CBP Proposal for Advance Trade Data Elements

Security Filing

“10 + 2”

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CBP
Justifications for Security Filing

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

Purchase Order / ASN
Booking Confirmation & Routing
Terminal Receipt & Drayage Detail
Vessel Load Plan
Conveyance and Container Location & Intermodal Interchange
Truck Status
Proof of Delivery

Factory
Road Transport
Consolidator/Distribution Center
Road Transport
Port of Loading Feeder
Vessel Feeder
Transit Port
Vessel U.S. Bound
Port of Discharge
Road Transport
Retail Distribution Center

Container Status Messages

CBP 24 Hour Manifest
CBP Entry and Entry Summary

U.S. Customs and Border Protection

5/2/2007
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.
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.
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.
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
Strawman Proposal

- Posted on cbp.gov website

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<th>Carrier Requirements</th>
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<td>2 Data Sets</td>
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<td>- Vessel Stow Plan</td>
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<tr>
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<td>- Country of origin</td>
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<td>- Commodity HTS-6</td>
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U.S. Customs and Border Protection

5/2/2007
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
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
Current Status (Importer’s 10)

- Defining the Importer’s 10

  All the merchandise being imported by an importer of record at the lowest bill level (Straight or House level) arriving on a single conveyance.

- Scope is Limited to Maritime Cargo

- Single Filer, Single Document, Single Transmission

- 24 Hours Prior to Lading

- Responsible party: Importer or Designated Agent
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
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
Questions?

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