

**Commercial Operations Advisory Committee (COAC)
TO U.S. Customs and Border Protection**

Executive Summary

**1:07 p.m. to 4:45 p.m.
Wednesday, January 13, 2016
New Orleans, Louisiana**

Committee Welcome and Committee Roll Call

Maria Luisa Boyce welcomed everyone to the meeting and began the committee roll call. The committee members present are as follows: Julie Parks, Vincent Iacopella, Cindy Allen, Brenda Barnes, David Berry, Scott Boyer, Heidi Bray, Liz Merritt, Celeste Catano, Lenny Feldman, Brandon Fried, Lisa Gelsomino, Susie Hoeger, Alexandra Latham, Amy Magnus, Kevin Pinel, Adam Salerno, Madeleine Veigel, Michael White, and Michael Young were present.

Ms. Boyce then introduced Commissioner Gil Kerlikowske for opening remarks.

Opening Remarks by Gil Kerlikowske, Commissioner of CBP

Commissioner Kerlikowske welcomed everyone to the fourth session of the 14th term of COAC here in New Orleans. He said everywhere he has visited when on the road during the Christmas holidays, he has had a chance to thank our people who work during the holidays, nights, and weekends at LAX, last year at JFK. He thanked them for doing a terrific job.

He said Assistant Commissioner Brenda Smith and the Consumer Product Safety Commission was responsible for children not receiving Hover boards for Christmas because a lot of the UL stickers on the batteries were counterfeit. He said Hover boards were not allowed as carry-on or cargo on airplanes due to CPSC's actions and partnership with CBP. Mr. Kerlikowske mentioned Tim Skud from the Treasury's office, Seth Stodder our Assistant Secretary, Threat Prevention and Security Policy at DHS and CBP's Co-Chairs Vince Iacopella and Julie Parks. He said he welcomes Assistant Commissioners Brenda Smith from Trade and Todd Owen and Charlie Armstrong from IT. Gratitude to the following was also expressed by Mr. Kerlikowske: CBP's Chief Financial Officer Jaye Williams, Mark Koumans, Charlie Stallworth's replacement, Patrick Schmidt, Maria Luisa Boyce, Cynthia Whittenburg, Deborah Augustin, Troy Riley, Alice Kipel, the Executive Director of Regulations and Rulings, David Long, Gerry Horner, Dale Kelly, Doug Stearn and Dominic Veneziano, and Jim Joholske with CPSC.

The Commissioner said the agenda today contains a lot of important information and will end with an update on the Trade Efficiency Survey.

Opening Remarks by Timothy Skud for Department of Treasury

Deputy Assistant Secretary Timothy Skud told the group that he is always interested in advice, comments, and knowledge that COAC has to share. He is interested in advice regarding the International Trade Data System, the Single Window, the rollout automation that will automate 300 never-before-automated forms and said it is more exciting due to the switch from the Automated Commercial System (ACS) to the Automated Commercial Environment (ACE) platform. He reported that COAC has coordinated with CBP to identify best practices within the U.S. and abroad to achieve more standardization.

Opening Remarks by Seth Stodder for Homeland Security

Assistant Secretary Seth Stodder expressed his support for the Single Window and International Trade Data System (ITDS) and stated that it is an important project to the trade community. He is excited to push this effort across the goal line. He said he is very interested to hear the discussion on Trusted Trader Committee and the Global Supply Chain Committee and other areas of focus. He said he is interested, too, in looking at Transportation Security Administration (TSA) and others on a world holistic Department of Homeland Security (DHS) approach to commerce issues especially as we're seeing more small and mid-sized enterprises and more consumer shipments.

Remarks by Vincent Iacopella and Julie Parks

After thanking Commissioner Kerlikowske and Deputy Assistant Secretary Skud, and Assistant Secretary Stodder and the New Orleans team, Mr. Iacopella said he looks forward to presentations by the Trade Modernization, Center of Excellence and Expertise Uniformity and the International Engagement Trade Facilitation working groups. He announced that he is excited to take on the Code of Federal Regulations (CFR) broker regulations expediting the schedule and said he hopes there will be a recommendation to CBP.

Mr. Iacopella reported that the Global Supply Chain subcommittee did a lot of work on the Pipeline Working Group and that there are no recommendations at this time. He said the One U.S. Government at the Border subcommittee will reemphasize recommendations made in July and October regarding ACE and Single Window.

Mr. Iacopella said there is a new working group now called the North American Single Window Vision. He said this group is focused on Canada, Mexico, and the U.S. regarding transaction cost reduction for the southern and northern borders. He explained that readiness has different meaning depending on one's industry sector.

This is because of different places having different business models. Each entity is dependent on the software vendors which vary from sector to sector. He said that each entity is dependent on the government to have their part ready as well as Partner Government Agency (PGA) data status that might be changing, depending on customers that we service. He explained that there are a lot of different variables for each customer. He said CBP will work in an advisory capacity to determine which aspects might cause challenges to filers and focus on those issues for the next couple weeks. He said he hopes to have recommendations made in two or three weeks.

In spite of the variables and uncertainties, Mr. Iacopella stated that COAC has unwavering support for Single Window and the value it brings the supply chains into our companies.

Julie Parks assured the group that the trade community will meet the goals and that CBP ports and CBP headquarters will make it happen. She thanked the Port of New Orleans for their hospitality yesterday. She said she likes to get feedback and to understand how things are actually working in the Port.

Ms. Parks announced that the group will hear recommendations from the Trusted Trader Subcommittee later today. She said the Trade Enforcement and Revenue Collection Subcommittee will have reports on their three working groups during today's session but there won't be any recommendations presented today.

She reported that her alma mater, the Export Manifest Work Group will present information on the export manifest pilots, and the group will hear what the Post Departure Filing Work Group is working to achieve. Ms. Parks said the group will hear about some of the resources that have been granted in the export side. She added that in collaboration with CBP and Directorate of Defense Trade Controls (DDTC) have automated a manual process which was a lodging of DSP5s and that they are looking forward to the DSP73 endorsements going live.

Trade Modernization Subcommittee

Co-Chair Lenny Feldman reported that the Trade Modernization Subcommittee now has three working groups in progress. He said they have over 40 volunteers from the trade community. He thanked those in the trade community who have helped them to achieve their goal which is to work on the strategic vision to enhance predictability, transparency, and efficiency in today's progressive trade environment. He said that looking forward they want to see in an entrepreneurial way how they can work with the government, the CBP, and the PGAs to make a positive effect on the commercial environment and the international trade world.

Mr. Feldman presented a summary of the accomplishments of the Centers of Excellence and Expertise Uniformity Work Group. He mentioned that the Centers of

Excellence and Expertise are now being called Centers. He said the feedback is very positive and that the trade community would like to see the centers do even more, if possible, subject to resource allocation.

Regarding technology, he said there is an ACE portal and a Customs Trade Partnership Against Terrorism (CTPAT) portal. He said there is a mechanism so that trade alerts or trade information coming from the Centers is seen as an exciting possibility. In addition, members of a Center are similar to being a shareholder in a company. In the example he asked if the shareholder will get an annual report. He said there is ongoing back and forth communication and that what they are hearing is positive. He stated that the key to the centers is uniformity. He asked whether resolutions are occurring in a timely manner and whether there are now less requests for information and notices of action as Customs gets to know the accounts. He said he believes the accounts get to know CBP and understand what's going on.

Mr. Feldman said another item that have been discussed as a trade community with the government is expanding the centers, the business transformation initiatives that are important to Executive Assistant Commissioner Owen, to Executive Assistant Commissioner Smith as well, and her contacts. He asked how they might be able to take what has seemed to be disparate types of functions that all work collectively and get them to serve as a trade facilitation forced multiplier. He asked how the enforcement piece -- the fines, penalties, and forfeiture -- provide uniformity that is really desired.

Mr. Feldman said he is looking forward to the leadership of Alice Kipel who has a private industry background as well as a legal background. He explained that friends at participating government agencies will be called into the centers as needed for a one-to-one relationship and quick responses.

Co-Chair Cindy Allen took the microphone and reported that there have been three productive phone calls on the international engagement. She welcomed Mark Koumans from Office of International Affairs (INA) to the group. She said most of the individuals are already engaged on an international level within their own companies so they have expertise as well as experience. She added that many have brought data and studies to share. She reported that United States Agency for International Development (USAID) and other interagency partners will be involved in the subgroup. She said they are working to identify practices and policies with the intent to produce a matrix to help determine where to spend time and where to make recommendations to CBP to further their time at an international level.

She explained that they want to make sure there is a commercial interest in the U.S. that would drive some of the changes to be made from the U.S. perspective. She said they plan to identify regional leaders who can influence other countries to make similar changes to remain competitive in a commercial environment. She reported that they

are making recommendations to CBP regarding where to focus for the best benefits for the trade and for CBP and to look at things such as mutual recognition agreements, identifying beneficial changes, areas that can be leveraged further on an international level from a U.S. perspective, how to leverage programs such as the Trusted Trader, role of technology data exchange, e-commerce and its role in the future. Ms. Allen said they are interested in seeing how to simplify processes and how to reduce costs for all involved.

Ms. Allen said they will meet next week to build on work done in the 12th and 13th COAC as a last step in the process. She explained they will look at areas of agreement and challenges in order to set an approach to include all the parties in the role of the Supply Chain. Ms. Allen said the group includes importers, exporters, customs brokers, freight companies, and the express industry.

Mr. Feldman took over the microphone to conclude the presentation. He explained that various sized brokers are involved as well as various regions in order to match expertise at port and district levels. He said that two live meetings are planned. The first meeting will be in the Washington, D.C. area next week. He said they plan to determine areas of agreement between the government and the trade community as to the direction to take, and to discuss supervision and control and permitting, record retention, confidentiality requirements and continuing education. He said broker fees and reporting will be discussed.

Maria Luisa Boyce introduced CBP Executive Director Ms. Cynthia Whittenburg who thanked Mr. Feldman and Ms. Allen for their vision and innovative leadership. Ms. Whittenburg introduced Director Schmelzinger who she told the group would give an update and highlights about the centers.

Director Liz Schmelzinger told the group that she is playing the role of Director Susan Thomas and that her remarks are on the Director's behalf. She reported that CBP has now brought four Centers into full operability and they will hopefully have all the centers operable in June of this year. She explained that centers manage all entry summaries for industry accounts which provides consistency, uniformity, and efficiency in trade processing. She said recent meetings of the working group have concentrated on providing status of the centers and their operational capabilities as well as our in state division. Ms. Schmelzinger added that the trade working group members haven't provided feedback on the interactions of the centers to date.

CBP Executive Director Troy Riley emphasized that the work done during the 12th and 13th COAC was carried forward into this working group so they are not starting from scratch. He said they are bringing in personnel from the Office of Administration and, the Centers, as well so there is a full rounding of expertise being brought in to look at it from all sides.

Ms. Boyce interrupted and highlighted that because the team and its members have don't a great job that the amount of work that they have with National Customs Brokers and Forwarders Association of America (NCBFAA) has been very practical.

Executive Director Whittenburg told the group that more countries are being gained every day toward ratification of the World Trade Organization (WTO) Trade Facilitation Agreement (TFA). She said 11 trade facilitation indicators have been developed that will provide the most current assessment of the potential impact of implementing the measures included in the WTO TFA. She said another piece of the plan has to do with mutual recognition arrangements and that they are looking to maximize the mutual recognition arrangements. She said that three committees have been talked about, but several are in waiting stages at this time. One of the committees that will get started later this year has to do with revenue modernization.

CBP Chief Financial Officer (CFO) Williams was introduced to give an infomercial on CBP Revenue Modernization. Ms. Williams said that 2.5 billion of the transactions are collected manually which occurs whenever someone accepts cash or checks. Of this 2.5 billion 1.6 is collected at ports of entry. This is 3.4 million in transactions. She said this involves a lot of financial reconciliation, engagement with banks; therefore a meaningful amount of field resources are engaged in this collection process. She said their goal is the same as it was with eBond where they automated it for efficiencies around how one engages with CBP. She said she wants to eliminate all cash.

CFO Williams listed a number of agencies for whom they collect money: IRS, Corps of Engineers, a number of DHS organizations, Secret Service, ICE, and the U.S. Department of Agriculture. She said the goal is to eliminate cash and checks to streamline all processing, create efficiencies for both the trade and travel community as well and the U.S. government. She explained this could be accomplished by moving to prepayment options. She said that ACE and the SAP financial systems will be used to help improve existing business processing systems and elements of reproof reconciliation, focus on smart safes, and technology handling issues.

She continued and said they want to understand the paying points and their objective is to understand this to make sure that the things most important can be incorporated in the solutions. She summarized and said the benefits they expect are alignment of collection processes to industry best practices, reduction of transaction costs and administrative burdens, elimination of paper and check processing, more flexibility in payment methods, and facilitate greater speed to market.

Ms. Allen added a special thank you to member Adam Salerno for his role as a silent third co-chair of the international engagement and to the U.S. Chambers' input to this committee.

In response to Maria Luisa Boyce's call for comments and questions, Mr. Feldman stated he believes there is going to be a lot of interesting duality to those we're going to want to look at because that's what we've been saving revenue with our changes and modernization. He asked what will happen if he has commodities that fall into two Centers since it seems to be a moving target and it will affect the entire trade community.

Ms. Boyce took a question from Michelle Twomley (phonetic): Why is Foreign Trade Zone (FTZ) being controlled at the port instead of (inaudible)? Ms. Boyce replied that Centers are divided by industry, not foreign trade. She explained that the centers being discussed were importer industries and that some importers that have FTZs will be dealing with the centers depending on the commodity and what the center is; so, it's not like the centers are managing the process. She told Ms. Twomley that if you have a commodity that falls within that center, you will have the questions that can be addressed at the center for that level.

Export Subcommittee

Co-Chair Liz Merritt reminded the group that they divided the export subcommittee into manifest and commodity. She said she will take care of the manifest report first and then move to Option 4, the Commissioner's favorite topic. She thanked CBP for the productive joint work in discussion and the development of recommendations, and specifically thanked Bill Delansky, Jim Swanson, Ed Moriarty, and Robert Rawls. She also noted that the participation of OR&R in the manifest work group had been particularly helpful, as they provided much-needed feedback with regard to things they are looking for in terms of compliance and enforcement.

Ms. Merritt said she views 2015 as a year of high level policy development and 2016 as a year to focus on practical work. Pilot programs in air, ocean, and rail are ready to kick off early this year. The truck manifest is just getting kicked off because of heavy interaction with Canada and Mexico and with the concept of a North American Single Window, the truck work is exceedingly complex. She thanked member Mike White of the International Air Transport Association (IATA) for taking on the challenging task of the truck sub-group.

Ms. Merritt stated that the biggest unresolved issue is early targeting, meaning accomplishing risk assessment as soon as the shipment data is able to be transmitted, before the transport information is available. Getting the majority of targeting done without knowing the port of export is going to be tough even though it doesn't sound like it should be.

Co-Chair Heidi Bray thanked CBP members, Jim Swanson, Ed Moriarity, and the leadership at Customs and Border Protection, and Commissioner Kerlikowske especially for his dedication to Post Departure Filing formerly known as Option 4. She

reported that in 2015 they put forth a post departure filing proposal. She added that CBP provided information about what they see as risks, and they accomplished a lot on the progressive filing model. She said they hit a brick wall and that the post departure filing group was reestablished in November of last year.

Ms. Bray said that in 2016 all the work will be put into a desktop exercise that will incorporate CBP's risk document, the proposal, the progressive filing, and the advance manifest. She said next they plan to move into documenting all of Custom's risks and how they can be addressed in the new proposal that's been put forth. She explained that they want to make sure Customs knows they understand Custom's risks. She said the next step will give Customs an opportunity to come in and look at processes, best practices, and internal controls -- very similar to Importer Self-Assessment (ISA). Next, Customs would be provided with predictive information -- what post-departure filers know will be sent out, exported in the next 12 months and provide that to Customs in advance, along with information about what the commodity is and the parties being dealt with. She said that a pilot will come next and finally, the proposal will be put into action.

Ms. Bray said they hope that the group will be able to work closely with Customs to reach an agreement to set up a program to be able to have key data earlier in the process than they do today. She said they also want to create something that everyone who wants to will be able to participate in and hope the program will benefit new exporters as well.

CBP Director Jim Swanson thanked the COAC members for the work they've done to get them on the right page. He said their work was difficult because they needed to figure out the common points. He said their vision is to work collaboratively to create a well-integrated multi-mobile model for exports in the future. He explained that the only way to get this done is to change regulations and create rules that balance security and compliance responsibilities by looking at what is done with post-departure filing, with pre-departure filing, how they align licensing and permits, and how they get the transportation sector on board to identify the issues that are the highest risk prior to their departure so they can facilitate more than interdict.

Mr. Swanson said they want to facilitate movement of goods out of the country as early as possible and don't plan to close out the Option 4 system but hope to slowly phase it out and change the rules as they move ahead to work collaboratively with Census and others to find out what will and what won't work. Mr. Swanson reported that they hope to have the rail environment actually transmitting operational live data to them in a pilot before the end of January. He explained that the first step will involve the rail entity transmitting data while his group evaluates it to see what impact it has until they start exchanging messages and are able to leverage imports enforcement and target those pieces. He said they look forward to bringing others on board across the globe.

Mr. Swanson believes within the next several months they will have a good hard model built so they can start to roll people in with an aim towards discussing the final rule.

Ms. Kelly began by saying that being from the Census Bureau she appreciates the opportunity to talk about their mission. She said their mission is the data, collecting quality data that can be reported to help others make good business decisions. She said they want to separate some of the processes because they have historically collected information for transportation and commodities. She said they want to separate these processes now so that the data will now come from the party that best knows what's going on. They want to collect information about what is going out and coming into the U.S. as well as what port is involved.

Gerry Horner, Bureau of Industry and Security (BIS), said he would like to comment on the post departure filing program to say that the Bureau of Industry and Security as well as Commerce are willing to continue to work with CBP to find a solution that maintains exports' ability to file post departure on low-risk shipments to ensure all national security concerns are addressed. He said that many industry members in the Electronics Association and the Airspace Association have entered a post-departure filing program into their business process, and they won't change overnight. He said their efforts are to streamline this process to make sure the export clearance process continues smoothly for them. He explained that Option 3 was decommissioned because it was a burden for companies to go into the Automated Export System (AES) and file Census information twice for the same shipment. This happened after 9-11. Mr. Horner said he looks forward to creating a post-departure system that can benefit industry while still maintaining national security.

CBP Executive Director Debbie Augustin reminded the group that AES is now part of the ACE platform. She said they have deployed the functionality necessary to support ongoing pilots. She said 90 percent of their export processing functionalities are deployed into ACE while working through the ITDS framework to finish the integration with the export PGAs. She reported that Environmental Protection Agency (EPA) and AMS export-related functionality is complete. She said all export commodity filers can now file their transactions via the ACE portal, resulting in over 40,000 electronic export information (EEI) transactions filed via ACE, AES Direct since it was made available.

Ms. Dale Kelly reported that the Legacy AES Direct system has transitioned to ACE AES Direct, the new interactive system. All information can now be filed in ACE. She said outreach and education through webinars and seminars have been ongoing. She said training is going on in Louisiana right now on the new ACE export portal showing users how to use it. She said by mid February companies will be notified, based on EIN numbers, to let them know when they need to start transitioning because the Legacy system will be shut down.

To satisfy Ms. Boyce's request for statistics, Ms. Kelly said that since the ACE AES

Direct system was launched November 30, 2015, a little over 40,000 shipments have filed on the system. The numbers in the Legacy system went down by approximately 100,000 shipments last month. She said they average about 900,000 shipments per month.

Mr. Horner requested that if the regulatory agencies are involved in the vetting process for post departure exports in the future, it will be necessary to make sure they know ahead of time because they will need to build up again because the agency personnel that used to do the vetting are now gone.

One U.S. Government at the Border Subcommittee

Executive Director Debbie Augustin said she would like to provide a program update on ACE implementation -and touch on the current status of some of the recommendations made back in July and October of last year. She began with Recommendations 14, 15, 16, and 17 that address aspects of deployment communications. She said they actively communicate metrics in the monthly ACE adoption reports posted on CBP.gov and through the monthly Trade Leadership Council, and in various COAC Committee and Subcommittee updates. Daily Trade Call has also been implemented to address questions and review status of priority fixes and system issues that have been identified by posting the information on CBP.gov. She said scheduled ACE maintenance is also posted on CBP.gov. She said they also worked through the Trade Support Network (TSN) Technical Advisory Group to validate the use of the Cargo System Messaging Service (CSMS) messages. She explained that they have acted on feedback on the use of the TSN Technical Advisory Group to provide clearer and more timely messaging relative to issues on deployments.

Ms. Augustin said Recommendations 10, 11, 12, 13, and 14 are mainly related to milestone dates and general implementation efforts. She reported that COAC advocated the use or continued use of the automated commercial system for a set period of time and that the recommendations suggested possible incentives for filers who met the deadline of November 1st. She said COAC also called for accountability of filers who were putting forth minimal effort. She said recommendations stressed the importance of locking down the PGA message set. She said November 1st was the beginning of the transition period but the availability of the automated commercial system for cargo release was extended through February 28th of this year.

Ms. Augustin reported that they have a system that works and that overall production system availability for ACE is 98.3 percent which exceeds their established performance parameter of 97 percent. Almost all the capabilities necessary for the February 28th milestone have been delivered. She said as a footnote that they had communicated previously the quota implementation is tied to the scheduled to deploying ACE along with when the capabilities in ACS are no longer going to be available for entry and entry summaries, so that deployment strategy is still holding.

She admitted there are still some specific functionality issues that they want to work with Trade to better understand those issues and assess the impacts as noted.

She said that the recommendations that COAC previously presented regarding the document image system and the volumes associated with that, CBP has done the capacity testing for that and has validated that we can process the anticipated volumes as well as scale up easily and with flexibility in the event there is a need. She said that the results show that they can double their current capacity. Ms. Whittenburg with the air manifest implementation from last summer and the holiday season, CBP monitored the application with over a million transactions, and services were delivered without any loss of service performance.

Ms. Augustin reported some statistics: The entry summary submission rate grew from 72.5 percent in November to somewhere in the neighborhood of 76 to 77 percent in December. She said their ACE partner release submission rate grew from 11.6 in November to 13.48 in December. It is now trending toward the 20 percent marker. Eighteen of the 35 vendors report they will be able to transmit entries for PGAs in ACE by the end of this month. The remaining four report they will be ready by the end of February. Ninety-two percent of filers are associated with a vendor who is piloting FDA or ready to pilot. Sixty percent of filers are associated with a vendor who was piloting or ready to pilot NHTSA affiliates, and 67 percent of these are piloting or ready to pilot. 155 of our top 200 baseline filers have filed at least one ACE partner release. These filers account for 94.8 percent of our total carpet release. 189 of our top 200 baseline filers have filed at least one ACE entry summary which accounts for 80 percent of their total entry summary volume for the month of December. Outreach is continuing to filers who have not yet filed in ACE. She said the last outreach effort is in progress and will end at the end of this month, and training is ongoing. Ms. Augustin said 10 of their 15 PGAs who have entry and entry summary requirements are now processing transactions through ACE.

CBP Executive Director Cynthia Whittenburg reported that in reference to Recommendations 14018 and 14033, work is being done to create a draft process with a dual track, one which directs any changes needed to enable the system to operate as it's intended or programmed to operate. She said these changes, bugs, fixes, go to the ITDS Board to be triaged and implemented. She added that the ongoing track of establishing the change of control board that is run by the Board Interagency Executive Council, which would be a subgroup within the BIEC. The draft has been shared but is not ready for public consumption. Ms. Augustin wants to work with the COAC, the ITDS Board to get input to see if there are holes in the process.

Ms. Whittenburg discussed Recommendation 14034. She said they are sitting down through the BIEC Process Coordination and Risk Management Committees walking through messaging, the process flow, type of messaging Trade will see, what the agency sees, and walking through the process, what it will look like on the front line.

She said there is concern that agencies may not have sufficient bandwidth to respond to some of the messaging.

She said that Recommendation 14035 discusses the hold authority and those will be walked through and engaged in the tabletops with the council that will be used to form the entry business rules of process document. She said Recommendation 14016, National Guidelines Escalation Process War Room, will be stood up as has been done in the past.

David Long, BIEC representative, was introduced to talk about the external engagement of the BIEC. He said he will briefly explain how the recommendations are being used. He said this is a very large group comprised of all the agencies. He said it works through three committees, a risk management committee, process coordination committee, and external engagement committee (EEC). He said they take the recommendations for all these groups and ensure they are in the big process at the top level. He said the PGA is directly involved in all of these and responding to them.

He mentioned a couple things that BIEC is engaged in that have been part of the external engagement committee in the overall process. For Recommendation 14035, he mentioned that the BIEC and the agencies involved have worked closely to identify what is and is not achievable. He said essentially the work is to identify what is new and what is not new and has been focusing on the agencies. He said they are working on a February 28 deadline and expect to post the changes for public consumption in the few weeks coming.

He said that in reference to Recommendation 14033 the question is how to manage the data across the agencies. He said these have been monitored and fixed as things are experienced, and it seems to be working.

Mr. Long said another example where the BIEC function is getting all the agencies together on particular topics is requested in Recommendation 14034, monitoring and controlling non-essential data recordings. He said Food and Drug Administration (FDA) can address this topic and that there is a CBP/FDA working group of industry discussing this topic. He said this leads to the following questions: What needs to be done? What are we doing to get the word out to people?

In reference to Recommendation 14032, Mr. Long mentioned there is a series of webinars by topic and by agency and more will be added as the program develops. He said the Centers for Excellence provides plenty of outreach opportunities. He said they are working on turning process documents into something more broadly accessible with less technical language. He said in reference to the export field, particularly exporting data to BIS, Census, and CBP to get information out that they have a series of forums coming up to spread the word on this farther.

Captain Dominic Veneziano with the FDA said he will start with communication and outreach events and some of the work FDA has done. He said in December they held webinars associated with medical products and went over what the supplemental guidance is and how it relates to importers implementing the data elements. He announced that on January 19th of this month they will hold another outreach event related to food commodities and going over detailed elements of what the process requires.

He reported that they are doing work with CBP in terms of their top traders for over 58 regulated commodities. He said Mr. Stearn and their deputy commissioner have done some outreach in terms of talking to industry groups to see where they are in the process and to help identify obstacles that are or may be encountered.

He said that it is important to talk to the people that are not yet on board to determine what their obstacles are and to help the process to get these people on board. He said one of the recommendations related to the point of contacts both on the headquarters level and in the field. He said as more come on board and more entries are processed, one of the things to be concerned with is their resources to address issues. He said field personnel will be brought in in the very near future to be trained on what to look for and how to determine the differences between an entry process or an entry that's held up versus an IT issue related to ACE. He said they heard issues associated with potential delays.

Mr. Long said another recommendation had to do with increase staff and making sure timely issues are addressed. He said that they will need to look at deficient processes and that by increasing data elements as part of ACE, the IT systems will work smarter and prevent entries going to manual review. He said they are going through each of their centers to identify rules to allow low risk products to more quickly through the system rather than getting held up for a manual review.

He said they are working to insure uniformity across the system, and instead of having multiple chains of command, they are working toward a one-stop level to make sure everyone is doing the same thing across the country. He said they are establishing field-wide performance metrics to make sure timely releases are done. He said there is a dashboard at headquarters that shows where the delays are at any point during the process and makes sure that issues are addressed.

Mr. Long announced that the website will become a one stop shop and provide links to other agencies and centers so the import process will be better understood. He reminded the group that in December they eliminated the need to provide pre-validation data which helped get people to increase the number of shipments going through ACE.

He emphasized that it is extremely important to identify and get feedback on things or people that are not on pilot yet and whether they are having difficulty once the systems

are uploaded so that the problems can be resolved as quickly as possible.

Ms. Whittenburg filled in with some pilot data. She said there are currently 13 PGA pilots and said that they recognize the need to communicate an assessment or evaluation of each pilot and to publicize this information to Trade. She said they will be working with the One U.S. Government to watch for future valuation criteria and then move forward to assess pilots one by one.

Co-Chair Susie Hoeger commended the CBP and FDA for using more layman-friendly information in the Trade arena. She said the webinars and FAQs have been quite helpful. She said she is going to address importer challenges and readiness. She said her remarks today will reflect the input from medical devices, pharmaceuticals, chemicals, and a bit of the food industry from a survey recently taken from an importer standpoint.

Ms. Hoeger said her survey included two questions: Do you think your company will be ready for the February 28th filing deadline, meaning do you expect a seamless transition with no material impact on your supply chain and clearance times? She said if their answer was no, the second question was: Please rate your level of concern on a scale of one to five with one being I expect a few hiccups but I'm not losing sleep and five being I'm totally freaking out and think that imports will grind to a halt on February 28th. She said 16 respondents answered no. She said answers to the second question averaged about 3.3 which indicates a fair level of concern about supply chain disruptions and delays. She said the change to automated trade systems has led to the need for a lot of programming to make these transitions work from the importer's side. She said these are transitional in nature. She explained that the difficulty is that the data elements do not currently reside in import master data.

Ms. Hoeger said that increased cost has been a complaint that's been heard and expected. She explained that broker fees are increased and storage fees for cargo stopped at the border could be added costs. She said she believes these are all transitional costs that will disappear once they kinks are ironed out. She said that it is important to keep the trade moving for lifesaving drugs and devices needed by the American public. She said there are discussions about whether some of this new data that isn't currently required is required for admissibility after February 28th or not. She said the data could possibly be tracked down for future shipments. She said they are looking for contingency plans from CBP, FDA, and the other agencies.

Ms. Hoeger said that requiring intended use codes and brand names as mandatory data elements at the time of entry are problematic. She said shipment specifics require them to stop a shipment and assess why the return is coming back.

Co-Chair Amy Magnus introduced herself as Vice-President of the National Customs Borders and Freight Forwarders Association (NCBFAA). She said she was former

President of the Northern Borders Customs Brokers Association (NBCBA). She said she speaks for a large group of filers. The former represents about a thousand member firms, and the latter represents a large percentage of all of their entries filed in the U.S. Ms. Magnus reached out to the Northern Borders Customs Brokers Association to ask them how ready they are and how confident they are they will be ready by February 28th. She said even though this is a small representation of all brokers in the U.S. almost all said they were not confident they would be 100 percent ready for CBP or the three agencies. She said it seems to be dependent on the software providers. Other providers say they are working to be ready but they aren't ready yet.

Ms. Magnus said she won't talk about the adoption rate of ACE entry summary considering how long it's been available to the trade and how much the members have been pushed to get on board with ACE entry summary. She said when users started with ACE release, they discovered a different process and that the messaging coming back from CBP was confusing. She said in some cases industry members are highly automated with Electronic Data Interchange (EDI) connections with their importers. She explained that the EDI connections are complex and that data from the importer must be mapped specifically into the broker's system in order to be turned over to the agencies. She said some might not see this as a big deal, but a lot of companies they deal with are very large and though it is a shock to some in this room, their customs compliance is not necessarily a high priority within these firms. She said this leaves them with having to manually key in all data that was previously electronically transmitted.

Ms. Magnus said that it comes down to they either have to add the new data fields for databases that have thousands of parts. She said the 28th will really be in 22 days for them, and some importers of the U.S. are not going to be as ready as they hoped and wanted to be on the 28th.

Co-Chair Scott Boyer reported they have no new recommendations and he will review select subcommittee recommendations from July. Recommendation 14010 requires that CBP allow for a complaint period for filing the entry summary for entries that can't currently be filed in ACE. Regarding Recommendation 14011, COAC recommends that CBP continue to message February 28th as the mandatory filing date for ACE cargo release but implement a phased adoption schedule with COAC's input and industry acceptance for the complete implementation of ACE cargo release to ensure adequate time for programming, testing, training at the volume.

Regarding Recommendation 14012, Mr. Boyer stated that it's the last sentence that reads given the complexity of the PGA aspects of ACE cargo release, CBP should provide adequate time for the trade to program, test, train, and deploy after the conclusion of the pilots.

Regarding Recommendation 14015, Trade Briefings, Mr. Boyer read, COAC recommends that CBP provide COAC and the Trade with biweekly briefings and status reports, including metrics on each of the PGA's ACE pilots and general readiness for the mandatory filing date as well as CBP's future vision for ACE.

Mr. Boyer said it all comes down to a phased adoption approach, an informed compliance period, informed compliance by CBP as well as the PGAs and then emphasize contingency planning.

Ms. Magnus reported that a new Working Group has been established that consists of Mexican, Canadian, and U.S. participants who are working together to discuss similarities and differences about the import requirements of each country.

Maria Luisa Boyce reported that partnering with the Department of Commerce and Mr. Long's advisory committee (Advisory Committee on Supply Chain Competitiveness /ACSCC) is involved.

Beginning the comment period, Tim Skud commented on the North American Single Window and said that the documents he has seen don't mention the WTO data model and he believes this should be part of the BIEC. He said the working group should definitely keep the WTO model in mind.

Ms. Boyce called for comments for Single Window from Ms. Catano, Ms. Allen, and Ms. Bray.

Member Celeste Catano spoke on behalf of the software vendors and said thank you to Customs for holding the daily calls because he believes it helps everyone. Member Cindy Allen agreed that the daily calls are critical and added that we might want to think about policy calling before policy issues arise as they're being implemented.

Ms. Allen added that a contingency plan is necessary to deal with what's not ready, who is not ready, and at what state we will be ready from all perspectives, not just CBP but PGA's and the Trade. She agreed with Amy Magnus that a transition plan must be identified to deal effectively from an operational and a policy perspective.

Member Heidi Bray requested that Customs speak on the status of the Border, the programs on land borders for the benefit of those listening on the phone regarding where these programs are and how it will affect them on January 15th.

Executive Director Augustin said the issue with the functionalities supporting the processes has been communicated to the Trade so it can be fixed.

Member Lenny Feldman thanked the BIEC and Mr. Long for looking at the data and policy creep issues. He said there may be reasons for creating more of a mandatory

versus optional category for data elements if it will facilitate trade. He said Department of Energy just announced that instead of requiring an annual certification of admissibility for shipments, it is going to be required on a per shipment basis. He said they need to look toward July and discussions on the hybrid versus no hybrid rule. He said this will be critical as to whether they are all automated or partly paper or completely paper due to data and policy creep issues.

Ted Henderson (public participant) from Expeditors who commented that he sees positive features in ACE. He said the blending of the AMS data with commercial entry data is pretty cool. He said the group should have heard the joy that came out of Seattle when they did their first split air shipment to cargo release and all three pieces auto released without doing a thing, and nobody from Customs had to do anything. He added that Customs, CBP has done a great job. He suggested that a hard look be taken at the PGA piece.

Craig Seelig (public participant) with WiseTech Global is a software provider. He spoke about their experience over the last four or five years, months, and weeks and said he would break it down into the good, the bad, and the ugly. He said the good is that when ACE works, it works great. He liked the engagement with the trade. He liked PGA as well and forming working groups to trade and said both sides benefitted.

Mr. Seelig said one of the bad issues was that when there was a problem, the customers heard from CBP to just cancel it and do it in ACS. He said that's fine for today but not in March. He suggested CBP not recommend this and to figure the problem out so it doesn't continue to happen in the future. He said a similar problem with the PGA is that information cannot be updated after the fact. He said canceling the entry for a job that has probably already billed under that job number creates a problem when the billing had to be canceled and it all has to be redone. He said this is inefficient for the brokerage community to do this. He said that the additional data that importers have to provide the brokers during the pilot period is a transitional issue. He said a complaint the trade told him about was the requirement from the PGA's to send an e-mail list of all the entries made that had PGA data on them. He suggested it would be more efficient to reverse this step and have the list sent to the applicable PGAs and ask them to confirm they received all of those. He said this change would be helpful to the trade. Mr. Seelig said Amy asked him about definition of the parties, entities, and entry repeatedly. He said they have never gotten 100 percent clarity of terminology for entities.

Mr. Seelig continued with the ugly. He reported that the main ugly is the implementation guides not being scale and continuously being changed. He said specs have been changed on a Thursday night and they face the new specs on Friday morning. He said they have to make the changes and match them. The information has to go out to the importers to get the changes to the customers if your trying to get it interchanged EDI. He added that many brokers make software upgrades with little

notice. He said the brokers then have to upgrade their systems. He said this is an added difficulty for international companies that have one big system that runs multiple countries. He said adding one new field sounds minor, but it can be a big deal.

Mr. Seelig continued to say that they received implementation guides rather late for changes to the entry type FTZs. He said another challenge is the collection of PGA data on weekly entries instead of at the time of the weekly estimate, time of entry summary. He said one customer reported they will have to hire four people to handle this change because he has 1,000 line items to key in. He said if you want to get a good flavor of where things really are and what's really going on and the level of perspective is to listen in on the daily calls.

Ms. Boyce commented that they are making fixes based on what the industry said needed to be addressed and called for a brief break.

Trusted Trader Subcommittee

Co-Chair Alexandra Latham reported that in the past quarter the subcommittee has developed several recommendations. She said the COAC strongly believes the value of the Trusted Trader concept is integral to the global supply chain in order to advance trade facilitation objectives.

Co-Chair Michael Young presented the recommendations being made as follows:

First Recommendation: COAC recommends that CBP formalize a vision of an enhanced Trusted Trader Program. The enhanced Trusted Trader Program should consider inclusions of partner government agencies, flexibility of participation based on supply chain roles, (importer, exporter, carrier, etc.), and be built in a foundation of national and international interoperability to provide facilitation to global supply chains. This enhanced Trusted Trader Program should be both beneficial and attainable for all sizes and types of business by being scalable, achievable, and by providing tangible benefits.

Second Recommendation: COAC recommends that the enhanced Trusted Trader Program is the result of a co-creation with the COAC and the trade community to evaluate existing programs and criteria, articulate incremental benefits, and develop the future vision.

Third Recommendation: COAC recommends that CBP communicate this vision to both existing members of the CTPAT and the ISA programs as well as the potential members of the new enhanced Trusted Trader Program. Communication should include information on participation, eligibility, application processes, validation processes, reporting requirements, and incentives available to the Trade for participating in these programs.

Fourth Recommendation: COAC recommends that CBP publish a timeline for when they will extend the “Trusted Trader Program Test Incentives” as listed in the notice published in the Federal Register on June 16, 2014, to existing members of CTPAT and ISA.

Ms Boyce requested comments and discussion and received no response. The motion to approve the four recommendations was passed with no abstentions. Ms. Boyce then introduced and welcomed the new Director of CTPAT, Ms. Liz Schmelzinger.

Director Liz Schmelzinger provided the following report:

Trusted Trader Strategy:

The CBP strategic vision for Trusted Trader Program has expanded from the simple concept of participation in one or two programs to building a concept that quantifies measurable engagement of trading partners with their regulatory government partners, to the benefit of global trade and national/global security. The concept is simple, it is a continuum of activity; a consistent level of engagement between the trade and regulatory government partners that demonstrates the highest level of commitment in practice; to security, compliance, and partnership within the global supply chain. A trusted relationship that is articulated with trading and/or facilitative benefits, streamlining the global trading process, focusing global attention on those that pose the highest risk.

The development of the CBP Trusted Trader Program Strategy will consider global trading roles (importer, exporter, carrier, etc.), and be built with the foundation of national and international interoperability, demonstrating that a commitment to CBP’s Trusted Trader Programs will provide for global recognition. A key to the success of such a Trusted Traders strategy is the recognition that the program is scalable and attainable for all size traders, providing tangible acknowledgement through trading benefits.

The COAC Trusted Trader Subcommittee will work to co-create the CBP Trusted Trader Strategy within the next quarter in terms that acknowledge the significant commitment of partnership between government and trade in global trade and security.

Trusted Trader Pilot Update:

Work continues to complete Phase I of the Trusted Trader Pilot announced June 16, 2014 in Federal Register 79FN13992. CBP will conduct an evaluation of the pilot performance, results, identify lessons learned and best practices to ensure the continued development and success of the Trade Compliance Program within the CBP Trusted Trader Strategy.

After thanking Ms. Schmelzinger for her leadership, Ms. Latham said that several steps have been outlined so far include work to develop a Trusted Trader strategy, reviewing the results of the Phase 1 of the Trusted Trader Pilot Program, and working with the other subcommittees that include Trusted Trader concepts to incorporate those concepts into an overall Trusted Trader strategy.

Member Lisa Gelsomino gave kudos to Liz and her team for C-TPAT Portal 2.0 outreach, to which Liz replied with thanks to Lisa for her group's help in the past.

Maria Luisa Boyce said that questions and comments have been received regarding One U.S. Government and time may not allow for them to all be made, but she will read them later to acknowledge what the comments were.

Trade Enforcement and Revenue Collection Subcommittee

Co-Chair Lisa Gelsomino expressed her excitement at seeing all the screening at the New Orleans ports to crack down on the criminals. She said their recommendations are being held up by the Customs Re-Authorization Bill. She said they will have updates on the recommendation from the TERC Subcommittee on the mitigation guidelines for Food and Drug Administration (FDA) in light of the ACE deadlines. She said she will give an update on the working groups that have been established. The Antidumping and Countervailing Duty (AD/CVD) is a robust working group. She said all the recommendations from February 2015 have been implemented or are ongoing thanks to the cooperation from Wendy Frankel and Elisabeth Ufer from the Customs Liaison Unit of the Department of Commerce (DOC) and Alexander Amdur with CBP from XD Whittenburg's team. She said in the interest of time to check the COAC site for details. She announced an upcoming DOC webinar to help further outreach on AD/CVD. She reported that the Bond Working Group will be kicked off January 21st, to review the Bond Amount Directives. She added that there is some crossover help with the Pipeline Working Group to update 113 bond language and other initiatives.

Co-Chair Kevin Pinel reported that the IPR Working Group is working on a concept for self-regulation to be able to provide information to CBP to support targeting. He said he thinks the group needs to get more input from additional stakeholders outside of the working group for additional associations in order to have more complete information to be able to present to Customs as a solid recommendation.

Executive Director Cynthia Whittenburg said as they go forward she believes they will be touching the Bond Working Group and AD/CVD Working Group for risk-based and enhanced bonding. With respect to the Intellectual Property Rights Working Group, they are continuing to run the pilot on the voluntary abandonment and the express consignment environment. She said so far they have had over 3,000 interdictions through the process that has resulted in great savings to CBP. It has kept those goods

out of the commerce. She said they continue to assess the pilots and that there is some concern about sharing volunteer information rights group holders and the working group council. She said they are trying to determine how much can be shared with the rights holder. She said she is interested in separating out the other stream of work that needs to be addressed in terms of benefits to, those entities who don't feel they're at the level to undergo a full participation in ISA-like program but have a narrow type of importing scenario, repetitive shipments and how to facilitate the flow of those goods within that scenario.

CBP Executive Director Troy Riley said that the teams are monitoring the Re-authorization Bill for discrepancies and similarities. He said as soon as the bill is passed, they will become more active and present recommendations. Mr. Riley reported additional information regarding a discussion that was had about the mitigation capabilities between CBP and the other government agencies. He said they reached out and looked at some examples that were provided and that they have now asked for additional examples to determine if it is a localized communication issue or a procedural issue needing more information shared. He will have more to report in the future.

Ms. Boyce said that the trade enforcement piece is front and center as part of their trade strategy. She said that she can't comment on pending legislation and can only say there's a lot going on and a lot of discussion on how to do that trade enforcement.

Ms. Whittenburg said that they can't have effective trade facilitation without robust trade enforcement.

Ms. Boyce said that the last piece to be engaged in is the connection of the trade enforcement through the standards and work that is being done in the Centers. She said the plans for implementation within the Centers will change some of the conversations being had.

Global Supply Chain Subcommittee

Co-Chair Adam Salerno from the Global Supply Chain Subcommittee reported that the Pipeline Working Group (PWG) has brought together a strong group of industry experts and CBP stakeholders to address uniformity at ports of entry and automation procedures in modernizing regulations governing the movement of products through pipelines. He said that historically the lack of focused regulations for this industry created barriers to trade and administrative problems for CBP. The COAC has now developed the best approach to solve these issues for industry and CBP. He announced that in 2016 they will work with CBP to launch a pilot program next month. He said this pilot will leverage current industry practices to solve some of the longstanding issues that both CBP and industry share. He estimated it will take about six months to learn facts to increase the depth of CBP's knowledge of the industry. He

said he hopes this will lead to standardized reporting requirements of all ports of entry and regulatory modernization for all carriers.

CBP Director Jim Swanson added that the transit goods move through another country, through a pipeline system that's interconnected, and it's not as clearly defined as our borders are. He said this means they have to have a way to identify and not have to force other things that don't require entries. He said they are working to get them to look at these things in a different way that meets our needs to come up with a relatively quick and easy auditable process that says what amount of goods left the country and what amount of goods came back in. He said the process will all start on paper before attempting to become automated. The first task is to build the process.

Mr. Swanson said the second part is to leverage current automation to enforce a CBP ruling that talks about the requirement that goods be transited through the U.S. in in-bond shipments and they be required to be reported on a CBP 7512 in-bond form. He said they plan to get at least one of the pipeline operators up and running on an automated in-bond within the next couple months. He said this will be a natural gas industry firm which may have more volume and value than the petroleum industry.

He said the third part is they are finding all the gaps in regulations and working to overlay the gaps in regulations and working with Regulations and Rulings (ORR) to develop a regulatory package to move forward that adds regulatory language specific to the pipeline industry.

Ms. Boyce said this is one of the best practices work groups because they deal with experts where we have operations, headquarters, a center expertise -- all were pulled together in a work group to make certain they were looking at the different animals.

Liz Schmelzinger said her first official act as Director of CTPAT will be to request the Global Supply Chain Committee and CBP to formally request that the Subcommittee establish a working group to review and recommend updates to the CTPAT minimum security criteria. She said this requires updating to ensure criteria is reflective of current supply chain environment and the criteria is sufficient to secure those supply chains.

Director Schmelzinger read the following statement: CBP is formally requesting the COAC Global Supply Chain Subcommittee establish a working group(s) to review and recommend updates to the C-TPAT minimum security criteria, for each entity type. The minimum security criteria requires review and updating to ensure that the criteria is reflective of the current supply chain environment and critically important that the criteria is sufficient to secure those entity supply chains, considering the unique requirements of each entity type.

Co-Chair Brandon Fried said they would be happy to take on that task and they think it has tremendous value to make sure the program is effective. He said since it has been

seven years since minimum security has been looked at, that it is time to do it again. He said it's time for the new director to put her mark on the program and take it to the next level.

Executive Assistant Commissioner Owen said he would add that it is important to get the right companies on board

Trade Efficiency Survey Update

COAC Lead Mike White said he will start because he has a flight to catch. He said they see four things that should always be looked at in a survey. He said answers should be uncovered in a non-intimidating environment; discussion and opportunities of important key topics should be discussed; decisions should be made based on objective information; and an unbiased approach should be used without basing decisions on gut feelings. He said in the last survey they are seeking increased participation as well as completion.

He said one of the biggest issues was that the survey was long. The number of questions has increased from 45 to 50 to 84 questions. They want to streamline it more. He said they plan to target the audience to respond who are best capable of answering the questions.

Ms. Boyce thanked Mr. White and Celeste Catano because they volunteered for this survey. Ms. Boyce said she lost her questions from the public on the Single Window, but she wanted to make sure everyone knew questions were received. She listed the people who submitted questions as follows: Heather Connor from Ativa in Syracuse; Mandy Burkhardt, Shana Head, Anna Rushing, Mel C. Wilson, Christopher Smith, and Lang Won (all phonetic).

Closing Remarks by Commissioner Kerlikowske

The Commissioner thanked everyone from New Orleans, CBP, and the town for their hospitality.

Time Skud thanked everyone for a terrific meeting and said he looks forward to the next meeting and the next set of work that this committee reports on.

Maria Luisa Boyce adjourned the meeting at 4:40 p.m.

2016 Advisory Committee on Commercial Operations to U.S. Customs and Border Protection (COAC) Acronyms, Abbreviations and Definitions

COAC Acronyms & Abbreviations

COAC Acronym	Definition
1USG	One U.S. Government Subcommittee, COAC
AAEI	American Association of Exporters and Importers
ABI	Automated Broker Interface
ABO	ACE Business Office
AC	Assistant Commissioner, CBP
ACAS	Air Cargo Advance Screening
ACE	Automated Commercial Environment
ACH	Automated Clearinghouse (debit/credit)
ACS	Automated Commercial System

COAC Acronym	Definition
ACSCC	Advisory Committee on Supply Chain Competiveness - Department of Commerce
AD/CVD	Antidumping/Countervailing Duty
AEO	Authorized Economic Operator
AES	Automated Export System
AESTIR	Automated Export System Trade Interface Requirements
AMS	Agricultural Marketing Service, USDA
AMS	Automated Manifest System (air & ocean)
APHIS	Animal and Plant Health Inspection Service, USDA
API	American Petroleum Industry
AS	Assistant Secretary, CBP, DHS. Treasury
ATF	Bureau of Alcohol, Tobacco, Firearms and Explosives
B	
BOL	Bill of Lading
BIEC	Border Interagency Executive Council
BIEC EEC	Border Interagency Executive Council External Engagement Committee
BIS	Bureau of Industry and Security, Department of Commerce
BRIC	Brazil, Russia, India & China
C	
CATAIR	CBP and Trade Automated Interface Requirements
CBP	U.S. Customs and Border Protection, Department of Homeland Security
CBPO	U.S. Customs and Border Protection Officer
CBSA	Canada Border Services Agency
CDC	Center for Disease Control and Prevention, HHS
CEE/Center	CBP Center of Excellence and Expertise
Census	U.S. Bureau of Census, Department of Commerce
CES	Container Examination Station
CFR	Code of Federal Regulations
CCL	Commerce Control List
CCS	Cargo and Conveyance Security
CFO	Chief Financial Officer
CFS	Container Freight Station
CIT	Court of International Trade
CMO	DHS Committee Management Office
COAC	Advisory Committee on Commercial Operations to U.S. Customs and Border Protection
CPSC	Consumer Product Safety Commission
CSMS	Cargo Systems Messaging Service
C-TPAT	Customs Trade Partnership Against Terrorism
D	
DAC	Deputy Assistant Commissioner, CBP
DAS	Deputy Assistant Secretary, DHS - Treasury

COAC Acronym	Definition
DDTC	Directorate of Defense Trade Controls, Department of State
DEA	Drug Enforcement Agency
DHS	Department of Homeland Security
DOC	Department of Commerce
DOE	Department of Energy
DOJ	Department of Justice
DOT	Department of Transportation
DUNS	Data Universal Numbering System (Duns & Bradstreet)
E	
EAA	Express Association of America
E&C	Enforcement & Compliance, Department of Commerce
EAR	Export Administration Regulations
ECCN	Export Control Classification Number (BIS, Commerce)
EDI	Electronic Data Interchange
EI	Electronic Export Information
EIN	Employer Identification Number
EPA	Environmental Protection Agency
Exports	Export Subcommittee, COAC
F	
FACA	Federal Advisory Committee Act
FAQs	Frequently Asked Questions
FCC	Federal Communications Commission
FDA	Food and Drug Administration, HHS
FMC	Federal Maritime Commission
FRN	Federal Register Notice
FSIS	Food Safety and Inspection Service, USDA
FTA	Free Trade Agreement
FTR	Foreign Trade Regulations, Census
FTZ	Foreign Trade Zone
FWS	Fish & Wildlife Service, Department of Interior (DOI)
G	
GSC	Global Supply Chain Subcommittee, COAC
GO	Government Order
H	
HAZMAT	Hazardous Material
HHS	Department of Health & Human Services
HLED	High Level Economic Dialogue
HTS	Harmonized Tariff Schedule
I	
IATA	International Air Transport Association
ICE	Immigration and Customs Enforcement, DHS
ICE/HSI	Immigration and Customs Enforcement Homeland Security Investigations,

COAC Acronym	Definition
	DHS
I.E.	Immediate Exportation - type of in-bond
IGs	Implementation Guidelines
INA	International Affairs, CBP
IOR	Importer of Record
IPR	Intellectual Property Rights
IRS Number	Internal Revenue Service Number
ISA	Importer Self-Assessment
ISF	Importer Security Filing
IT	Information Technology
I.T.	Immediate Transportation - type of in-bond
ITA	International Trade Administration
ITC	U.S. International Trade Commission
ITDS	International Trade Data System
M	
MarAD	Maritime Administration, Department of Transportation
MID	Manufacture Identification
Mod Act	Customs Modernization Act
MOT	Method of Transportation
MPF	Merchandise Processing Fee
MRA	Mutual Recognition Arrangement
N	
NAFTZ	National Association of Foreign Trade Zones
NASW	North America Single Window
NCBFAA	National Customs Brokers and Forwarders Association of America
NGO	Non-Governmental Organization
NHTSA	National Highway Transportation Safety Administration
NMFS	National Marine Fisheries Service, DOC
NPRM	Notice of Proposed Rule Making
NRC	Nuclear Regulatory Commission
NVOCC	Non-Vessel-Operating Common Carrier
O	
OA	Office of Administration, CBP
OEM	Original Equipment Manufacturer
OFAC	Office of Foreign Assets Control, Department of Treasury
OFO	Office of Field Operations, CBP
OGA	Other Government Agency
OMB	Office of Management and Budget
OPA	Office of Public Affairs, CBP
OR&R	Office of Regulations and Rulings, CBP
OT	Office of International Trade, CBP
OTEXA	Office of Textiles and Apparel

COAC Acronym	Definition
OTIs	Ocean Transportation Intermediaries
OTR	Office of Trade Relations, CBP
P	
PGA	Partner Government Agency
PIC	Product Identification Code
POE	Port of Entry/Export
R	
ROTB	Role of the Broker
RLF	Remote Location Filing
S	
SAFE	Secure and Facilitate Global Trade (SAFE Framework of Standards)
SBA	United States Small Business Administration
SCAC	Standard Carrier Alpha Code
SME	Subject Matter Expert, CBP
SME	Small and Medium Size Enterprise
SOW	Statement of Work
SRN	Shipment Reference Number
SSN	Social Security Number
SW	Single Window
T	
T&E	Transportation and Exportation - type of in-bond
TERC	Trade Enforcement and Revenue Collection Subcommittee, COAC
TFA	Trade Facilitation Agreement
TIB	Temporary Import Bond
TM	Trade Modernization Subcommittee, COAC
TPP	Trans-Pacific Partnership
Treasury	U.S. Department of Treasury
TSA	Transportation Security Administration, DHS
TSN	Trade Support Network
TT	Trusted Trader Subcommittee, COAC
TTB	Alcohol and Tobacco Tax and Trade Bureau
T-TIP	Transatlantic Trade & Investment Partnership
U	
USACE	United States Army Corps of Engineers (Corps)
USAID	United States Agency for International Development
USCG	United States Coast Guard, DHS
USCIB	U.S. Council for International Business
USDA	United States Department of Agriculture
USML	United States Munitions List
USPPI	United States Principal Party in Interest (Exporter)
USTR	United States Trade Representative

COAC Acronym	Definition
V	
VIN	Vehicle Identification Number
VOCC	Vessel-Operating Common Carrier
W	
WCO	World Customs Organization
WG	COAC Working Group
WTO	World Trade Organization
WTO-TFA	World Trade Organization - Trade Facilitation Agreement
X	
XD	Executive Director, CBP