

CBP Proposal for Advance Trade Data Elements

Security Filing

“10 + 2”

Presented By: John Jurgutis

CBP



**U.S. Customs and
Border Protection**

5/2/2007

1

Justifications for Security Filing

- Enhance Targeting and Risk Analysis Capabilities
- Improve Facilitation of Lawful International Trade
- Required by SAFE Port Act 2006



U.S. Customs and
Border Protection

Background (SF Roadmap)

- Advance Trade Data Initiative (ATDI)
- CBP Targeting Taskforce (March-May 2006)
- **SAFE Port Act (2006)**
- Consultative Process (November 2006-March 2007)
- Strawman Proposal
- ATDI Part II
- Notice of Proposed Rule Making Process
- Current Updates



U.S. Customs and
Border Protection

Advance Trade Data Initiative

What we knew:

The trade community relies on various documents and data to facilitate commerce and conduct day-to-day business.

What we learned about the data:

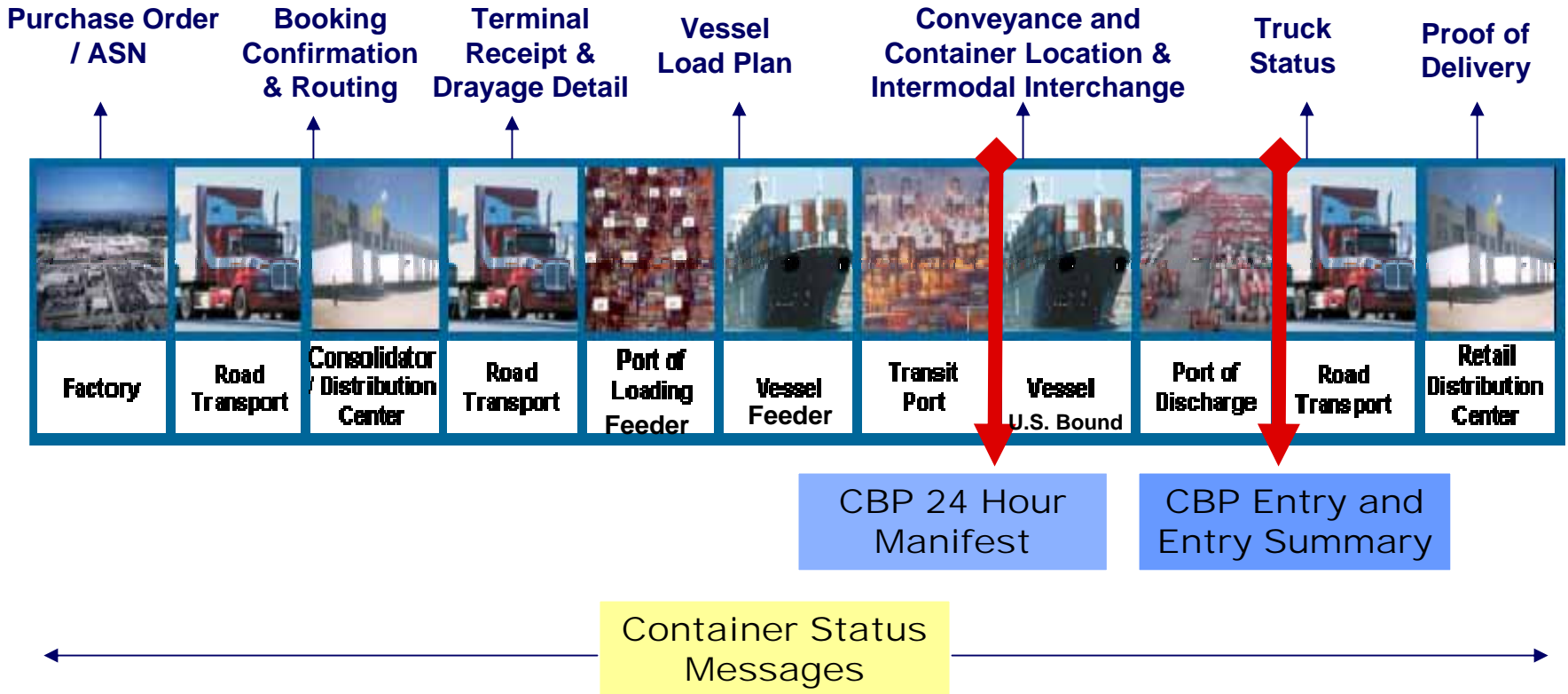
- Enhance both CBP's automated and officer-based Targeting efforts
- Increase the transparency of key participants, cargo and events
- Increase confidence in CBP's trade facilitation function



**U.S. Customs and
Border Protection**

ATDI is a Partnership With Trade To Identify Information In Today's Supply Chains Capable of Strengthening DHS Risk Management Efforts

Gather, Fuse and Assess Data From the Global Supply Chain. Develop a Risk Profile -- Act at the Earliest Point



U.S. Customs and Border Protection

CBP Targeting Taskforce

Objectives Met:

- Identified sources of information
- Conducted a qualitative review of existing data elements
- Received input from industry experts

Conclusion:

- The right data at the right time is critical.
- Identified which additional data elements should be mandated to improve security targeting.



**U.S. Customs and
Border Protection**

SAFE Port Act of 2006

- New Data Requirements

Section 203 (a) (1): Secretary shall “...identify and seek the submission of data related to the movement of a shipment of cargo through the international supply chain...”

Section 203 (b): Secretary shall “...require...additional data elements for improved high-risk targeting, including appropriate security elements of entry data...to be provided as advanced information ...prior to lading...” at the foreign port.



**U.S. Customs and
Border Protection**

SAFE Port Act of 2006

- Consultative Process Required

Requires consultation with stakeholders (including COAC) and that the Secretary “identify to them the need for such information and the appropriate timing of its submission”.

Requires consideration of costs, benefits, and feasibility of requiring additional non-manifest data, reducing the time period for revising cargo manifests and for submission of certain elements of entry data.



**U.S. Customs and
Border Protection**

Consultative Process

- Trade Support Network
- Commercial Operations Advisory Committee
- Joint Industry Group (JIG) - CBP addressed JIG conferences in August 2006 and February 2007
- AAEI – CBP panel discussion January 2007
- NCBFFA – met with leadership February 2007
- U.S. Chamber of Commerce – single issue discussion February 2007
- AAEI “Webinar” – March 2007
- CESAC – March 2007



**U.S. Customs and
Border Protection**

Strawman Proposal

- Posted on cbp.gov website

Importer Requirements

10 Data Elements

- **Manufacturer (Supplier) name/address**
- **Seller (Owner) name/address**
- **Container stuffing location**
- **Consolidator (Stuffer) name/address**
- **Buyer (Owner) name/address**
- **Ship to name/address**
- **Importer of record number**
- **Consignee number**
- **Country of origin**
- **Commodity HTS-6**

Carrier Requirements

2 Data Sets

- **Vessel Stow Plan**
- **Container Status Messages**



**U.S. Customs and
Border Protection**

ATDI Part II

- ATDI “test bed” – announced the test at the Houston COAC meeting
- Testing “Importer’s 10”, CSMs and Stow Plans
- Test data transfer protocols and develop schemas
- Excellent participation across trade sectors (Importers, Brokers, Freight Forwarders, Carriers)
- Data is flowing
- Still accepting limited number of new participants



**U.S. Customs and
Border Protection**

NPRM Process

- Review Comments from Public and COAC
- Cost, Benefit, Feasibility Study
- Draft regulatory language
- CBP, DHS and OMB Review
- Posting in Federal Register
- Public Comment Period
- Final Rule



U.S. Customs and
Border Protection

Current Status (Importer's 10)

- Defining the Importer's 10

All the merchandise¹ being imported by an importer of record² at the lowest bill level³ (Straight or House level) arriving on a single conveyance⁴.

- Scope is Limited to Maritime Cargo

- Single Filer, Single Document, Single Transmission

- 24 Hours Prior to Lading

- Responsible party: Importer or Designated Agent



U.S. Customs and
Border Protection

Current Status (Importer's 10)

- Filer must be registered, bonded and have access to CBP systems
- 6-digit HTS, MFG, CO linkage
- CBP may require a limited set of data for FROB, IE, TE shipments.
- Amendments required until vessel arrival
- CBP may allow concurrent SF, 3461 and 7501 filing.
 - But, 3461 and 7501 will not substitute for SF I-10



U.S. Customs and
Border Protection

Current Status (Importer's 10)

- Bulk shipments may be exempt from SF I-10.
- Break bulk shipments not exempt from SF I-10.
- CBP will not accept the MID from the CBP 3461
- CBP will accept 10-digit HTS
- CBP will use existing data transfer protocols (AMS, ABI)
- CBP will send affirmative message back to filer



Current Status (Carrier's 2)

- CBP's goal is to obtain all CSMs all the time
- Focus is on US Bound movements
 - Minimum requirements will include gate-in, gate-out, load/discharge
- Stow Plan within 48 hrs of departure
 - NLT prior to arrival for short trips



U.S. Customs and
Border Protection

Questions?

John Jurgutis

Program Manager

Security Filing

Customs and Border Protection

(202) 344-3714

john.jurgutis@dhs.gov



**U.S. Customs and
Border Protection**



U.S. Customs and Border Protection