economic growth, job creation and competitiveness of the items discussed here. However, it seems obvious that reducing the number of obstacles will certainly increase the economic activity also of small and medium-sized businesses and thus create jobs. Time saved due to a reduction of red tape will lead to additional time available for growing the business.

Here are some suggestions:

For many business executives or owners crossing borders is a tedious and time-consuming process. The idea of having to wait at a border crossing in line for one or two hours as it does happen on occasion when people are coming to the U.S. can hold people back from engaging in economic activities. Furthermore, visa and work permit issues can be very discouraging. There are problems and issues on both sides of the Atlantic. Relatively frequently we are looking at the issue of obtaining work permits for U.S. citizens that plan to work in European countries, especially when their commercial activity includes longer periods of work in several countries. Easing some visa restrictions and a less tedious approval process for business people would certainly help in increasing economic activity.

First steps have been taken, however, for the business traveler and an expansion of the current program would be very welcome. In the U.S., Global Entry is a U.S. Customs and Border Protection (CBP) program that allows expedited clearance for pre-approved, low-risk travelers upon arrival in the U.S. Global Entry is open to U.S. citizens, lawful permanent residents, Dutch citizens (reciprocity), and Mexican nationals. For Canadian citizens and residents there is the opportunity to obtain Global Entry benefits through membership in the NEXUS program. Expanding this program to include more individuals who qualify would certainly be very helpful. A number of countries in Europe seem to have expressed an interest in joining the program lately. This should have broad support on both sides of the Atlantic.

At this time, European executives complain about long lines when they want to enter the U.S. at one of the major airports. At certain times of the day, when many flights arrive at a similar time the lines are getting even longer. If the people who frequently travel to and from the U.S. had an opportunity to enter the U.S., but also European countries faster, this would certainly improve their attitude towards doing business. Nobody likes to wait, and especially not when one has been on a long flight on a crowded plane and is tired. Lines in Europe at points of entry at major airports can also be long. A faster processing procedure for pre-screened and approved individuals sends a positive message and creates an 'open for business' image.

In many European countries young people have great opportunities through vocational education and training. They learn their skills from experienced and to well-educated craftsmen. The U.S. does not to have such a system. While the training in Europe is focused on improving the skills of the young people, the service aspects of the running business where such a skills can be used have not gotten as much attention in Europe. As Europe is also moving towards becoming a service industry it is still lagging behind the U.S.

My suggestion is to establish a program which would allow young workers the opportunity to do an internship abroad at a facility where they can participate in training their manual and technical skills and also learn to run a service-oriented business. Such an exchange program may send the participants to a foreign country for about to six months. However, the experience that they will acquire will be extremely valuable for their future careers.

With the skills that they have obtained abroad, these people will be much better qualified to have improved career opportunities. They may advance faster in the company that they are working for or may set up their own business because they have additional skills that their colleagues don't have.

Such a program may be organized at the level of business organizations, the unions, chambers of commerce or other business and industrial organizations.

This will give young people who don't attend a university a much improved outlook for their work life. It will give them a greater opportunity to go into business by themselves and hire younger people that they can train in turn.

As mentioned EABO is part of the Enterprise Europe Network. Under the current agreement US-EU-Match is an Article 21.5 (CIP) partner. It would be beneficial if the U.S. can be convinced to fulfill the criteria of Article 21.4 (CIP). Having a consortium under this provision would allow for an easier expansion of the Enterprise Europe Network in the U.S. This will facilitate activities and cooperation of small and medium-sized companies on both sides of the Atlantic. In case the discussions concerning the High Level Working Group on Jobs and Growth will lead to a new Transatlantic Partnership (TAP) agreement the expansion of the Enterprise Europe Network in the U.S. should be part of the agenda.

These are only a limited number of comments due to time constraints. I would be happy to expand on any one of them.

New York
April 23, 2012

A handwritten signature in black ink, appearing to read "S. Oehme". The signature is written in a cursive, somewhat stylized font. The first letter "S" is large and loops around the "O". The "O" and "E" are connected, and the "H" and "M" are also connected. The "E" has a long, thin tail that extends downwards and to the right.

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