

Drawback Technical Webinar, August 9 - Transcript

>> We will get going in just a minute or two. Thanks everyone. >> Good afternoon everyone. This is Brian Lewandowski with the ace business office. We're going to be going over the technical aspects of the drawback CATAIR and deployment of drawback on October 1 today and will certainly be available to answer questions. A little bit later I hope to have one of the developers here with us as well to go over any very specific technical questions that you have the certainly we can walk through the tran -- CATAIR. The first thing I'm going to do and we should have the CATAIR posted. Do we have it here but it

[Indiscernible - low volume]

I believe everyone should have a copy of the CATAIR themselves. Have my own copy here. As is going through a couple of revisions since we first posted it back in January but a lot of the revisions were language or specifics about the field. The general structure of what we are can for in the ABI transmission should still be consistent from that time up until about now. So, a couple of things I will cover if we can go to page 9 of the CATAIR. We will try to bring that up on the screen. What that covers is the structure map for a transmission for drawback in ace. The first thing I want you guys to be aware of is the intro types. We are consolidating all of those from the existing five or six different types that we have now into one single type XLVII. That is one change in how we are taking in a drawback claim. The claim will also have a provision field in the belief that is [Indiscernible] record. So the drawback provision is in the 10 Mac record and that is in positions 34 and 35. There is an appendix that list out the 20+ different drawback provisions. That's what we're going to be using to run validations on the data that you send us that as part of a claim. Be aware of those two changes. 47 and the use of a provision using the codes that are listed in the appendix. Really quickly to kind of go through what's in here -- and what we are looking for a drawback claim -- the 10 record is the header for the drawback claim so basic information about the claim itself any privileges you are claiming etc. so basic information about the claim itself any privileges you are claiming etc. 31 is where the bond information goes. This is if you are claiming accelerated payment or requesting Excelerator payment.

The 40 record is the imports grouping and then there are places in there for different HTS numbers quantities unit of measure in the revenue being requested. Early on we had line number is a required field in here for the underlying entry summary line number was a required field. We have since relaxed that based on feedback from the trade. That program name has been completed on our side and has been deployed to serve over the weekend. We do need to get ACS MS message out stating that that has been deployed in it should be available for testing at this point in time.

Outside of the 43 record -- actually, thing to point out in the 43 record -- some of you have asked about the action indicator. This basically tells us you are trying to do with the goods or what has been done with the goods that were imported. So this will drive whether we are looking for data in the 50 record which is manufacturing and what we are looking for in the 60 record which is the export destroy section. The action indicators really just there to tell us what to expect further in the data field. Based on the activities that were performed on the imported goods or how they work manufactured -- what was extremely etc. 50 record -- is where we have the manufactured articles and all the data associated with that. In the ace environment, we no longer need the certificates of manufacturing because we are now collecting this is data in the 50 record. The 60 record is where we have the export information or the destruction information and included in their we also have bill of lading, believe lading number if you know that that can be included in their. It does not link the [Indiscernible] at this point in time but there are some discussions about how we might be able to use that and we are talking at a business office -- the business office is talking with the trade network and how we can use that blue planet -- bill of lading number best going for.

There are a couple of remaining blocks -- there is the notice of intent field in the structure map this is mandatory -- optional [Indiscernible] with that one is intended to do is to serve as the portion of the 75 to do is to serve as the portion of the 7553 form that indicates that there is a notice of intent to export or destroy and we are willing to take a yes, no type of indicator as a declaration that you have a valid one. And that document can actually be submitted via [Indiscernible]. Policy will be issuing some instruction on how that will work and what is acceptable and what is it. Hopefully that will simplify that piece of the process for everyone.

Then lastly there's the NAFTA grouping that one is what is conditional I believe we are updating that too optional. I'm just going to touch base with the team -- I think that is just that typo. When you've got a NAFTA or claim involving NAFTA there some tariff information that we would like to collect to be able to purport to our younger parts in Canada or Mexico -- that is an optional block as well.

That's a basic rundown of what is in the claim itself or what we are looking for all of this information is based off of what is on the 7551, 7552, and 7553 forms. So that's a quick overview. I'm happy to walk through any of the areas of the CATAIR will discuss any questions. I know that there will probably be some process and business-related questions today but I believe -- I can touch almost to the extent that I can but we do have a separate webinar set up for that one later this week.

[Indiscernible - low volume]

Okay. Great.

This is conference call do you have a current drawback -- the new drawback scenario or conversion so that we can kind of see what we currently have and how we would map these new fields to the existing?

We don't have anything like that. Again all of the fields that are on here are things that are taken from the existing forms. The current process in ACS is really said with the header and the underlying entry summary numbers and then everything else is submitted via paper or various supporting electronic documents and Excel spreadsheet databases and whatnot. This is off the information that a drawback specialist gets in some way shape or form to support the claim. But all of this should map to what is on those forms.

Okay a software vendors we only can see the part that we provide -- don't know what spreadsheets they might or might not give you guys to.

Yes, all of the -- with the exception of the line number and we have discussed that, everything that is here is something that is submitted as part of a valid claim to CBP.

Okay.

Hello this is Ray [Indiscernible]. I'm wondering about the ability to test drawback since currently you cannot test a seat -- ace drawback while provisions are being made so we can test drawback for ace Québec

That is in the [Indiscernible] environment right now. We have had that in the [Indiscernible] environment for the last couple of months and the update that we pushed out I believe over the weekend includes the relaxing of the underlying entry summary line number that was requested by trade. What we have in [Indiscernible] is pretty much what we're going to be deploying but that can be tested right now. Maybe what I can suggest and we're going to have some discussions on the business side about what kind of structured testing we need to do -- if we need to make arrangements for that and we will push some information about that if we go down that road. But at the same time in the CERT environment you should be able to submit entry summaries in the CERT environment and did submit a drawback claim against those entry summaries. >>Okay. Hopes up. Because I get nothing for ACS and that's in CERT I think .

[Indiscernible - multiple speakers]

I miss the question. >>I'm just saying that ACS is in CERT and I couldn't get anything back for ACS drawback. Also what happens in ace. Hopefully it will work because [Indiscernible] trying to do ACS testing.

Has anyone on the call cut anything back with ace. I've worked with my client Representative and he is not seeing my ace file back drawings in CERT. >> I can touch base with the client Representative team in the development team here and make sure that if data is being submitted in CERT that we are seeing it or determine if there is some other type of issue going on. But what I can say is with had it deployed in CERT cents June -- since June or that timeframe and we put the update out over the weekend to include the relaxing of the line number requirement. What is in CERT now should reflect what is in the CATAIR that we published as of June. What is in CERT now should reflect what is in the CATAIR that we published as of June 2016.

Enough there's any from the call who has actually received a response back since gene?

-- June?

Anyone on the call please chime in with the

--?

Can anyone give us the [Indiscernible] code because we can look that way as well.

FB 1512. >>I filed one in CERT today.

We will have the development team take a look at that and see what we can find.

Thank you.

Any other questions? >> Just a reminder that if you have any questions you will need to unmute your phones by pressing*6. We will give it just a few more seconds.

Height this is Matt with Roanoke. You talked about the entry number changing to -- I'm sorry the entry type changing to 47 for these. With that only occur in ace and 41 through 46 is only in ACS?

We will be taking drawback claims only in ace following October 1. The 47 type is exclusive to ace the following October 1 that will be the only way you can file drawback claims. >> Okay.

Will be migrating over all the all claims from ACS that are still open in any underlying information that we need associated with those -- there's a big data migration effort that is occurring to make sure that that happens. Everything is going to be converted over into the ace environment.

So the conversion will change the entry types?

The conversion will change the entry types will we bring those over into the ace environment.

What you see 47 -- is that just internal?

That lost -- not listed in the transit's -- CATAIR [Indiscernible - low volume]

I was asking because there is some T-bond -- E bonds implications on it. We send the provision not the drawback type.

Correct. And apart because after talking with various parties both internal and external, it is the provision that was the thing that they were validating against in trying to determine the sufficiency of the claim. The entry type was categorized but it didn't really impact ultimately [Indiscernible]

It shows no more entry type. Dishes the provision.

[Indiscernible]

Where are we ever going to see entries by 47?

[Indiscernible - low volume]

So when they submit ABI there is no field [Indiscernible] 47. Because it's a drawback -- in essence because it is a drawback submission when you send us the PE it is treated as a type XLVII by the system.

Okay. So we don't send it, Whittlesey this is -- we don't see it.

Internally when we look at this on the user interface will see that it is type XLVII so that our users know how to [Indiscernible] drawback claim. They are just looking at the [Indiscernible - multiple speakers]

Tell that to the filers because they were not know what you're talking about.

To the extent that you do not have to [Indiscernible] single entry type tranIX -- that's what we are aiming to do with this.

You said entry number -- you meant entry type?

Yes intertie

-- Entry type.

[Indiscernible - multiple speakers]

That makes sense.

This is Tammy at Rogers and Brown. Do you have examples are samples out there of what we are supposed to send or we -- do we just use our own data in contact our CDC Representative [Indiscernible - multiple speakers]

Use your own data. We don't have any examples of what not. Actually, I don't believe that we have any examples that we have to publish or share for you to use but as I said the first step if you are testing in the CERT environment I would say is submit some entry summaries and then submit a claim against them. That'll have to be complex -- they can be simple straightforward ones to start but I think that would be your first step.

Okay. Thank you.

I have a question -- in the 40 record it says that the entry numbers must be listed in chronological order. Is that validated against when they are originally accepted by customs or what criteria are you using?

Let me take a look at that. >> I think the chronological order was perhaps a carryover from the original ACS CATAIR. I don't believe that that is going to have any impact or effect as far as an ace claim goes. We can do is we can maybe just -- thank you for pointing that out. We can confirm that one for sure with the technical team and provide an answer back on Matt. -- That. And then update the CATAIR is needed.

You said this covers three different type of drawback forms, it may be helpful if you had examples -- the matrix with the record layout for the three different simple scenarios.

That's potentially something -- there are going to be some guidance coming out from the business office. One thing I will say is that the CATAIR, we been trying to keep it as much as possible simply a technical document saying this is what we will expect for data and what we expect when data is sent to us. There is -- policy guidance and business rules and process documents related specifically to drawback I have to be issued to cover that. What you've suggested is something I can suggest to the business office that the include

based on the forms that would normally be submitted and paper.

That will be helpful.

Is a software vendor we don't really see what they are doing all the time we can just see these technical guidelines and we have to marry the two together.

Totally understood.

Other questions and again*six to take your phone off of mute.

I have a question -- Andrew from [Indiscernible]. Looking at the import grouping if I'm reading this correctly -- okay the 40 we list each entry summary and then you have up to 8 41 8 4142's and the [Indiscernible] does that mean we're limited to date -- 8 HTS numbers?

That is representing the -- you can claim the import entry as many times as you need to in the HTS grouping is there basically reflecting the same kind of HTS that you would have on a given entry line. I think -- this is sort of the, ultimately what we want to do is to be able to tie the importation that you were siding back to a specific line but you can report that entry number is many times as you need to in the HTS numbers as many times as you need to. The H grouping is there because on a given line in the summer you can submit up to H -- 8 HTS numbers. Typically the most we will see this two or three -- to if it has some 90 AR 99 provision or if it's a set like watches or something of that nature where you would have three HTS. Typically it will be one that you can submit up to 8 if you want to.

Okay also on the 43 records, I see accounting class codes. Then there's the [Indiscernible] have the same description -- is that an error?

364, 369 I see that in the CATAIR now. Give me one second to take a look at this. >> That looks like a typo. The 369 should be Puerto Rico drawback duty so it may have just gotten cut out of the table when we publish this. Will update that one as well.

Okay.

I think at this point in time when I say we're going to update this stuff, we really don't want to make dramatic updates to this but I think these typo and heirs we will certainly address and correct but structurally this is what the drawback claim is going to look like but certainly things like that that do not make sense -- this is certainly a typo.

What page was that on?

23 in the 43 block. Is the accounting class codes. 364 and 369 posts a drawback duty. 369 just say Puerto Rico drawback duty.

Thank you.

One more question. On the 50 record, there are other records that require the city and state -- is there any particular format you would like that to Ben?

-- Be in? >> Are you talking about the factory location field?

Current.

Policy guidance would indicate what is acceptable there. The question that came up was how to reported if there are multiple factory locations involved and I believe that the policy guidance is going to allow multi-or various. That will be driven by policy guidance. Is not anything that we are enforcing as part of a data validation in CATAIR because there can be so many variations on how to report city, state, location profits anything like that. Policy guidance will determine what needs to be put in their.

Okay. >> Do we have other questions and begin this press*six to take your phone off meet. -- Mute.
>>We have not been able to do the CERT does that mean that we need to be an ace for other reasons. We are purely drawback specialist's.

Are you a ace EDI certified file or -- file or?

Yes. >>In that case you probably should be talking to your client Representative to determine or to get access to the CERT environment pick there are no restrictions to getting into that and it's intended for developers and filers to test.I would safer step would be to reach out to your client Representative .

Okay. Thank you.

[Indiscernible]

What would be the condition for the 50 and 51 group?

The 50 and 51 grouping -- that is for the manufacturing. Generally that's going to be in the 40 record when you report your action indicator in the 40 record. And you've got manufactured or anything of that nature. Manufactured or transfer -- that is where it you will report data in the 50 record.

So which codes here would make the 50 record -- 50 grouping and a Tory? --?

So, is going to be X and T. >> Like as a software developer things like that -- that will be helpful if it was listed in the preface to the document or prior to the 50 group or 50 record -- it would help.

I think that is maybe something we can indicate

somewhere in the CATAIR. Again we will make some tweaks and adjustments based on this call. We have a business called later this week and some other discussions during the week . [Indiscernible - multiple speakers]

So if you have some of the rules that were in this guideline -- I know this is technical put that will be a technical thing when you have this, then do that. Then at least that could correlate with the business role and we could see what they are referring to. We can have these conditions, we know obviously [

Indiscernible] then you would only send certain things and that is the condition but when you have condition we don't know necessarily with the other conditions might be.

Right.

I think we can do that and I'm sure we will get some work feedback letter in the week as well suck probably what I would say is we will try to have a CATAIR update out sometime next week because I know people are counting on this and looking for this so we will try to get this [Indiscernible] in some appropriate place.

This is a great [Indiscernible] again. I just sent in this drawback in the get nothing back.

Okay. >>Last time I did this my clan Representative totally screwed up my configuration and all kinds of other stuff would not work. Somebody needs to determine why the stuff is not coming back and informed all the client reps so we can get this fixed for everyone who wants [Indiscernible]

Once we get off the call here, we're going to touch base with the development team and try to determine what is going on.

Okay. Thank you.

Do we have other questions? >>Hello guys this is [Indiscernible] just a quick question -- we were talking about the factory location and right now it's a pretext waiting for policy guidance. Which you then - after the policy guidance is given would you update in the CATAIR to help us with the development [Indiscernible] because I think it is important that we either [Indiscernible] that we know about it to be able to code and validate against it especially if you are saying it is a multiple [Indiscernible] and allow multiple records. [Indiscernible] it is important to know.

There are some fields in here that are out for numeric and are intended to [Indiscernible] free-form text simply because they are going to be policy guidelines and different structures that can be submitted there. So things like the factory location or the article description text -- a lot of that is going to be driven by what policy requires at that time. [Indiscernible - multiple speakers]

So you're saying that CBP won't validated against that at all?

[Indiscernible - multiple speakers]

HDS numbers, duty, entry numbers, dates things of that nature we're using validating both format and the accuracy of the dating such as making sure it is a real entry number. [Indiscernible - multiple speakers]

Factory location can be anything that needs to be put there according to policy.

Okay. From our perspective [Indiscernible] as a pretext in the client can enter -- free text in the client can enter what they want.

What comes into ABI there won't the -- be a [Indiscernible]

Is being supplied because it's required by the form. And at the same time there is a reference for the drawback specialist who is reviewing and refunding the duty but it is not a data feel that we are going to validate just in terms of [Indiscernible]

Thank you.

Other questions? >> Again please take your phone off meet by pressing star 6 .

Is been from CBP -- the protest program went on to the portal are there plans for the drawback to do the same?

At this point in time know, -- no were taking our lead from the entry summary side of things so right now the ace portal cannot be used to add in an entry summary by the trade so you can't do that directly via the portal. Is not to say that that will happen at some future date but I think for purposes of filing a claim at this point in time it strictly a CBP function to use the portal for that.

Okay.

Other questions?

This is Andrew from [Indiscernible] again this is probably a typo on the 31 record the single transaction on the amounts -- bond amounts -- amount in US dollars but further down it states to decimal places assumed. I'm assuming there is no decimal places -- these are just whole dollars?

What position? Single transaction bond amount?

Give me one second here to take a look at this. >> Andrew I'm sorry, can you just walk me through that one -- I'm not seeing what were looking at here.

While the description says is to be coverage amount in whole US dollars --

Oh I get it. Whole US dollars to decimal places assumed. Your basically asking if you are reporting in a whole number why would we have to put 00 on the end?

That's a very good question. Will take a look at that one and get back to you on that. [laughter]

I'm sorry I'm just laughing at that because you are absolutely right.

Totally understood. We will get back to you on that one.

Thanks.

I have another question about the dollar amount. I know that for some fields it says you can send [Indiscernible] followed by a numeric digit. Of two decimal places are implied is a single zero okay or do you need to send three zeros?

Single zero would be okay in that scenario.

And with three zeros project or three zeros would also be acceptable to the

Both would be acceptable.

Okay -- thank you.

Did you just explain the method of the description on page 18 440 record -- for 40 record -- what does that mean?

Can you repeat that? What record with the

On the 40 record on page 19 where it says filler. The description just caught my. -- I.

Positions for to five.

Space field until expended linked fully supported. Reserved filler for future expense and of the line item identifier when fully ace compatible .

So I just had our technical lead here just explain to me that it is actually carried -- is mimicking what is in the AE in the event that we have to have future expansion so that we can at least stay consistent with the entry number. In the event that in the future the entry number expands with got to extra characters we can use in that is standard with the AE entry number in CATAIR as well. There should be a filler block there in the event that we need to [Indiscernible - multiple speakers]

So you would have to rearrange those to get the entry number [Indiscernible] positions .

This is set up exactly the same way. It's basically -- is not used right now [Indiscernible - multiple speakers]

I understand that but if you're going to use it for the entry number going forward to going to have to rearrange the record to get it to be at the end of the entry number -- I thought you might want to do that before [Indiscernible - multiple speakers]

I think the for and five this for the entry file or code in the filler before the entry number is for the entry number. I think there are two fillers their -- one for entry file or code and one for the entry number. At least that's what I'm thinking.

I agree if you are thinking that positions four and five is for the entry number then [Indiscernible] realigning to do.

[Indiscernible - multiple speakers]

I think I'm mixing -- is the same concept. Four and five is for the file a code and non-attendance for the entry code [Indiscernible - multiple speakers]

I wanted to make sure that if you are going to be doing something like that you may want to rethink the record layout before you go ahead and put it in production.

Think what we did is we copied exactly within the AE for entry summary and I can just take a look at that later and confirm that. To the extent that we don't want to realign stuff for something that may never actually get used for now is just the to pace -- to place filler [Indiscernible] [Indiscernible - multiple speakers]

I get it. I get it.

We live in an imperfect world but we do our best.

All I was saying is that if you're going to use positions four and five with the entry number that is in 11 to 18 you might want to think about rearranging the record layout now as opposed to putting into production in the doing it later and then have in the [Indiscernible] change for record 40 but I see there are two fillers. I think the description is just a little bit messed up.

I've a question about the 64 record -- the duty paid to foreign government in local currency. It is not specified to decimal places. Is that whole dollar or two decimal?

It should be to decimals -- two decimals.

For duty paid in local currency. Yes, it should be to -- two decimals. Just give me one moment here. >>
So the last two digits will be decimals. So if we need to add a clear fact Tatian -- clarification to that description we can do that. >> Do we have other questions?

Alright, going once, going twice, aren't. -- All right.

Thanks everyone for dialing in today. Again we have the business webinar on Thursday and I will turn it over to Frank to close things out for us here.

[Indiscernible - low volume] We have the drawback business and policy webinar on Thursday, August 11 at 12 back 30. -- 12:30 we're going to put an updated schedule out [Indiscernible] schedule for the business webinar and other than that we will have our next [Indiscernible] call on August 16 and that is [Indiscernible - low volume] . With that, we will see you at the next call.

Thank you everyone. >>

(Event concluded.)