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Good morning, everyone. Welcome to the CBP quota webinar. We are going to be offering this as a re-recording of Tuesday's webinar to accommodate folks who had difficulty hearing which I think was the vast majority of you due to feedback issues. We appreciate the folks that were on the call on Tuesday and for those looking at this archived version we hope this clarifies a number of issues for you.

My name is Brian Lewandowski and I am with the ACE business office and working on the development and deployment of CBP quota. We also have John Raymer from CBP's trade policy and program office who manages the quota process for CBP. Today we have a pretty full agenda. Quickly and introduction of what is quota in ACE? Single window implementation via ACE and the timeline for the upcoming deployments. Benefits of quota in ACE. The quota transition plan as we approach July 23 and things on the trade side and things on the CBP side. Primary changes to code. Filing certified from summary. Determining presentation day. Filing of 01 versus 02. Rules of opening moment filing and reallocation review and have opening moment is going to work. We are going to talk about policy resources available. available. Quota reports and CATAIR updates and any final comments and Q&A. Since this is a real recording were going to utilize the list of questions that came in during the original webinar on Tuesday. We are going to jump writing. This is a quick look at the timeline for deployment. For those of you that have been involved with us in the room to deploying ACE fully, we have had a number of key milestones achieved already said this timeline shows some of those things. The next big one coming up, July 23, 2016. The things we have deploying, quota entry types, warehouse and warehouse withdrawal. Those are the remaining entry types we need to deploy to fully get all of the important transactions from ACS over into ACE. We also have other things deploying at this time. We have got eCERT which has a relationship to quota. We have got a few other miscellaneous parts deploying on July 23. According to the schedule, August 27, we have got protest supply and a number of changes there. October 1st, we have got all of the remaining -- includes statement collections, drawback recon and various miscellaneous things including a full updated [Indiscernible]. I appreciate everyone in their support in getting us through this point. July 23 is a big date. Were going to cover some of the benefits of quota in ACE. The first thing is our goal is to automate as much of the process as possible. Recognizing today's process is a very manual paper-based process across multiple time zones and multiple parties. Cross communication via different methods. Report and notice is, phone calls and letters and all things just to make the quota process work and ensure it is as accurate as possible. That said, in the ACE environment our intent is to automate as much of that as possible. The way we are accomplishing this is by utilizing the existing summary data. We are not asking for anything additional. We take the information when it is filed with us and validated against quota master records. Every line that comes in both get validated to ensure the country and tariff combinations and entry type are appropriate for quota or not. You will get messaging back letting you know. If it is subject to quota and you file it as a 01, you will get a message back. Just letting you know what you have to do and your

status. I'm going to save roughly we are anticipating over 90% of all quotas will be automated. When you transmit your entry summary dated to us, we picked that up and send you messages back. When the system allocates its, you will get messages back. The remaining portions we did not or can't automate usually involve things where there is a protest involved, some type of special service request such as an allotment transfer you might need. Different types of timing issues. Special complex quota scenarios that might involve human intervention and we also have Tuna which is another big one. Those of you filing Tuna, you file at the started the year and later in the year we know with the low rate quota is supposed to be and those get manually adjusted. The same situation will occur in ACE. That is something we can't automate simply because we don't know what the quota is going to be an after-the-fact we have to reprocess those manually. I think we will have some streamlining and enhancements they are. Those are really the benefits in ACE. Our hope is most quotas that everything goes smoothly and does not require human intervention. You get your messaging back. Please make sure you were checking CATAIR an updated your system for the message responses because that is how we're going to inform you of your final allocation status and if there is a proration involved because the quota is opening moment are at threshold. That is that you will get your notification back.

The quota transition plan. Deployment is going to be on July 23. Leading after that, we have basically got to start slowing down the ACS process and getting things staged so we can migrate the data over into ACE and basically switching from one train leaned to another train that is moving. On Wednesday the 20th, that will be the last day for trade to submit non-ABI quota transactions. Friday the 22nd will be the last day for trade to submit ABI quota transactions. Saturday the 23rd is when we are migrating everything over and when we are cutting over to ACE. After that you can start filing in ACE with quota entry types and warehouse withdrawals. Monday through Friday the 25th through the 29th that is when we will look at anything that wasn't handled in the ACS environment that needs to be allocated in ACE manually. We are going to clean those things up. At that point anything new coming into ACE should be part of this automated process. There will probably be further guidance for specific coming out related to this transition plan. That is the rough overview. A couple of notes. The commodity graph report, that only comes out on Mondays. Because of the cut over, that when is going to be issued on Friday July 22nd. That is for your awareness if you're utilizing that report. The other thing is opening moments coming up. The next major opening moment is October 3rd, 2016. That is going to be for Sugar. January 2nd, 2017 is for Tuna get we have basically got about a three-month window for three month window for everyone to get used to quota in ACE and how it works and how the messaging works and the automation of the process before we hit an opening moment. We have been doing opening moment testing in the certification environment. I think it has been educational for us in CBP as well as the trade participating in that. We are going to continue that testing in the certification environment for the next three months prior to the Sugar opening moment. If anyone would like to participate in that, you can send it e-mail message to me, Brian Lewandowski.

If you are a file or you can reach out to your client wrap and let them know you want to participate in the quota opening moment certification testing. Likewise, the deployment of quota is going to be for USDA quotas as well so USDA import licenses. If you want to test that in the certification environment prior to the 23rd, you can still do that and again reach out to me or your client wrap. We will set you up with a testing license for USDA purposes in the certification environment so you can basically test against it at will but we do have to set up that license for you. That is about it for the transition plan. Again, high level. We still have time before October 3rd. We encourage you to participate in certain testing. We do believe once everything gets used to this following deployments, it should alleviate a lot of the concerns about how this is going to work.

A couple of changes in terms of how you have to file. Because we are not requiring paper any longer, you do not have to timestamp. It is unnecessary in the ACE environment. We are strictly using data. Therefore when you are filing, and you will be filing quota certified from summary. If you have a cargo release involved, you will file your entry summary and cargo data simultaneously as certified from summary. This is for cargo conception entries the warehouse withdrawals, you would simply file a warehouse withdrawal. There is no cargo involved in that point. When you file certified from summary, the cargo data will be processed independently of the summary data so that weight if you have issues, we are going to process your summary and your cargo data -- if there is any reject that occurs in cargo at that point the transmission of the cargo data, we still have your summary and as long as that is good we will continue to process your quota. Certified from summary insurers eligibility when cargo is involved. You simply do the warehouse withdrawal. You cannot file a cargo entry as quota without certified from summary. Just be aware of that. Warehouse withdrawals again, and last bullet, our summary only cargo entry do not need to be certified from summary. No time stamping is necessary. No bringing of people to the port. It is pretty much -- we will get it to the right places and run it through validation if it is subject to quota. And as reprocess you will get messaging as well.

Determining presentation date. There are two paths. One where cargo is involved and one where warehouse withdrawal is involved. When cargo is involved in your filing certified from summary, we have three elements we are looking at from the presentation date. The arrival of goods, whatever the date and timestamp time stamp is. Looking at the date of entry summary, the day you transmit data to us. We are also looking at the date which the entry summary was paid or the date upon which was scheduled to be paid on a future date. Just to clarify that, if it is Monday and you were going to be paying on Thursday, we are going to be looking at Monday as the date you scheduled that future payment date. We are going to be using Monday as your date, not Thursday. In your case whether it is arrival of goods or data entry summary and the date it was paid or the date it was scheduled to be paid at a future time, we are going to be using the latter of those three dates as the presentation date. For warehouse, there is no arrival involved. Just the date the entry summary was transmitted to us. As well as the dates which again it is paid or it is scheduled to be paid on a future date.

If we need to clarify this further, we can do that. During the original webinar we had questions on this but the date it was paid or upon the date you schedule you want to pay.

01 versus 02 when a quota has spilled. This is also an operational change in terms of what you need to do. When you are filing quota, you are filing a quota entry type. When that quota has spilled, the prototype is no longer subject to quota in you are using a different tariff number at a higher rate of duty. Because it is no longer subject to quota you don't have to file that as a quota entry type. You can file it as a normal consumption entry type. A 01, 11 or 03 or whatever the circumstances are. That said maybe it is because we don't need you to file it certified from summary. It can be a normal consumption transaction at that time because the quota has filled. You don't have to timestamp anything. We don't need to process it through the quota system, it is simply a consumption entry. That should be an enhancement in the process compared to how you do it now. Just following the flowchart here, I think I have stated all this. You will file quota entries as a 02 or another quota entry type or other warehouse withdrawal until the quota has filled. If the quota has filled, you will receive a message that the lower rates have filled. A couple other mechanisms we will talk about later. At that point, you are basically going to file it as a 01 at the high duty rates. We don't need to process it as quota and it is a lot simpler for everyone. There are no high rate quarter records in ACS. In ACE we don't have high rate records. The only exception is Tuna. That is probably one of the more complex scenarios. We don't know what the quota is going to be so which chart at the high rate of front and manually adjust those and refund any duties you have paid. Other than Tuna there are no high rates quarter records. The last box, trade can file at high rate at any time if you choose. Again with the exception of Tuna, there are special high-grade for opening moments and high rate Tuna [Indiscernible] if you want to file the high rate at any time to get your goods in, you can do that. You don't have to file quota as your choice to declare.

This is where I'm going to turn it over to John Raymer from our policy shop and he is going to talk about changes to quota, opening moment and policy resources.

Good morning, this is John Raymer from the quota division here headquarters. Quota opening moment, the principles are still applying as they did in the past. You will have a certain amount of time to input the documents and of course the documents must be input simultaneously. The input dates will be from midnight or 12:00 a.m. local time through noon or 12:00 Eastern standard Time. That is slightly different because you were using your local times earlier. ACE will set the system at 12:00 Eastern standard Time. You still have to have it in by that time. Don't be confused with not using your local noon hour. After all the entries have been accepted and everything is considered at the opening moment time at 12 noon Eastern standard, then a pro ration will be made. Excuse me, the pro ration will not be made. The excepted dates and times will be confirmed. Once those are confirmed and we have up to 72 hours to check any problems, if you have any problems in the system with transmissions or anything else, if you feel you have all

your documents and everything transmitted prior to 12 noon Eastern standard Time we will have 72 hours to go back and check those. You will notify headquarters or the port or other parties that would be involved in assisting you to find out what the problem was, where it exists and make corrections if applicable to be able to accept this quota. Again, we have up to 72 hours to verify and solve any of your problems. That's a benefit for you. That is the time you will have as a preliminary review. At that time the ACE system will prorate the amounts and send the prorated amounts back to you and at that time you will have five days to accept and send it back with the corrected entry. If the quota does not fill for some reason, after 12 noon Eastern standard Time, the quota will automatically revert to a first-come first-served quota. After we review 472 hours or up to 72 hours, once the reviews are completed the quota can be allocated so you can have your proration as early as 24 hours up to 72 hours after filing.

If there is any questions or any problems you need to discuss with headquarters, the port, your client Representative or anyone else, we have the time to do this however, like I said, we only allow a 72 hours but the quicker you get the problems resolved the quicker everyone will get their prorations and you can continue processing. After the prorations have been sent out you will have five days to accept it and decide what you want to do with the amount you are allowed or the noun that is remaining -- the amount that is remaining.

There are policy resources available online as you note on the board. Most of these are updated now. They will continue to be updated. Additional information will continue to be supplied as it becomes available soldier ACE experience will be pleasurable and enjoyable for you. Thank you.

This is Brian Lewandowski again. I'm going to talk about a couple of various things before we go to the list of questions we had from Tuesday's webinar. One thing I want to clarify about the opening moment process. Once headquarters triggers the proration, what will happen is ACE will calculate the prorated amount or opening moment. You will get a reject automatically from ACE and a message that will tell you what your prorated amount is. For anyone following this, you have checked the CATAIRs and you have the UC message portion because that is how you are going to know what amount and by policy you will have five days to retransmit. It does not really involve any human intervention other than monitoring your UC messages and retransmitting to as within that window. We are going to preserve those amounts and fully automated to the extent possible that does not require any human intervention other than just retransmitting from your side.

Quarter reports, -- quota reports, we have got three ways you can monitor quota status and you go from a high level down to a granular level. First, we have got the commodity graph report, the report issued weekly by headquarters that presents for different commodities and country groupings. The total amount of quota available. The total amount allocated and the total amount remaining. That is one way you can probably monitor quota is if you need to know where they are. Second you have quota query to deploy on July 23rd. You can basically

check to see quota status to see what has been allocated already. Lastly, you have your port resources. If you have got a quota close to threshold, you probably at that point in addition to using the commodity graph report and quota query, you probably want to follow what by contacting your local port in see what they see in the system or lines in the process of allocating and that way they can give you the most up-to-date information from the user interface they will have. That is how you can monitor quota within the ACE environment, similar to what you would do today in ACS.

CATAIR of dates. There is the hyperlink within the PowerPoint presentation for those UC messages and any messaging you will get back for quota. Please take a look at that. That is how you were going to get your quota information following July 23. Additionally, we have got a number of CATAIRS out there for things like draw back recon, those are things deploying later this year according to the schedule. For those, you want to look on CBP.gov and monitor those as it applies to your business process. The last thing I'm going to specifically mention before we go to Q&A, eCERT. ECERT and ACS are being combined to one thing. That is going to work in a similar fashion if you have an electronic visa. That data would get transmitted to us. If you have a paper visa, the intent would be you can supply that via DIS. To the extent possible, we want everything electronic, either the electronic visa part of the eCERT process or copy or image of that paper visa. There is no necessity at this point from a system or technical perspective to have paper involved. I'm going to tell you to follow whatever policy guidance is out there that there should be something coming out indicating you can do all of this electronically. The other thing I will advise you of is if quota is not involved related to your visa filing, then you do not have to file it as a quota entry type. It is simply a 01 or 03 at that point. If the commodity or commodities are not subject to quota, there is no need to file it as a quota entry type. Again, the guidance should be clarifying that as we go forward but that is a heads-up for everyone.

I think we are going to jump into the Q&A that were submitted to us on Tuesday and John and I will trade-off as appropriate.

The first question is will be -- enter over quota using a quota entry type?

For those, yes. I don't know if it is specified within the -- or part of a general policy document going out you do not have to file as a quota entry type was the quota has spilled or if you choose to just enter it outside of the quota.

Is there any direction as to the original visa that is presented with current quota entries? With quota entries going into ACE in a few weeks, will we still need the original visa and if so what is the importers responsibility to maintain the original document?

As was mentioned the intended is -- there should be some policy guidance or other operational guidance coming out to clarify that for trade and the field. As far as the retention piece, I am not

specifically aware of what the retention period is that generally for -- it is five years. If there is any other specific guidance outside of that, that would be issued as part of the [Indiscernible].

What about the July 8 specialty Sugar opening?

That will be processed in ACS as it is today for the opening moment. July 23rd only applies to things filed after that or the couple of days transition period. The July 8 Sugar opening process.

The July 23 deadline includes quotas subject to USDA, for example [Indiscernible]?

USDA licenses issued will be processed as quota as well so we have been working with them to ensure they are familiar with the system and they have access they need to manage their license information and basically if you have an import license, you should have no issues processing that. It is set up to allocate just like we do for a -- quota. One thing I will clarify there, the entry summary CATAIR does have a record set and a couple of fields we are you would transmit license, permit or certificate information when there is a feel for that. A second field for the type of license, permit or certificate. Any license, permit or certificate you need to send to as can be done that way. Just give us the number, tag it appropriately and we would check the format and validate if necessary in case of USDA licenses, we will validate that against our licenses.

Will there be any problems with warehouse withdrawals in ACE for the original warehouse entry was filed in ACS?

The warehouse data will be migrated over to ACE as part of the warehouse deployment. You should not have any issues there. I'm not directly involved in that when but I know they are gearing up for the July 23 deployment on the quota side so the existing ACS information would be migrated over and they shouldn't have any issues.

Will remote location filings be submitted for quota entries?

Yes. From the technical side because this is fully electronic and automated, this is another advantage of getting rid of the paper and the time stamping. Once you transmit as data, it doesn't matter where it is arriving or being filed. It will work for quota ended visa as well. The guidance in CBP.gov and other documents you need to be updated to reflect that so from the technical side we are prepared for that. More specific guidance has to be issued prior to the 23rd.

If an entry has been submitted -- at the lower rate and is filled, can we amend the entry type or 01 or do we have to cancel and file a duplicate entry?

Again, you were generally filing, more specifically filing certified from summary at the time you are requesting quota. At that point, you should not bump into this issue simply because they are both being filed at the same time. If you file than as a zero when using the low

rate you will get a message back saying they are subject to quota. If you change the 202 [Indiscernible].

What about the tobacco -- that opens on September 13?

Quotas do open at different times during the year. For that one having talked to the policy folks, that when should not be an opening moment situation. That is a normal quota that opens so at that date the quota record starts you would by filing using the low rate quota entry type if you are requesting and allocation. [Indiscernible].

That is correct. Tobacco is not normally an opening moment. It has been on an opening over will for several years so it is normal first-come first-served quota and it will be treated as such.

An additional note for people, headquarters does have functionality similar or enhanced from what is in ACS to hold quotas and manage them and do other types of things. In the event it looks like something is going to be filled or we are getting feedback from the trade there is a high demand for something, they have the ability to manage the master quota data and you can put it on hold until they see what happens.

If the data presentation is the date the statement is paid, that could potentially be 10 days later than the entry transmission date, how does that make sense compared to the current method?

Again to clarify, data presentation, there are two things when it comes to the payment status. Maybe I will clarify the presentation date right now. First we are using arrival dates if there is cargo and if it is warehouse we are not using arrival date. We are using the data entry summary is transmitted to us. That is the date we receive the data via ABI, the date and time stamp. Lastly, it is the earliest of whether the date is paid, if you are paying straight out up front or the date you schedule a future payment dates, whatever the future payment date happens to be doesn't matter to us for the purposes of quota, it is just too scheduled it on a specific date. If you schedule on Monday and pay on Thursday, we are going to use Monday as the date. Between those three things, the arrival date, the entry submission date and entry summary submission date and the payment date or the day upon which his schedule of future payment dates, we will use the latter of those three. One other note is you can still file non-ABI in ACE. Just be aware the automated process is a little more efficient and whatnot. Once we have your non-ABI, in this case -- we use your time stamp as the date you submitted to us.

John, what is the time for the quota branch to review and resolve issues?

I stated earlier the amount of time the quota branch will review all of the submissions for opening moment will be 72 hours.

Thank you. Are we allowed to transmit quota entries the ABI [Indiscernible]?

Yes, from the technical side, absolutely. We have things set up so we can process this electronically. Some additional guidance does need to come out to clarify that.

Please advise regarding these entries and -- program. The visa will be submitted electronically as well?

Yes. If it is part of the electronic program, you would send it electronically to eCERT. If it is part of the electronic visa program under eCERT or Elvis under ACS we are basically consolidating those into eCERT in the ACE environment and you would submit that electronically. The paper visa can be submitted via DIS but again some operational guidance or policy clarification [Indiscernible] from the technical side. Of course, local ports may still request paper for whatever operational needs they have. Then you have the retention of the original that should follow regulation or policy guidelines that are issued.

The prorated percentage of duties and fees change. How will we update the amounts payable to CBP?

We are going to have to issue some guidance on statement interactions. Statements in ACE is scheduled to depart October 1st and at that point should be straightforward. We will have specific guidance as we get closer to that date. While we are still processing statement collections in ACS between delight 23rd and October 1st, we will probably have to supply some additional guidance. I just don't have the specifics on hand but that involves a couple different teams and we will make sure we get the technical information to John and the other policy folks and any guidance issued there.

Does a file have to wait until July 23rd 2 file -- using entry type 01?

That is a very good question. My honest answer is I don't know. Technically if you are filing a 01 and you want to use the high rate I believe you could do it in ACE, I just don't no operationally that's that is advisable to do. I don't want to eCERT John, but given that quota is still being managed in ACS at this point up until July 23, I think they would want all quotas to be continue to be managed in ACS even if it is a high rate at this point.

I agree it should be consistent. All the quotas should be maintained in ACS until the cutover date at one time so there is no questions in anything that can create a problem further down the road.

If I am processing a Tuna entry on July 24, 2016, what I process at the high rate as a type 01 entry?

Tuna processing would be done at the high rate. There are four HTS numbers used in the opening moment quota. That's the only time those numbers are used. It as I had a high rate but a different HTS number. Opening moment always fills in Tuna. Any Tuna filed outside opening

moment presentation will be used at the regular high rate on a normal HTS.

Thanks, John. What about entries with original FISA presented with quota entries -- requires an original FISA to be presented for entry rabies? With quota entries going into ACE in a few weeks will importers be the original visa [Indiscernible]

I think we covered this one. If you have something subject to visa, you can do that through [Indiscernible].

Again some policy or operational guidance should be issued so trade and ports -- the document retention would be guided by regulation or any other policy guidance that would come up and if the entry has no quota lines on it, that could be entered [Indiscernible].

t h e q u e s t i o n o n S u g a r , f o r R o d S u g a r t h a t i n c l u d e s s a m p l e s , [Indiscernible] of the rising moved to our warehouse for the samples. If there is no 3461 in ACE, how will we move the containers to our warehouse?

That is a fantastic question. We had to touch base with their counterparts in the office of Field operations to maybe understand that process there. They have an operational solution to getting samples. [Indiscernible]

or come up with the new approach. Alternately what we are trying to do is facilitate legitimate goods as much as possible and automate as much as possible so we will touch base with our counterparts in field operations. The other suggestion is if there is a specific scenario you are encountering local to your port that we are not aware of, let us know. Again brian.lewandowski@cbp.dhs.gov and you can contact headquarters and John Raymer.

Will CBP removing -- over quoted HTS numbers currently flagged for quota?

This was discussed and it appears the flags will not transfer over to ACE. All the flags in ACS should not be applicable in ACE when you file a 01 entry at the high rate. It should go through without requesting anything. I won't say it is an exception that under the Sugar program, if you file a Sugar at the high rate you must use the corresponding safeguard number which is the 9904 number. If you combine the 99 safeguard number with your two high rate quotas which are -- there will not be any CQ -- CQE required for this entry.

For opening timeframe, 12:00 a.m. to 12:00 p.m. will all entries be accepted only after 12:00 p.m. can they be rejected if full?

Between 12:00 a.m. and 12:00 p.m. we will take any data you transmit to as. That is the opening moment window. As far as anything that comes in after 12:00 p.m. as John said earlier, in the event the quoted does not fill we would start at allocating those first in first out. If there is for some reason some Sugar remaining after opening moment that would be available to anyone that files after 12:00 p.m.. With anyone filing after 12:00 p.m. on the day of opening moment, you should qualify. If you're having problems with transmission or similar type of data

issue, the suggestion to contact your client -- to let them know you're trying to transmit in trying to get dated to us and headquarters has stated as long as we have made a good-faith effort and we can validate that within the 72 hour period following opening moment they will make sure you get a prorated --

One thing I would like to add so there is not any confusion, this opening moment has been discussed at length however, normal quotas if you transmit those at midnight or during the weekend, normal first-come first-served quota, the quota hours still apply as they did during the regulations and also as ACS. If you transmit anything after 1630 on Friday it will not be put into the system until 0830 on the following Monday morning or the day after holiday. Your times for transmission for non-opening moment quota is the same as they are now in ACS.

Thanks, John. I have a couple more questions. Will be -- no longer advise [Indiscernible] quota entry type?

Could you repeat the question?

Will be -- no longer be advised to enter quota using a quota into type?

They may or may not be changed, we will have to discuss that. The quota types can still be shown that again if you use the high rate quota it will not be a quota entry, it will be in a type 01 entry so there probably won't be any necessity of putting it -- at any time.

Thank you. Will CBP remove the Sugar certificate flagging for over quoted numbers?

As I mentioned, their two over quoted HTS numbers. As long as these two numbers are coupled with their appropriate safeguard numbers which is your 9904 number series, there will be no certificate required and no flagging should apply.

Also for Sugar, for Sugar there are three quotas in the month of October. How long will CBP take the process and reject the entry outside the prorated percentage so rejected entries can be resubmitted for the next quota that follows in a week or two.

As we stipulated earlier, headquarters will have up to 72 hours to amend or just any problems with the opening moment. In addition to that, there will also be a series of numbers. For those of you who have used the last two sugar openings of moments, one I believe it was in April -- the last two Sugar openings -- they've used the new 1703 numbers. I'm sorry, 9903 numbers. These numbers are particular to each of the openings to each of the tranches. There will be no mixup or any problem. Just make sure when you use the 9903 numbers that you use the appropriate number. Basically even if, which I don't see any problem, the closest is from January 3rd to January 10th which is seven days. If we take all 72 hours to find any problems and allocated in you take the five days to send it back, you're almost going into the second tranche after the opening moment which is no problem because you're a second tranche will be using a different 9903 number coupled

with your 17s. With this in process, and again if you have used the last two openings and this opening coming in July which will still be in ACS, you will have the experience of using the 9903 numbers. You will know how they operate so even if the quota opening is not totally finished, you can still supply the overflow Sugar to the next opening because you still have your proration and you will use a different number to apply for the next tranche.

Will we be able to read transmit PGA data with the entry is in reject status?

I'll answer that, but the be quickly for John and myself, we have about 10 minutes left for this webinar so were going to try to go through these questions as quickly as possible at this point. Once you submit certified from summary, the data on the summary side, we will continue processing that whether there is a reject on the cargo summary side or not so at that point you would just read transmit the cargo piece independently and resolve it.

Are we allowed to transmit quota entries at this time be a ACE Kroger Woody's?

No. Those deployed at July 23.

If the quarter entry is regulated by USDA and they don't have the mandate, is the July 23 deadline applicable to this quota?

July 23rd, you will be filing your quota entry types in ACE. The PGA piece for cargo is independent of what we are doing on the quota side. I don't no exactly what the time frames are for USDA data or mandate dates off the top of my head that basically if there is cargo guidance out there, you were still going to follow it. The only distinction is when you [Indiscernible]

With the original visa still be required?

DIS and policy should be coming out on that one.

If there issues with the filing at midnight will be -- address issues at that time?

Basically if you are having some technical issues, what I would say at the earliest possible time, the morning of opening moment, you context client reps even if they are outside your time zone and try to get that resolved in certainly when the port is open you contact the port and see what is going on. As long as there is some indication you have made good-faith effort you will have 72 hours to work with headquarters to resolve technical issues you are having to ensure you get quota at opening moment. For other types of quotas where there is no quota available, those can be resolved later in the business day or the next business day [Indiscernible]

We would be required to transmit -- or just the TPL number in the entry summary data?

Excellent question. A couple of things there. First, the intent is to accept the TPL number via the entry summary data. That is the only thing you need to give us. DIS is there to accept certificates of eligibility or any other documents you have so I think from the get-go it will probably have to do some clarifying guidance and policy. I would say submit both the number and the document. We've had some questions when I submit something via DIS, how quickly do I have to do it? Again, operational guidance can clarify that that technically we have to have an excepted entry or entry summary to take in that document so it's going to be two transmissions. You will give us your data via ABI and then you have something to attach the document to. We would take back and a reasonable person would say within 24 hours get us that document. Generally you want to do it as soon as you can, the policy would clarify that timeframe for getting any -- document to us. A couple of other things there, I know some folks have indicated with TPLs they will file a 01 at cargo and then have the TPL as a 02 at summary and before we -- people are encountering issues. They filed the 01 in ACE but they can't file the 02 in ACE because we haven't deployed quota yet. I can say informally what people have been doing to resolve some of these situations and what some ports have been accepting is allowing the tray to file the 01 in ACS to facilitate the filing of the 02 in ACS prior to July 23. For about the next month or so, that would generally be acceptable if it facilitates things as long as the importer knows that is what you are doing [Indiscernible]. That is unofficial guidance but it is just to facilitate the situation.

Is FDA -- do you do the cargo first and then summary or do you have to file your FDA information at summary?

Your filing certified from summary -- the cargo piece of that. If you have any issues as stated before, any rejects are issues, [Indiscernible].

What is customs suggestion of what importers should do with original thesis coming from overseas vendors? In the past the original pieces were submitted to customs but now that ACE will hold them electronically what is the requirement for importers? [Indiscernible]

Again, -- says five years but there may be more specific guidance coming from the policy side.

So cargo will be totally automated in the entry would not have to be submitted in paper form before the cargo release follows?

Correct. The intent is to automate as much as possible all the portal process. You don't want the paper and you don't want to bring the paper in. We want to send you electronic messages straight from the system to your system.

Are any changes allowed on statements 402 entries that the entry summary was accepted already? Date changes in the past, I believe quota entries are locked and no changes to statements would be allowed.

Again, we have to issue clarifying guidance as far as statements in ACE and then we will have to supply some additional guidance for this interim period while statements are being processed in ACS following July 23 the preceding October 1st.

Okay. We would need to transmit the entire entry summary packet or just the visa image via DIS?

Visa image should be acceptable barring any local requirements for higher-level policy guidance.

Okay. For importers that are members of the -- is there a timeframe -- [Indiscernible]

Given this is an electronic process now, this is something we are aiming for to accommodate the process to support the centers. I don't know the timeframe for them to kick this over but it certainly can be done. I think operationally following deployment they have to migrate that into the existing center process.

I think that's all the time we have for questions. We want to thank everyone for bearing with this on the original call on Tuesday with the audio problems we are having. We hope this recording has been a formative and certainly we will continue to try to answer any questions that will come up. Be aware following deployment we will have a war room available for you to contact us and we will have that staff for the two weeks following July 23rd and you can also reach out to your client reps and your local ports. We have the trouble ticket process as well. We would try to have different resources available for that. Again, thank you everyone and we greatly appreciate your participation in this webinar and we hope the quoted deployment goes smoothly and that you find it is an enhancement over how you process quota. Thank you, very much.

[Event Concluded]