

**NORTH AMERICAN FREE TRADE AGREEMENT (NAFTA)**  
**AUDIT (VERIFICATION) MANUAL**

**CHAPTER 6**  
**METHODOLOGY FOR RULE OF ORIGIN AUDITS (VERIFICATIONS)**

This Chapter reviews the verification process. This process has already been briefly described in Chapter 3, Section 3.1. This Chapter will analyze the process in the context of an overview of the operation of the verification function within the Customs Administration of the Party conducting the verification.

The Sections of this Chapter describe the origin verification process, which can be highlighted as follows (refer to Exhibit A at the end of this Chapter for an overview of the verification process):

- 6.1 Types of verifications
- 6.2 Identification and Selection of Goods for Verification
- 6.3 Notification to Relevant Parties
- 6.4 Planning
- 6.5 On-Site Verification
- 6.6 Analysis of Information and Finalization
- 6.7 Written Determinations
- 6.8 Notifications and Reassessment/Liquidation

For an outline of the verification process for the other parties, refer to the respective Annex 6, Sections 6.1 through 6.8 at the end of this Chapter.

Due to the implementation of the NAFTA, the U.S. Customs Service has issued several Customs Directives. These Directives are included here to cover the topics of Chapter 6.

Sections 6.1 through 6.6 will be covered by Customs Directive 3810-08, entitled Notification of Proposed Verification Visits Under the North American Free Trade Agreement (NAFTA).

Sections 6.7 and 6.8 will be covered by Customs Directive 3810-010, entitled Issuance of Origin Determinations Under the North American Free Trade Agreement (NAFTA).

**SECTIONS 6.1 through 6.6**  
**CUSTOMS DIRECTIVE 3810-08**

Notification of Proposed Verification Visit Under the NAFTA  
**SECTIONS 6.7 and 6.8**

**CUSTOMS DIRECTIVE 3810-10**

Issuance of Origin Determinations Under the NAFTA

**ANNEX 6**  
**CANADA**  
**6.1 Types of Verifications**

Article 506, paragraph 1 of the NAFTA states that a verification may be conducted solely by means of: written questionnaires to an exporter or producer in the territory of another Party; visits to the premises of an exporter or producer in the territory of another Party to review the records and observe the facilities used in the production of the good; and such other procedure as the Parties may agree. The Uniform Regulations For The Interpretation, Application, and

Administration of Chapters Three (National Treatment and Market Access For Goods) and Five (Customs Procedures) Of The North American Free Trade Agreement (Chapter 5 Regulations) state that these other procedures may involve: a verification letter that requests information from the exporter or producer of the good in the territory of another Party; or any other method of communication customarily used by the customs administration of the Party in conducting a verification.

Verifications can be categorized by the preference criterion which is applicable to the good. That is, there are verifications of: goods identified as wholly obtained or produced in the territory; goods subject to a tariff change and/or a regional value content requirement; and goods identified as produced exclusively from originating materials.

At this point, it may be beneficial to draw a distinction between verifications conducted by the regional offices and verifications conducted by the Origin Audits Unit.

Verifications conducted by the regional offices usually involve cases where the goods are identified as goods wholly obtained or produced in the territory of one or more of Parties, where the goods are produced entirely from originating materials in the territory of one or more of the Parties, or where the claimed origin criterion applicable to the goods only involves a tariff change requirement, as outlined in Schedule 1 of the Rules of Origin Regulations. When these verifications require an on-site visit, the regional officer may observe the manufacturing or assembling process and review the relevant books and records to ascertain the origin of the materials used in the production of the goods and to gather other information required to determine the origin of the goods.

Verifications conducted by the Origin Audits Unit usually involve a regional value content requirement and/or complex issues such as inventory management systems reviews and tracing for automotive goods. These verifications involve a detailed examination of all books and records pertaining to the origin, purchase, costs and value of, and payment for, the goods in question; all components and materials forming part of the goods in question; the inventory management control system; and, the process involved in the production of the goods in question to the point where they are ready for export to the territory of the other Party.

A verification that does not result in a visit to the premises of the exporter or producer is referred to as a desk review. There exists a verification program which contains the recommended procedures for a desk review conducted by the Origin Audits Unit of a good subject to preference criteria B.

The remainder of the Canadian sections in this chapter focuses on the methodology used by the Origin Audits Unit when conducting verifications at the premises of the exporter or producer.

## **6.2 Identification and Selection of Goods for Verification:**

Since, as explained in section 6.1, both the Regional Offices and the Origin Audits Unit initiate and conduct verifications, the identification and selection for verification would vary according to preference criteria being claimed. Reasons for selection include an obviously incorrect origin criteria identified on the Certificate of Origin, complex products with complex rules of origin, and products considered risky in terms of satisfying the rules of origin. As well, the Origin Audits Unit also responds to referrals for a thorough on-site verification of books and records, and often, in this situation preliminary verification work has already been completed. This is elaborated on below.

However, when a company is initially selected for verification, origin questionnaires are used to assist Canada Customs in collecting the information required to verify that a good qualifies for the preferential tariff treatment. General questionnaires are currently being developed, however, specific questionnaires exist for the following criteria:

- Goods Wholly Obtained or Produced Entirely in the Territory of One or More of the Parties;
- Goods Produced Entirely in the Territory of One or More of the Parties Exclusively From Originating Materials;
- Tariff Change;
- Regional Value Content - Transaction Value Method; and
- Regional Value Content - Net Cost Method.

These questionnaires are sent to the exporter or producer following the procedures set out in the Chapter 5 Regulations, who is then asked to complete and return it to the Department. Based on a review of all of the information received, the officer will make a decision as to whether the product does or does not satisfy the rules of origin or whether a more in-depth review is required.

The Origin Audits Unit receives referrals for verifications initiated by the regional offices in those situations where the rule of origin includes a Regional Value Content requirement, and there is a high risk associated with the case (such as a marginal Regional value content percentage). Other sources of referrals, on a less frequent basis, are industry complaints from Canadian companies questioning whether their competitors are entitled to the NAFTA preferential rates of duty; tariff analysis of high volume; high risk importation; and referrals from the Intelligence Section of the Enforcement Directorate questioning entitlement based on their separate analysis.

Subsequent to a good being identified and a questionnaire being sent out by the Department a preliminary risk analysis of the company's response to a questionnaire is performed by the Origin Audits Unit to determine whether the good should be the subject of an on-site origin verification. For those situations in which an on-site origin verification is considered to be necessary, priorities are set to determine which verifications should be done first. The following criteria are relied upon to set the on-site verification priority:

- i. an industry complaint;
  - ii. revenue risk to the Department;
  - iii. interest expressed by Senior Management;
  - iv. outstanding B2 refund claims attached to the request for verification from a regional office;
  - v. availability of resources (auditors), including matching the more experienced auditor with the more complex assignment;
  - vi. compliance history by companies to Customs requirements;
  - vii. difficulties/complexities of the company/industry affected by verification;
  - viii. length of time a referral has been awaiting verification action, and
  - ix. other factors (such as providing guidance to field officers).
- Currently, industry complaints are given first priority due to the sensitivity usually involved and the level of responsiveness that is expected. Other verifications are ranked according to ii., iii., iv., and v. above. Factors vi. and vii. will impact on the ranking but to date have not significantly affected the priorities.

### **6.3 Notification to Relevant Parties**

Once it has been determined that a particular exporter/producer will be subject to an on-site origin verification, all relevant parties are identified and notified that an origin verification will be conducted with respect to the specific goods under review. The parties subject to notification are as follows:

- i. Exporter/Producer:

The exporter/producer is initially contacted by telephone to arrange for an on-site visit and to ensure co-operation with regard to access to the relevant records, a guided plant tour upon the verification team's arrival and the availability of company officials to meet the auditors' requests during the course of the verification.

The exporter or producer will be sent a notice of the Department's intention to conduct a verification, by certified mail. Written consent must be given by the exporter or producer within 30 days of receipt of the notification. If the written consent is not received by Revenue Canada officials, a written determination with a notice of intent to deny preferential tariff treatment to the Canadian importers will be sent to the exporter or producer, allowing the exporter or producer 30 days in which to provide consent for a verification to the Department before denying preferential tariff treatment.

ii. Importers:

All known Canadian importers who have imported goods from the exporter or producer are identified and notified in writing that the origin of the goods is under review. Once the verification is completed, all known importers, including those who have begun to import from the exporter or producer during the course of the verification, will also be notified of the verification results. It should be noted that, generally the reassessment period commences with the date the importers are notified should it be determined that the goods under review do not qualify for the preferential rate of duty.

iii. Regional Customs Offices

The regional offices are informed of the upcoming review of certain products produced by the exporter/producer in an attempt to avoid further questionnaires from being sent to the exporter/producer during the course of the verification. Regional offices are provided with a complete commodity description which includes a description of the product and the tariff classification of the product to the six-digit level.

iv. Other Interested Parties

A notification by way of facsimile or certified mail is sent to representatives of Mexican or U.S. Customs prior to sending the notifications to the exporter/producer, importers and Customs regional offices.

When a desk review is being performed, the exporter/producer, as well as the importers, are notified of the initiation of the verification.

## **6.4 Planning**

The planning stage includes the following activities:

- i. Analysis of the response to the Regional Value Content Questionnaire
- ii. Collection of additional information from the exporter/producer that would assist in the preparation for the on-site visit to ensure efficient use of the time spent at the company's location. A request for additional information may require completion of the Statement of Cost Accounting Practices Questionnaire.
- iii. Collection of other customs information from Departmental resources (ie. Facilities Information Retrieval Management System (FIRM), Technical Reference System (TRS)), such as the volume and value of importations affected by the verification.
- iv. Collection of information from library reference material on the industry sector to identify the significance of the verification.
- v. Collection of information from the Intelligence Section, Investigations Section and the Valuations Division with respect to the product and/or exporter/producer under review.
- vi. An Assignment Planning Memorandum is developed for each exporter/producer verification. The purpose of this memorandum is to have a written plan with respect to the performance of the verification, which is approved by management and available to each member of the team. This also provides the audit manager with the background information required when providing

assistance to the team, especially during the on-site visit. It is preferable to management that the structure of the planning memorandum remains consistent from one verification to another, however, the content for each planning memorandum will vary with the different types of products/industries under review, the complexity of the issues, and the verification concerns.

The typical planning memorandum contains the following sections:

- i. Verification Objectives
- ii. Scope of the Verification - (period and products/use of representative models)
- iii. Team Members
- iv. Assignment of Responsibilities - (referenced to verification programs)
- v. Milestones - (verification planning dates, verification visit dates, file completion, evaluation and report target dates, total estimated hours for completion)
- vi. Reasons for Verification Selection - (applicable rule of origin, regional value content submission, duty differential, revenue risk)
- vii. Overview of the Company Being Reviewed - (general information, primary contact, plant statistics, annual sales to Canada, subsidiaries and/or related companies, fiscal year, cost accounting method)
- viii. Verification Concerns - (sensitivity of eligibility, intermediate materials, fungible materials, related suppliers, etc.,)
- ix. Conduct of the Verification - (guidelines, responsibilities, interviews, working papers standards, disposition of verification findings)
- x. Assessment Process - (responsibility, assessment period)
- xi. Specific References for the Verification - (NAFTA, Departmental Memorandums, Customs Act)
- xii. Detailed Verification Programs - non-qualifying operations, tariff classification, Regional Value Content (transaction value method or net cost method), transshipment, and tariff treatment.
- xiii. Agenda of items to be discussed in the opening interview.

The verification programs document the specific verification procedures to be undertaken in order to fulfil the verification objectives. There is a verification program for each major part of the verification. The verification program(s) for each verification are developed incorporating the recommended verification procedures (Refer to Chapter 5, section 5.5 for the detail on the Recommended Verification Procedures).

The planning phase requires approximately three weeks to complete.

Those procedures for verifications which remain a desk review will follow the verification program for a desk review. A desk review may also require a request for additional information from the exporter / producer.

### **6.5 On-site Verification**

This phase of the verification process includes:

- An **opening interview** with company officials to explain the objectives of the verification;
- The **execution of the verification procedures**, as documented in the Assignment Planning Memorandum prepared in the planning stages of the verification;
- The **preparation of working papers** in accordance with verification standards; and
- An **exit interview** with company officials to discuss verification findings and their impact on the NAFTA eligibility of the product shipped to Canada.

Specifically, during the on-site visit, the team will conduct tests and procedures considered necessary to determine that:

- i. all parts originating in a non-NAFTA country have been identified;
- ii. all parts originating in a non-NAFTA country have been sufficiently transformed during

- processing so as to undergo the necessary tariff change as required by the specific rule of origin;
- iii. the value of materials have been calculated in accordance with the NAFTA;
  - iv. the imported good into Canada does not undergo further production or any other operation outside the territories of the other parties, other than unloading, reloading, or any other operation necessary to preserve it in good condition or to transport the good to Canada.
  - v. the Regional Value Content requirement using either the net cost method or the transaction value method has been met.
  - vi. the proper NAFTA tariff treatment has been used for the imported originating goods.

Examples of tests and procedures considered necessary would be:

- a.) interviews with company personnel and external auditors;
- b.) walkthroughs of the accounting, purchasing and other systems;
- c.) evaluation of internal controls;
- d.) system testing;
- e.) reconciliation of the response to the Regional Value Content Questionnaire to the documents such as the General Ledger;
- f.) obtaining source (supporting) documents such as invoices, supplier certifications etc.;
- g.) conducting verifications of suppliers of materials. The Origin Audit Unit has developed supplier confirmation questionnaires to be used to verify the origin of a material. Three types of supplier confirmation questionnaires have been developed for different types of goods under review: the non-automotive good; the light-duty automotive good; and the heavy-duty automotive good. A supplier involved in the supplier confirmation process will receive a notification as to whether or not the material under review is an originating material. If more detailed information is required, a specific NAFTA origin questionnaire may be forwarded to the supplier. As well, an on-site visit to the supplier's premises may be required. A more detailed supplier verification will result in a more detailed written determination. All supplier verifications are conducted following the procedures set out in the Chapter 5 Regulations.

It is important to note that this type of exporter/producer verification is transaction-based as opposed to system-based and therefore a complete and thorough evaluation of the internal control system is not performed. An example of the evaluation made of internal controls is documented in a standard checklist called the Review of Policies, Procedures and Internal Controls Relative to Accounting and Management Systems.

Depending on the complexity of the verification, the on-site verification can require two to ten weeks at the premises of the exporter/producer.

## **6.6 Analysis of Information and Finalization**

The finalization stage of both desk reviews and on-site verifications involve the review of the verification file and the written determination by the Audit Manager and/or Senior Management for quality control reasons. A Verification File Completion Checklist exists to assist the team in the finalization of the file.

## **6.7 Written Determinations**

The Origin Audits Unit issues two types of written determinations: the initial written determination, and the final written determination.

The preparation of the initial written determination associated with an on-site verification takes place upon the team's return to the office and includes the organization of the verification file in addition to the writing of the determination. An initial written determination is also prepared for verifications conducted by desk review. The purpose of the initial written determination is to formally explain the verification findings to the exporter/producer and to conclude our verification as to the eligibility of the good for a NAFTA preferential tariff treatment. If the goods do not

qualify, this report will serve as a notice of the intent to deny the preferential tariff treatment. This notice allows 30 days to the exporter/producer to provide in writing comments or additional information relevant to the origin verification.

Once the 30 days allowed in the initial written determination have expired the final written determination is sent to exporter/producer. If the goods are found to be non-originating, the final written determination serves as a re-determination notice of the origin of the goods.

If the goods are determined to be eligible for a NAFTA preferential rate of duty, only one written determination will be prepared.

## **6.8 Notifications and Re-assessments / Re-Liquidations**

Once the final written determination is sent to the exporter/producer, notifications of the verification results are sent to the Canadian importers and the Canadian customs regional offices. Attached to the letters sent to the importers and customs regional offices are schedules which calculate the re-assessment applicable to each importer. Currently, the customs regional offices prepare the Detailed Adjustment Statements to invoice the importers for additional duties owing and the corresponding notice of denial to be sent to the exporter.

## **MEXICO**

### **ANNEX 6**

#### **6.1. Types of Verifications**

In accordance with NAFTA, the Direction of International Audit (DIA) may conduct a verification of origin with respect to the good that is imported into its territory by means of a verification questionnaire or verification visit to the premises of the exporter or producer.

Verifications conducted by the DIA involve cases where the goods are identified as goods wholly obtained or produced in the territory of one or more of Parties to NAFTA, where the goods are produced entirely from originating materials in the territory of one or more of the Parties to the NAFTA, or where the claimed origin criterion applicable to the goods only involves a tariff change requirement, as outlined in Annex 401. When these verifications require an on-site visit, the DIA may observe the manufacturing or assembling process and review the relevant books and records to ascertain the origin of the materials used in the production of the goods and to gather other information required to determine the origin of the goods.

Verifications conducted by the DIA also involve a regional value content requirement and/or complex issues such as inventory management systems reviews and tracing for automotive goods. These verifications involve a detailed examination of all books and records pertaining to the origin, purchase, costs and value of, and payment for, the goods in question; all components and materials forming part of the goods in question; the inventory management control system; and, the process involved in the production of the goods in question to the point where they are ready for export to the territory of Mexico.

#### **6.2. Identification and Selection of Goods for Verification:**

The DIA receives referrals for verifications from different sources such as industry complaints questioning whether some importers are entitled to the NAFTA preferential rates of duty, tariff economic trend analysis of high volume, high risk importations (i.e. products subject to quotas or antidumping or countervailing quotas, etc.), complex rule of origin goods, and referrals from other Government ministries based on their separate analysis. Currently, most of the verifications which are conducted by the DIA are self initiated and are identified through its own targeting project

system.

Subsequent to a good being identified, a preliminary risk analysis of the importer is performed by the DIA to determine whether the good should be the subject of an on-site origin verification or if a verification through questionnaire is needed. For those situations in which an on-site origin verification is considered to be necessary, priorities are set to determine which verifications should be performed first. The following criteria are relied upon to set the on-site verification priority:

- i. an industry complaint;
- ii. revenue risk to the Department;
- iii results of the analysis of the targeting project system;
- iv. availability of resources (auditors), including matching the more experienced auditor with the more complex assignment;
- v. compliance history by importers or exporters to DIA requirements of information;
- vi. difficulties/complexities of the company/industry affected by verification;
- vii. length of time a referral has been awaiting verification action, and
- viii. other factors

### **6.3. Notification to Relevant Parties**

Once it has been determined that a particular good will be subject to an origin verification, all relevant parties are identified and notified that an origin verification will be conducted with respect to the specific goods under review. The parties subject to notification are as follows: (Refer to Appendix J for examples of the notifications).

#### **I. Exporter/Producer:**

The exporter/producer is initially contacted by means of a notice of intention to conduct a verification sent by certified mail, in order to arrange for an on-site visit and to ensure co-operation with regard to access to the relevant records, a guided plant tour upon the verification team's arrival and the availability of company officials to meet the auditors' requests during the course of the verification.

The exporter or producer will be sent a notice of the DIA's intention to conduct a verification, by certified mail. Written consent must be given by the exporter or producer within 30 days upon receipt of the notification. If the written consent is not received by DIA officials, a written determination with a notice of intent to deny preferential tariff treatment to the Mexican importers will be sent to the exporter or producer, allowing the exporter or producer to provide consent for a verification to the DIA before denying preferential tariff treatment.

When the origin verification is conducted by means of an origin verification questionnaire, the first notification of intention to conduct such verification will be the origin verification questionnaire.

#### **ii. Importers**

All known Mexican importers who have imported goods from the exporter or producer are identified and requested to provide a copy of the certificate of origin. By this mean the importer is notified that the goods imported are subject to origin review.

#### **iii. Other Interested Parties**

A notification by way of facsimile or certified mail is sent to representatives of Canadian and U.S. Customs Services, 5 days prior to sending the notifications to the exporter/producer.



## **6.4 Planning**

The planning stage includes the following activities:

- i. Analysis of the response to an origin verification questionnaire (if sent).
- ii. Collection of additional information from the exporter/producer that would assist in the preparation for the on-site visit, in order to ensure efficient use of the time spent at the company's premises.
- iii. Collection of other customs information from Departmental resources, such as the volume and value of importations affected by the verification.
- iv. Collection of technical information from reference material on the industry sector.
- v. Collection of information from other divisions within the Ministry of Finance with respect to the product and/or exporter/producer under review.
- vi. An Assignment Planning Memorandum is developed for each exporter/producer verification. The purpose of this memorandum is to have a written verification, which is approved by management and available to each member of the team. This also provides all audit team members with the background information required while conducting the on-site visit. The content for each planning memorandum will vary depending upon the different types of goods under review, the complexity of the specific rule of origin applicable to the goods subject to verification and addresses all verification concerns and the application of verification procedures.

The typical planning memorandum contains the following sections (Refer to Appendix L):

- i. Verification Objectives
- ii. Scope of the Verification (period and goods)
- iii. Team Members
- iv. Assignment of areas under review to verification team members (referenced to verification programs)
- v. Schedules (verification planning dates, verification visit dates, file completion, evaluation and report target dates)
- vi. Reasons for Verification Selection (applicable rule of origin, revenue risk, etc.)
- vii. Overview of the Company Being Reviewed - (general information, primary contact, subsidiaries and/or related companies, fiscal year, cost accounting method)
- viii. Verification Concerns - (accumulation, intermediate materials designation, fungible materials, related suppliers, etc.,)
- ix. Guidelines, responsibilities, interviews to be made, working papers standards
- x. Specific References for the Verification - (NAFTA, Departmental Memorandums, Internal legislation)
- xi. Detailed Verification Programs - non-qualifying operations, tariff classification, Regional Value Content (transaction value method or net cost method), transshipment, and tariff treatment.
- xii. Agenda of items to be discussed in the opening interview.

The verification programs document the specific verification procedures to be undertaken in order to fulfill the verification objectives. The verification program(s) for each verification are developed incorporating the recommended minimum verification procedures (Refer to Chapter 5, section 5.5 for detail on the Recommended Verification Procedures). Depending upon the circumstances and the verification findings, in some instances, the verification procedures included in the verification programs may vary. All changes to the verification procedures developed during the planning phase of the verification must be indicated in the working papers, stating the reasons that originated such changes.

## **6.5 On-site Verification**

This phase of the verification process includes:

- An opening interview with company officials to explain the objectives of the verification (refer to

Appendix L);

- The execution of the verification procedures, as documented in the Assignment Planning Memorandum prepared in the planning stages of the verification;
- The preparation of working papers in accordance with verification standards; and
- An exit interview with company officials to discuss verification findings and their impact on the NAFTA eligibility of the product imported to Mexico.

Specifically, during the on-site visit, the team will conduct tests and procedures considered necessary to determine that:

- i.all materials originating in a non-NAFTA country have been identified;
- ii.all materials originating in a non-NAFTA country have been sufficiently transformed during processing so as to undergo the necessary tariff change as required by the specific rule of origin;
- iii.the value of materials have been calculated in accordance with the NAFTA;
- iv.the imported good into Mexico does not undergo further production or any other operation outside the territories of the other parties, other than unloading, reloading, or any other operation necessary to preserve it in good condition or to transport the good to Mexico
- v.the Regional Value Content requirement using either the net cost method or the transaction value method has been met.
- vi.the proper NAFTA tariff treatment has been used for the imported originating goods.

Examples of tests and procedures considered necessary would be:

- a) interviews with company personnel and external auditors;
- b)walkthroughs of the accounting, purchasing and other systems;
- c)evaluation of internal controls;
- d)system testing;
- e)when applicable reconciliation of the response to the Regional Value Content Questionnaire to source documents such as the General Ledger; and
- f)obtaining external confirmations from suppliers.

Depending on the complexity of the verification, the on-site verification can require two to ten weeks at the premises of the exporter/producer.

## **6.6 Analysis of the information and finalization**

The finalization stage involves the review of the verification file and the written determination by the Audit Manager and/or Senior Management for quality control reasons.

## **6.7 Written Determinations**

For the initial written determination for each party please refer to Appendix A.

The preparation of the initial written determination takes place after the verification team left the auditee's premises and includes the organization of the verification file. The initial written determination's purpose is to formally explain the verification findings to the exporter/producer and to conclude the verification as to the eligibility of the good. If the goods do not qualify this report will serve as a notice of the intent to deny preferential tariff treatment. This notice allows 30 calendar days to the exporter/producer to provide in writing comments or additional information regarding the eligibility of the good. (Refer to Appendix N)

Once the 30 days allowed in the initial written determination have expired the final written determination is sent to exporter/producer. If the goods are found to be non-originating, the final written determination serves as a re-determination notice of the origin of the goods. (Refer to Appendix N)

## **6.8 Notifications and Re-assessments/Liquidation**

Once the final written determination is notified to the exporter/producer, notifications of the verification results are sent to the Mexican importers in the terms stated in article 48 of the Fiscal Federal Code.. Appendix N contains samples of initial and final written determination and Appendix O contains a sample notification of the verification results used to notify the importers.

The importer has a 15 labor day period in which can provide in writing any additional comment or information regarding the content of the final origin determination.

Once the 15 labor day period is expired, or the importer does not demonstrate that the good subject to verification qualifies, a reassessment letter is notified to the importer detailing the duties owed, indexation surcharges, etc.