

# CBP and Trade Automated Interface Requirements

Department of Justice  
Drug Enforcement Administration (DEA)

Implementation Guide for the Customs and Trade Automated Interface Requirements (CATAIR) in Support of the Automated Commercial Environment (ACE)

V2.3  
May 10, 2016



U.S. Customs and Border Protection



## Document History:

Date of Change	Version	Section	Description
08/17/2015	1.0	All	Initial draft
10/07/2015	1.1	All	The PGA controls used by the DEA for controlled substances and listed chemicals were updated in this document.
10/29/2015	2.0	2.0	Changes made to address single entry of PG02P, removal of drug names and company names, addition of PG22.
11/24/2015	2.1	2.0	DEA form names and DEA form examples inserted. PG02 Product Code Qualifier and PG19 Entity Identification Code added as optional items.
02/10/2016	2.2	2.0	Added PG06 for Country Code and removed PG19 with "EX" and PG20 for Country code. Added PG30 for Arrival Date.
05/10/2016	2.3	2.0	Updated IG to provide further guidance for Record Identifiers.

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## 1.0 Introduction

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This document serves as the Implementation Guide (IG) for the Customs and Trade Automated Interface Requirements (CATAIR) in support of the Automated Commercial Environment (ACE) for the import of controlled substances and listed chemicals into the United States.

### 1.1 Purpose

The U.S. Customs and Border Protection (CBP) will use the ACE system to determine whether documents required by the DEA have been filed with the DEA for imports of controlled substances and listed chemicals into the United States prior to their actual arrival.

### 1.2 Authority

The DEA implements and enforces Titles II and III of the Comprehensive Drug Abuse Prevention and Control Act of 1970, as amended. 21 U.S.C. 801–971. Titles II and III are known as the “Controlled Substances Act” and the “Controlled Substances Import and Export Act,” respectively, and are collectively referred to as the “Controlled Substances Act” or “CSA”. The CSA is designed to prevent, detect, and eliminate the diversion of controlled substances and listed chemicals into the illicit market while ensuring an adequate supply is available for the legitimate medical, scientific, research, and industrial needs of the United States. Controlled substances have the potential for abuse and dependence and are controlled to protect the public health and safety. Controlled substances generally include narcotics, stimulants, depressants, and hallucinogens that have a potential for abuse and physical and psychological dependence, as well as anabolic steroids. Listed chemicals are separately classified based on their use and importance to the illicit manufacture of controlled substances (List I or List II chemicals). Through the enactment of the CSA and its amendments, Congress has established a closed system of distribution making it unlawful to handle (manufacture, distribute, reverse distribute, dispense, conduct research, engage in narcotic treatment or maintenance, import, export, collect, or conduct chemical analysis) or otherwise possess any controlled substance or listed chemical except in a manner authorized by the CSA.

In order to maintain this closed system of distribution, the CSA requires handlers of controlled substances to be registered at each principal place of business or principal place of professional practice where such substances are manufactured, distributed, dispensed, imported, or exported. Handlers of List I chemicals must be registered at each principal place of business where such chemicals are imported or exported; and they must be registered at each principal place of business or principal place of professional practice where such substances are manufactured or distributed. A “registrant” is any person who is registered pursuant to either section 303 or section 1008 of the CSA (21 U.S.C. 823 or 958). Registrants are permitted to possess controlled substances and List I chemicals as authorized by their registration and must comply with the applicable requirements associated with their registration. A “regulated person” means a person who manufactures, distributes, imports, or exports a listed chemical, a tableting machine, or an encapsulating machine or who acts as a broker or trader for an international transaction involving a listed chemical, a tableting machine, or an encapsulating machine. Regulated persons who engage in “regulated transactions,” defined at 21 U.S.C. 802(39), are subject to specified recordkeeping and reporting requirements pursuant to 21 U.S.C. 830, 971; 21 Code of Federal Regulations part 1310. The Attorney General has delegated these authorities to the Administrator of the DEA, who in turn has re-

delegated many of these authorities to the Deputy Administrator of the DEA and the Deputy Assistant Administrator of the DEA Office of Diversion Control. Within the DEA, the Office of Diversion Control is the strategic focus area that carries out the mandates of the CSA to ensure that adequate supplies of controlled substances and listed chemicals are available to meet legitimate domestic medical, scientific, industrial, and export needs. The Office of Diversion Control carries out the mission of the DEA to prevent, detect, and eliminate the diversion of these substances into the illicit drug market. Activities in support of the Office of Diversion Control and its mission include: determination of program priorities; field management oversight; coordination of major investigations; drafting and promulgating regulations; the design and proposal of national legislation; advice and leadership on State legislation/regulatory initiatives; **oversight of the importation and exportation of controlled substances and listed chemicals**; establishment of national drug production quotas; activities related to drug scheduling and compliance with international treaty obligations; the design and execution of diplomatic missions; computerized monitoring and tracking of the distribution of certain controlled substances; planning and allocation of program resources; and liaison efforts with industry and their representative associations as well as the DEA's regulatory and law enforcement counterparts at the federal, state and local levels.

### 1.3 General Distribution

This document may be released for general distribution.

## 2.0 Guidance for Trade

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The DEA authorizes all imports of controlled substances and listed chemicals prior to their arrival into the United States. The PGA Message Sets for imports of controlled substances and listed chemicals must have the following Record Identifiers: OI, PG01, PG02, PG04, PG06, PG14, PG19, PG22, and PG30, which identify the data deemed pertinent to the DEA. As such, the DEA requires the mandatory (M) entry of the data elements in the tables listed in section 2.2.1 through 2.2.10 for these Record Identifiers with the exception of the PG02 Product Code Qualifier (6 – 9) and PG19 Entity Identification Code (8 – 10) fields, which are optional (O).

### 2.1 General Rules for Data Submission

The following general rules only apply to the DEA, not to other PGAs. The Record Identifiers required by the DEA adhere to the same general rules for data submission as those listed in the PGA Message Set INPUT Record Layouts section of the ACE ABI CATAIR document.

### 2.2 PGA Controls used by the DEA for controlled substances and listed chemicals

The Record Identifier OI must occur one time. The DEA does not require an entry in the Commercial Description.

The Record Identifier PG01 must occur one time. The PGA Line Number must be entered and is dependent on the line number of other PG01 records entered. The Government Agency Code must be “DEA”. The Government Agency Program Code must be “DEA”. The Electronic Image Submitted must be “Y” unless the substance is disclaimed because it’s not a controlled substance or listed chemical. In such case, this field must be blank. The Confidential Information Indicator must be “Y” unless the substance is disclaimed because it’s not a controlled substance or listed chemical. In such case, this field must be blank. If the substance is disclaimed an “A” must be entered in Disclaimer. Please note that no further Record Identifiers are required for DEA if the substance is disclaimed.

The Record Identifier PG02 with an Item Type = “P” must occur one time. The DEA does not require any other information for this record identifier.

The Record Identifier PG02 with an Item Type = “C” must occur for each component that is regulated by the DEA. The Product Code Qualifier is an optional entry field but must be “CSA” if entered. The Product Code Number must be the DEA drug code of the component. The DEA drug codes are four characters in length, all numeric.

The Record Identifier PG04 must occur for each Record Identifier PG02 with an Item Type = “C”. The Quantity of Constituent Element must be the base weight (not the salt or derivative weight) of the controlled substance or listed chemical. This field must be padded with zeros to the left; there are two (2) implied decimal places. Please note that the DEA will convert the base weight of a component from kilograms to grams, grams to milligrams, or milligrams to micrograms to ensure the base weight is not equal to zero (ex. 0.0025 G = 2.50 MG) The Unit of Measure (Constituent Element) must be the base weight’s unit of measure.

The Record Identifier PG06 must occur one time. The Source Type Code must be “CSH”. The Country Code must be entered for the country from where the controlled substance or listed chemical was shipped into the United States as provided to DEA by the registrant or regulated person.

The Record Identifier PG14 must occur one time. The LPCO Transaction Type must always be “1”. The DEA issues one-time use only permits and declarations for each shipment of controlled substances or listed chemicals. The LPCO Number must be entered. This number is seven alphanumeric characters in length (do not include the dash and amendment number) and should be listed on the DEA form; it can also be obtained from the registrant or regulated person.

The Record Identifier PG19 must occur one time. The Entity Role Code must be “LAP”. The Entity Identification Code is an optional entry field but must be “164” if entered. The Entity Number must be the DEA Registration or company ID number of the U.S. party authorized by the LPCO. This number is nine alphanumeric characters in length.

The Record Identifier PG22 must only occur one time. Use the appropriate Document Identifier code listed in the table below for the form type to be uploaded into the Document Imaging System (DIS).

DEA Form	Information	Document Identifier
DEA-35	Import permit for the import of any controlled substance listed in schedule I or II or any narcotic controlled substance listed in schedule III, IV, or V	911
DEA-236	Declaration for the import of any non-narcotic controlled substance listed in schedule III, IV, or V	921
DEA-486	Declaration for the import of any List I or II substance except Ephedrine, Pseudoephedrine, or Phenylpropanolamine	922
DEA-486A	Declaration for the import of Ephedrine, Pseudoephedrine, or Phenylpropanolamine	923

The Record Identifier PG30 must only occur one time. The Inspection/Laboratory Testing Status must be “A”. The date of arrival must be entered in the Arrival date field. The format for this field must be MMDDCCYY.

### 2.2.1 Record Identifier OI

Data Element	Position	Status	Information
Commercial Description	11 – 80	M	DEA does not require an entry for this field

### 2.2.2 Record Identifier PG01

Data Element	Position	Status	Information
PGA Line Number	5 – 7	M	Dependent on other PGA Line Numbers
Government Agency Code	8 – 10	M	“DEA”
Government Agency Program Code	11 – 13	M	“DEA”
Electronic Image Submitted	17	C	“Y” if not disclaimed, blank if disclaimed
Confidential Information Indicator	18	C	“Y” if not disclaimed, blank if disclaimed
Disclaimer	80	C	Blank if not disclaimed, “A” if disclaimed

### 2.2.3 Record Identifier PG02 with Item Type = P

Data Element	Position	Status	Information
Item Type	5	M	“P” for product

### 2.2.4 Record Identifier PG02 with Item Type = C

Data Element	Position	Status	Information
Item Type	5	M	“C” for component
Product Code Qualifier	6 – 9	O	“CSA”
Product Code Number	10 – 28	M	DEA drug code of the component

### 2.2.5 Record Identifier PG04

Data Element	Position	Status	Information
Quantity of Constituent Element	57 – 68	M	Base weight of the component, zero filled to the left with 2 implied decimal places on the right
Unit of Measure (Constituent Element)	69 – 73	M	Unit of measure (“KG”, “G”, “MG”, “MCG”) of Quantity of Constituent Element

### 2.2.6 Record Identifier PG06

Data Element	Position	Status	Information
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Source Type Code	5 – 7	M	“CSH” for Country of Shipment
Country Code	8 – 9	M	Country Code of the country from where substance is shipped as provided to DEA by the registrant or regulated person

### 2.2.7 Record Identifier PG14

Data Element	Position	Status	Information
LPCO Transaction Type	5	M	“1” for single use
LPCO Number	9 – 41	M	DEA permit or transaction ID number

### 2.2.8 Record Identifier PG19 (U.S. Entity)

Data Element	Position	Status	Information
Entity Role Code	5 – 7	M	“LAP” for the registrant or regulated person
Entity Identification Code	8 – 10	O	“164”
Entity Number	11 – 25	M	DEA registration or company ID number

### 2.2.9 Record Identifier PG22

Data Element	Position	Status	Information
Document Identifier	6 – 12	M	Use Document Identifier code (see page 7) for the DEA form type to be uploaded into the Document Imaging System (DIS)

### 2.2.10 Record Identifier PG30

Data Element	Position	Status	Information
Inspection/Laboratory Testing Status	5	M	“A” for Anticipated arrival information
Arrival date	6 – 13	M	Date of arrival (MMDDCCYY)

## 2.3 DEA PGA Message Set Examples

The following are examples of PGA Message Sets for the import of DEA regulated substances.

The first example (2.3.1) is an import of an anabolic steroid (Boldenone) from China. In order to be compliant with 21 CFR (Code of Federal Regulations) § 1312, the registrant had to submit a DEA-236 form (see DEA-236 form example) to the DEA at least 15 days prior to the importation of the controlled substance into the United States. The DEA reviewed the form and subsequently issued the registrant a transaction identification number (1QQSOU4) for this import.

The second example (2.3.2) is an import of two drug products, each of which contains pseudoephedrine, from India. In order to be compliant with 21 CFR § 1313, the registrant had to submit a DEA-486A form (see DEA-486A form example) to the DEA at least 15 days prior to the importation of the listed chemical into the United States. The DEA reviewed the form and subsequently issued the registrant a transaction identification number (Y27TFG7) for this import.

The third example (2.3.3) is an import of two drug products, each of which contains buprenorphine, from the United Kingdom. In order to be compliant with 21 CFR § 1312, the registrant had to submit a DEA-357 form, which is an application for a permit to import, to the DEA prior to the importation of the controlled substance into the United States. The DEA reviewed the application and subsequently issued the registrant a DEA permit to import (see DEA-35 example 1) with permit number (FU77R3A) for this import.

### **2.3.1 DEA-236 form with one product containing one component**



U.S. Department of Justice / Drug Enforcement Administration <b>CONTROLLED SUBSTANCES IMPORT / EXPORT DECLARATION</b> <i>(Read Instructions on reverse before completing)</i>		OMB APPROVAL No. 1117-0009 EXPIRATION DATE: 9/30/2016 See reverse for Privacy Act
1. CHECK ONE	<input checked="" type="checkbox"/> <b>IMPORT DECLARATION</b> Nonnarcotic Substances in Schedules III, IV, V  <input type="checkbox"/> <b>EXPORT DECLARATION</b> Nonnarcotic Substances in Schedules III, and IV and all substances in Schedule V	<b>U.S. CUSTOMS CERTIFICATION</b> Date of Departure/Arrival  Date of Certification  Signature of Customs Official  DEA Transaction ID <b>1QQSOU4-2</b>
IMPORTER/EXPORTER (Name and Address) DEA-ODGI-TEST 600 ARMY NAVY DRIVE ARLINGTON, VA 22202  DEA REGISTRATION NO. <u>RD0445355</u>		BROKER OR FORWARDING AGENT, IF USED (Name and Address)
<b>2. CONTROLLED SUBSTANCES TO BE IMPORTED OR EXPORTED</b>		
2a. NAME AND QUANTITY OF DRUG OR PREPARATION <i>(Enter names as shown on labels; numbers and sizes of packages; strength of tablets, capsules, etc., CSA Drug Code and NDC Number)</i>  BOLDENONE - 1,144 BOTTLES, 100 GRAMS/BOTTLE  DRUG CODE 4000 NDC # G4000-0200-**	2b. CONTROLLED SUBSTANCE CONTENT OF DRUG OR PREPARATION expressed as acid, base or alkaloid. <i>(Enter names of controlled substances contained in the drug, compound, or preparation)</i>  1,144 X 100 = 114,400 GRAMS (BASE)	2c. DATE IMPORTED/EXPORTED AND ACTUAL QUANTITY <i>(Completed by registrant at time of transaction)</i>
3a. <input checked="" type="checkbox"/> FOREIGN (for U.S. import) <input type="checkbox"/> DOMESTIC (for U.S. export) PORT OF EXPORTATION AND APPROX. DEPARTURE DATE BEIJING, CHINA    11/07/2015	3b. <input type="checkbox"/> FOREIGN (for U.S. export) <input checked="" type="checkbox"/> DOMESTIC (for U.S. import) PORT OF IMPORTATION AND APPROX. ARRIVAL DATE JFK AIRPORT - NEW YORK    11/10/2015	
4a. MODE OF TRANSPORT; NAME OF VESSEL / CARRIER (if known) BRITISH AIR	4b. NAME OF ALL INTERMEDIATE CARRIERS	
5. NAME AND ADDRESS OF FOREIGN CONSIGNEE/CONSIGNOR TOPSY-TURVY PHARMACEUTICAL CO. HUTONG NO. 45 BEIJING, CHINA		
I hereby certify that the substance(s) listed in Section 2 are to be <input checked="" type="checkbox"/> Imported (conform to 21 U.S.C. § 952(b)) <input type="checkbox"/> Exported (conform to 21 U.S.C. § 953(e)) and are intended for <input checked="" type="checkbox"/> Medical, <input type="checkbox"/> Scientific, or <input type="checkbox"/> Other legitimate uses (attach explanation for other legitimate use).  <input type="checkbox"/> The above named substances are to be Re-Exported (Attach documentation per Title 21, CFR 1312.27) to (list countries):		
If the form is being used as an "Export Declaration", attach documentation that the consignee is authorized under the laws and regulations of the country of destination to receive the controlled substances. If the controlled substances are being re-exported from the first country to second countries, attach documentation that the consignee in the country of ultimate destination is authorized under the laws and regulations of that country to receive the controlled substances.		
SIGNATURE OF AUTHORIZED INDIVIDUAL OF IMPORTER / EXPORTER, BROKER OR FORWARDING AGENT	DATE 10/24/2015	NAME OF FIRM AND TELEPHONE NUMBER DEA-ODGI-TEST
Print Name: MARK VIA DEA FORM-236 <span style="float: right;">COPY 1</span>		

**2.3.2 DEA-486A form with two products containing the same component**



- Entity Role Code (“LAP”)
- Entity Identification Code (“164”); this is an optional entry
- Entity Number (“RD0445355”). This number is the registration or company identification number of the U.S. LPCO Authorized Party
- PG22: Document Identifier (“923”)
- PG30:
  - Inspection/Laboratory Testing Status (“A”)
  - Arrival date (“10172015”)

DEA-486A form example

U.S. Department of Justice		<b>Import Declaration for Ephedrine, Pseudoephedrine and Phenylpropanolamine</b>		Drug Enforcement Administration	
<b>SEE INSTRUCTIONS FOR PRIVACY ACT</b>			OMB Approval No. 1117-0023		Expiration Date: 2/29/2016
1. Type of Submission: <input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> AMENDED <input type="checkbox"/> WITHDRAWAL			DEA TRANSACTION ID NUMBER: Y27TFG7-0		
<b>NOTICE!</b> A 15-day advance notice is required for all U.S. imports of Ephedrine, Pseudoephedrine, and Phenylpropanolamine.					
2a. NAME OF IMPORTER DEA-ODGI-TEST			2b. ADDRESS OF IMPORTER 600 ARMY NAVY DRIVE ARLINGTON, VA 22202		
2c. DEA REGISTRATION NUMBER: RD0445355					
2d. TELEPHONE NO. OF IMPORTER 202-307-1000		2e. E-MAIL ADDRESS OF IMPORTER		2f. PURCHASE/INVOICE NO. (optional) *** TEST FORM ***	
3a. NAME OF FOREIGN EXPORTER FOREIGN COMPANY			3b. ADDRESS OF FOREIGN EXPORTER PLOT NOS. 81/1, 81/3, & 81/5 NEW DELHI, INDIA		
4a. NAME OF FOREIGN MANUFACTURER (If same as 3a, enter "Same as 3a") SAME AS 3A			4b. ADDRESS OF FOREIGN MANUFACTURER		
5a. NAME OF FOREIGN DISTRIBUTOR (If applicable)			5b. ADDRESS OF FOREIGN DISTRIBUTOR (If applicable)		
<b>EPHEDRINE, PSEUDOEPHEDRINE, AND PHENYLPROPANOLAMINE TO BE IMPORTED</b>					
6a. Name and Description of chemical appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02).		6b. Import Quota	6c. Number of containers, size, net weight (express as base) in kilograms for each chemical listed. For drug products, show number of dosage units.		6d. Actual Date of Import; Name of each chemical imported and its Actual Net Weight (To be completed by importer).
COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL (8112)		Current year Quota [ 2015 ]  17,500 GRAMS	1,988 BOTTLES X 50 TABLETS/BOTTLE X 120 MG/TABLET = 11,928 GRAMS  11,928 GRAMS X 82% = 9,780.96 GRAMS		
COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (60'S) HCL (8112)		Quota used to date for current year 2,500 GRAMS	1,590 BOTTLES X 50 TABLETS/BOTTLE X 60 MG/TABLET = 4,770 GRAMS  4,770 GRAMS X 82% = 3,911.40 GRAMS		
		Amount of Quota remaining 15,000 GRAMS			
7a. FOREIGN PORT OF EXPORTATION: NEW DELHI, INDIA			APPROX. DEPARTURE DATE: 10/07/2015		
7b. DOMESTIC PORT OF IMPORTATION: MEMPHIS, TN			APPROX. ARRIVAL DATE: 10/10/2015		
8. MODE OF TRANSPORTATION and NAME OF VESSEL or NAME OF CARRIER: MARY POPPINS AIRWAYS					
9. RETURN DECLARATION FOR IMPORTER. MUST be returned within 30 days from actual date of import (6d).					
SIGNATURE: STEPHEN VIUGG					DATE: 09/17/2015
DEA FORM - 486A (Previous version obsolete.)			Page 1		Copy 1



- PG19 (#1):
  - Entity Role Code (“LAP”)
  - Entity Identification Code (“164”); this is an optional entry
  - Entity Number (“RD0445355”). This number is the registration or company identification number of the U.S. LPCO Authorized Party
- PG22: Document Identifier (“911”)
- PG30:
  - Inspection/Laboratory Testing Status (“A”)
  - Arrival date (“10122015”)



U.S. Department of Justice  
Drug Enforcement Administration



# PERMIT TO IMPORT

The Administrator of the Drug Enforcement Administration, being the official charged with the administration of the laws relating to the importation of the dangerous drugs to which the Controlled Substances Import and Export Act and the several international treaties apply, authorizes and permits the following importation of controlled substances from the United States.

DATE OF ISSUE SEPTEMBER 19, 2014	EXPIRATION DATE DECEMBER 31, 2014	PERMIT NO. <b>FU77R3A-0</b>
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**IMPORTER**  
U.S. IMPORTER  
100 PINE STREET  
ARLINGTON, VA 22202

**CONSIGNOR**  
FOREIGN SUPPLIER  
25 CANDY LANE  
EDINBURGH, SCOTLAND, U.K.

<b>PORT OF IMPORT</b> PHILADELPHIA, PENNSYLVANIA	<b>FOREIGN PORT OF EXPORT</b> EDINBURGH, SCOTLAND, UNITED KINGDOM
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Importer is hereby permitted under the provision of the Controlled Substance Import and Export Act to import items below.

Item No.	Number and Size of Packages	Name of Substance or Preparation	Controlled Substances Content
1	2 CONTAINERS 25,000 GRAMS/CONTAINER	BUPRENORPHINE HYDROCHLORIDE	50,000 GM BUPRENORPHINE HCL (46,500 GM BASE)
2	1 CONTAINER 13,000 GRAMS/CONTAINER	BUPRENORPHINE HYDROCHLORIDE	13,000 GM BUPRENORPHINE HCL (12,090 GM BASE)
	***	NOTHING FOLLOWS	***

Total Number of Items TWO

The consignment proposed to be imported is required for legitimate purposes.

NOTES:

**Endorsement by U.S. Customs (Original)** This is to certify that the controlled substance merchandise described herein was imported into this port. If quantity is different than permitted, please indicate in Notes section above.

_____ (Port)	_____ (Signature/Title)	_____ (Date)
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For the Administrator:  
Chief  
Import and Export Unit  
DEA Form 35 (10/10)

Address:  
Drug Enforcement Administration  
Import/Export Unit (ODGI)  
8701 Morrisette Drive  
Springfield, VA 22152

\_\_\_\_\_  
(Signature)

**ORIGINAL --- TO ACCOMPANY SHIPMENT AND AFTER ENDORSEMENT BY U.S. CUSTOMS FORWARD TO DEA**