

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

**U.S. Customs and Border Protection (CBP)  
Washington, DC**

**March 1, 2017  
9:00 a.m. – 1:00 p.m.**

# Committee Welcome and Roll Call

**CBP:**       **Valarie Neuhart**, Acting Director  
Office of Trade Relations  
Office of the Commissioner  
U.S. Customs and Border Protection

# Opening Remarks

**CBP:** **Kevin McAleenan**, Acting Commissioner,  
U.S. Customs and Border Protection

**Treasury:** **Timothy Skud**, Deputy Assistant Secretary  
Tax, Trade and Tariff Policy, Department of the Treasury

**DHS:** **Christa Brzozowski**, Deputy Assistant Secretary  
Trade Policy, Foreign Investment & Transport Security

**ICE:** **Daniel Ragsdale**, Deputy Director  
U.S. Immigration and Customs Enforcement

**COAC:** **Vincent Iacopella**, Member  
**Julie Ann Parks**, Member

# Trade Modernization Subcommittee

## CBP:

**Jeffery Nii**, Director, Interagency Collaboration Division, Trade Policy and Programs, Office of Trade

**David Dolan**, Director, International Organizations & Agreements, Office of International Affairs

**Sherri Jordan**, Director, Financial Systems Division, Office of Finance, Financial Operations Directorate

**Alice Kipel**, Executive Director, Regulations and Rulings, Office of Trade

**Michael Walsh**, Director, Intellectual Property Rights & E-Commerce Division, Trade Policy and Programing, Office of Trade

## COAC:

**Lenny Feldman**, Member

**Cindy Allen**, Member



# **Trade Modernization Subcommittee Recommendations**

## **International Engagement and Trade Facilitation**

### **Recommendation #1**

#### **Leverage Advances from Prior Free Trade Agreements (FTAs): COAC**

recommends that CBP work with the appropriate U.S. government stakeholders and the private sector to review the text of more recent trade agreements to adopt modernized provisions, particularly in the areas of simplified rules of origin, importer self-certification, trade facilitation, enforcement, supply chain security, and non-tariff trade barriers.

### **Recommendation #2**

**Continuity in Trade Preferences:** NAFTA currently benefits U.S. exporters, U.S. importers, and consumers and it should continue to maintain trade preferences that provide a significant positive economic impact to U.S. workers and the long-term investments of our companies. COAC recommends CBP work with the appropriate U.S. government stakeholders and the private sector to ensure there is a continuity of trade preferences, that tariffs not increase and non-tariff barriers continue to be reduced, and that positive U.S. trade and investment persists with our NAFTA partners.

# Trade Modernization Subcommittee Recommendations

## International Engagement and Trade Facilitation

### **Recommendation #3**

**Consistency in Implementation:** In order to improve the consistency of NAFTA treatment to the same goods within the NAFTA region, COAC recommends that CBP work with Canada and Mexico to establish standardization in NAFTA trade preference qualification and consistent enforcement.

### **Recommendation #4**

**North American Single Window:** In another effort to simplify trade for all businesses, particularly small and medium sized businesses, the COAC recommends CBP work with Canada and Mexico to collaborate on cross border data sharing and data harmonization, remove or modernize unnecessary regulatory barriers within the North American Region through the use of a single window. (See COAC recommendations from the 1 USG subcommittee's North American Single Window Alignment working group delivered at the November 17, 2016 COAC meeting)

# Trade Modernization Subcommittee Recommendations

## International Engagement and Trade Facilitation

### **Recommendation #5**

**Regulatory Cooperation:** For products that are subject to partner government agency regulations, COAC recommends that CBP work with U.S. partner government agencies in the U.S. as well as Canada and Mexico to streamline and harmonize those regulations to create alignment in regards to documentation and data requirements, inspections, and enforcement in order to facilitate cross border trade within the NAFTA region for those regulated commodities.

### **Recommendation #6**

**E-Commerce and Innovation:** COAC recommends that CBP work with the appropriate U.S. government stakeholders and the private sector to ensure that NAFTA or other FTA reflects the need for modernization of regulations impacting the e-Commerce business model, including areas of admissibility, targeting, and partner government agency regulations. The goal would be to streamline regulatory requirements and improve enforcement.

# Trade Modernization Subcommittee Recommendations

## International Engagement and Trade Facilitation

### Recommendation #7

#### **De Minimis Harmonization and U.S. Export Facilitation:** COAC

recommends that CBP work with Canada and Mexico to achieve a commercially significant *de minimis* level, which reflects the modern reality of online commerce. The U.S. has a *de minimis* value of \$800, which is the value at which companies pay no duties or tariffs. Canada has a *de minimis* value of \$20, and Mexico is \$50.

### Recommendation #8

**Express Delivery Services (EDS):** Since NAFTA was established, the U.S. has negotiated numerous FTAs with other countries. Newer agreements include provisions to harmonize the clearance and movement of goods in the EDS industry. COAC recommends that CBP work with U.S. government stakeholders to ensure NAFTA includes modern provisions with specific focus on the facilitation and streamlining of EDS shipments.

# **Trade Modernization Subcommittee Recommendations**

## **International Engagement and Trade Facilitation**

### **Recommendation #9**

**Beyond the WTO Trade Facilitation Agreement (TFA):** In many areas, NAFTA countries have gone beyond the TFA, and we should use this opportunity to promote regional competitiveness. COAC recommends CBP work with Canada and Mexico to utilize prior FTAs trade facilitation chapters as a baseline to create a higher standard to support how modern borders should operate in the NAFTA region.

# Trade Modernization Subcommittee Recommendations

## Draft Recommendations on Revenue Modernization:

### Recommendation #1

**Duty, taxes and fees:** The COAC recommends that CBP consolidates port specific daily and monthly formal entry statements, to one monthly statement, inclusive of all statements from all ports of entry nationwide.

### Recommendation #2

**Duty, taxes and fees, single entry and post entry reconciliation via 28s, 29s, PSCs, liquidated damages, rate advances and supplemental duty payments at liquidation:** The COAC recommends that any form of payment currently processed manually such as duties, taxes and fees, single entries, reconciliation (NAFTA or Value), post entry adjustments via 28s, 29s, post summary corrections, liquidated damages, rate advances, and supplemental duty payments at liquidation, and/or voluntary tenders should be automated and available via ACE ABI, ACE AMS, the ACE Portal and Pay.gov. This payment process should anticipate importers as individuals, corporations as filers, brokers as filers and Surety when paying on behalf of the importer and/or bond principal.

# Trade Modernization Subcommittee Recommendations

## Draft Recommendations on Revenue Modernization:

### Recommendation #3

**All Fees:** The COAC recommends that CBP regulations be updated to accept electronic payments.

### Recommendation #4

**Broker Fees:** The COAC recommends that individuals or companies who hold Customs Broker Licenses be able to make payments through ACE for all brokerage related fees. This would include individual license holders, employers paying on behalf of the individual, and the company to pay fees on their own behalf through ACE or ACE portal, singly or combined.

### Recommendation #5

**Informal Entries:** The COAC recommends that CBP create the ability for express consignment operators' brokers to pay duties, taxes, and fees electronically for daily consolidated informal entry filings, replacing manual check payments. See Great Idea Form (GIF) titled "Consolidated Informal Entry Summary (Courier Entries)."

# Trade Modernization Subcommittee Recommendations

## Draft Recommendations on Revenue Modernization:

### Recommendation #6

**Truck Crossing Fee:** The COAC recommends that CBP requires that all carriers submit an eManifest through ACE prior to crossing. In addition, the Working Group recommends that an ACE application allows for the set-up of a deposit account to be linked to an eManifest so pre-payments may be automatically debited from the account based on the eManifest. Users should be able to view the detail and history of their financial transactions in the common ACE platform.

### Recommendation #7

**Truck Crossing Fee:** The COAC recommends that CBP leverage the RFID technology, including on FAST cards, to collect single entry payments.

### Recommendation #8

**Truck Crossing Fee:** The COAC recommends that truck carriers have the ability to view a detail and history of their DTOPS-related transactions via access through the ACE portal, including all transactions associated with payments based on eManifest.

# **Trade Modernization Subcommittee Recommendations**

## **Draft Recommendations on Revenue Modernization:**

### **Recommendation #9**

**Truck Crossing Fee / APHIS/ CBP User Fee / Tonnage:** The COAC recommends that CBP create a smart phone app to provide a more efficient way of pre-paying fees, to reduce lines at the border. Carriers, couriers or travelers could show their receipts on their smart phones at primary inspection sites, decreasing border processing times.

### **Recommendation #10**

**Express Consignment Fee (Low Value Shipment Fee):** The COAC recommends that since shipment manifests contain the breakdown of cargo by entry type and payment, it could be used to bill express consignment couriers for their express consignment fees, rather than the fee being self-reported. Alternatively, couriers could use a pre-paid account in ACE portal to pay for Express Consignment Fees.

# Trade Modernization Subcommittee Recommendations

## Draft Recommendations on Revenue Modernization:

### Recommendation #11

**Ocean Fees:** The COAC recommends that CBP consider providing an incentive for ship agents and/or carriers to move toward e-payments. If it is a current regulatory option to allow for payment by cash and/or check, there should be an incentive provision for e-payment on line. This should be in the form of an allowance for the ship agent / payer to be granted 48 hours following the vessel's arrival to make payment if done via one of the approved e-payment methods.

### Recommendation #12

**Overtime Reimbursable Fee:** The COAC understands the current complexity of the calculation of overtime fees as well as the difficulty to calculate these at the time the service is provided. The COAC recommends that the regulations be changed to simplify the current process and allow a more flexible method of overtime assessment, which would meet both CBP and Trade requirements. This would eliminate a significant amount of work for CBP in calculating the overtime required, and for industry who would be able to determine the due amount based on a defined rate, facilitating ease of payment. At such time as the regulation/s could be changed for the overtime calculation, it is recommended that payment of overtime be added to the fees collected via the Mobile Collection Receipts (MCR) application.

# **Trade Modernization Subcommittee Recommendations**

## **Draft Recommendations on Revenue Modernization:**

### **Recommendation #13**

**PGA Fees:** The COAC recommends that CBP, through ACE single window, create the ability for fees associated with Partner Government Agencies (PGA) processing services be automated (i.e., Fish and Wildlife (F&W) overtime clearance fees and USDA annual permits).

# Trade Modernization Subcommittee Recommendations

## Rulings and Decisions Improvement:

### Resource Allocation

#### **Recommendation #1**

COAC recommends that in light of the foreseeable, imminent shifts in U.S. trade and border policy, CBP should ensure that R&R possesses the necessary resources to maintain trade and other critical subject matter priorities despite other issues that may become of significant concern. COAC also feels this is necessary due to the Administration's mandate to eliminate two regulations for every one regulation that the Government issues.

#### **Recommendation #2**

In order to expedite and facilitate the review and approval of rulings and decisions, COAC recommends CBP and R&R undertake a review of its work process and organizational structure to optimize its resources particularly to ensure that it operates at a sufficient supervisor to attorney ratio. The ratio should be a key consideration in the organization of R&R. For instance the Tariff Classification and Marking Branch has one supervisor for nineteen (19) employees and presently covers subject matter that four branches previously handled.

# Trade Modernization Subcommittee Recommendations

## Rulings and Decisions Improvement:

### Communication and Outreach

#### **Recommendation #3**

COAC recommends that until the rulings submission process is fully automated, R&R should provide a template and/or checklist to the Trade to help ensure ruling requests and protests include all vital information needed for R&Rs deliberation.

#### **Recommendation #4**

COAC recommends that R&R conduct outreach, as resources permit, at association events and via webinars to clarify the type of information and best practices the Trade should consider when requesting a ruling or decision.

#### **Recommendation #5**

To enhance consistency and uniform decision making, COAC recommends that R&R take steps to ensure robust internal communication between R&R and the Centers to convey significant, pending R&R matters, using to the extent possible, electronic means.

# Trade Modernization Subcommittee Recommendations

## Rulings and Decisions Improvement:

### Process Improvement & Efficiencies

#### **Recommendation #6**

COAC recommends, as is specified in the Trade Facilitation and Trade Enforcement Act (TFTEA), that CBP should encourage bi-directional training that enhances R&R subject matter expertise. CBP should support and encourage greater participation of R&R attorneys in training programs that are provided to Centers and/or Port personnel. R&R attorneys should also take advantage of training offered by universities, trade associations or other institutions.

#### **Recommendation #7**

In order to enhance and/or facilitate R&R technical expertise and greater exposure to operational matters, R&R should consider placing R&R attorneys, on a temporary duty basis, in the Centers and/or ports. This should enable R&R to be more interactive with the Centers and/or ports, and could be done on a virtual basis, provided that the necessary electronic environment between R&R and Centers and/or ports is made available.

# **Trade Modernization Subcommittee Recommendations**

## **Rulings and Decisions Improvement:**

### **Recommendation #8**

COAC recommends, to assist in alleviating the backlog of rulings, that R&R consider offering a new option for the protestant to request an expedited sixty (60) day Application for Further Review (AFR) decision that would not result in a written published decision by R&R but would merely instruct the Center to grant or deny the protest. The use of this process would be at R&R's discretion and would be considered for future as well as pending AFRs.

### **Recommendation #9**

COAC recommends that in order to expedite the issuance of substitution drawback rulings under the Trade Facilitation and Trade Enforcement Act (TFTEA), R&R should leverage the expertise of the National Commodity Specialist Division (NCSD) as appropriate.

# Trade Modernization Subcommittee Recommendations

## Rulings and Decisions Improvement:

### Automation, Innovation & Visibility

#### **Recommendation #10**

COAC recommends that CBP and R&R devote resources to develop an automated process/system for the submission, processing and dissemination of all types of ruling requests and decisions.

#### **Recommendation #11**

COAC recommends that CBP provide funding for R&R to develop a web based, end to end case management system. This system should contain functionality that, at a minimum: receives the submission of ruling requests, creates records of such inquiries, enables the submitting party to check status and receive major milestones of case processing, records and disseminates and publishes the ruling or decision once the ruling or decision is final.

In the interim R&R should notify the inquiring party of major milestones including: case received, case assigned, awaiting information, in process, and decision rendered.

Leveraging current document imaging functionality, R&R should provide a mechanism to receive ruling requests electronically via email and once the decision or ruling is rendered, email a copy to the inquiring party.

# **Trade Modernization Subcommittee Recommendations**

## **Rulings and Decisions Improvement:**

### **CROSS Rulings Database**

#### **Recommendation #12**

COAC recommends that R&R, in conjunction with OIT, research what enhancements could be made to the CROSS system search and notification/alert features, as commercially permissible.

### **Binding Ruling Requests & Reasonable Care**

#### **Recommendation #13**

COAC recommends that its proposed Mitigation Guidelines Working Group address with R&R whether the pendency of a response to a prospective ruling request affects a determination as to whether the submitter exercised reasonable care.

# Public Comment Period

Please send in your comments or questions via the Chat box in the webinar.

Your comments will be read into the public record and CBP will respond during the public comment period noted on the agenda if time permits.

# One U.S. Government Subcommittee

**Special Guests:** **William Woody**, Chief, U.S. Fish and Wildlife Service  
**Sheila Einsweiller**, Senior Wildlife Inspector, U.S. Fish and Wildlife Service

**CBP:** **Jeffery Nii**, Director, Interagency Collaboration Division  
Trade Policy & Programs, Office of Trade  
**Kimberly Marsho**, Director, Communications and  
Training, Trade Transformation Office, Office of Trade  
**Robert McMullen**, Executive Director,  
Office of Information Technology

**COAC:** **Amy Magnus**, Member  
**Madeleine Veigel**, Member



# Public Comment Period

Please send in your comments or questions via the Chat box in the webinar.

Your comments will be read into the public record and CBP will respond during the public comment period noted on the agenda if time permits.

# Export Subcommittee

**CBP:**        **Jim Swanson**, Director, Cargo Security and Controls, Cargo and Conveyance Security, Office of Field Operations

**Kimberly Marsho**, Director, Communications and Training Trade Transformation Office, Office of Trade

**COAC:**        **Elizabeth Merritt**, Member  
**Heidi Bray**, Member

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 1

With regard to the data element “Name of Exporter”: The exporter is not a party that is captured by transportation documents or carrier manifests.

- Therefore, it is recommended that CBP change the name of this data element name to "shipper name".

Additionally, the US definition of shipper is not in line with the WCO definition for the equivalent data element "consignor", nor with the Canadian definition of “shipper”, both of which designate the proper party to be that which is shown on the bill of lading / shipping document / transport contract.

- We recommend that CBP change its definition of shipper name to “the name of the party shipping the goods as shown on the Bill of Lading (BOL)/shipping document.” This recommendation applies to the manifest systems, import and export, for all modes of transport.
- Furthermore, because truck BOLs are not standardized, we recommend that CBP provide guidance regarding which of the potential fields on a truck BOL contains the proper party to be submitted as the shipper element.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 2

- As the next step of the process, we recommend that CBP clearly delineate and define all truck export manifest data elements such that they are suitable for determining IT requirements, and develop a comprehensive explanatory spreadsheet of the US export manifest data elements that also references them to the import manifest data elements of Canada and Mexico.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 3

It is understood that CBP may wish to allow or encourage – and potentially in the future even require – the submission of additional data elements. However, it is problematic when CBP makes provision for such new elements by expanding the definition of an existing data element, instead of creating a new data element with its own clear definition.

One example is the shipper data element, the definition of which has been proposed to include “an identification number that will be a unique number to be assigned by CBP upon the implementation of the Automated Commercial Environment”. However, a carrier is unlikely to find this future CBP identification number in the shipper name field of the transport document. Similarly, with the data element “Cargo Description”, along with “detailed description of the cargo”, CBP has also included in the definition the 6-digit level of the Harmonized Tariff Schedule. But a plain language description of the goods and an HTS classification are two different things.

We believe that this “definition expansion practice” leads to a lack of clarity in data element definitions, is a hindrance to international harmonization, and is impractical with regard to IT programming and cargo documentation practices.

- We therefore recommend that, as a standard future practice, if CBP wishes to provide filers the option of transmitting additional information, that this information be delineated as new, clearly-defined data elements. This recommendation applies to the manifest systems, import and export, for all modes of transport.
- With regard to specific truck manifest data elements, we recommend that CBP remove 1) the identification number item from the definition of shipper and 2) the HTS reference from the definition of cargo description, and instead include them as a separate, new, optional data element to be provided in new, separate fields of a message.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 4

With regard to the data element of “consignee”, the carrier has information on only one party: that who is listed on a transportation bill as the consignee.

- We therefore recommend that CBP delete the truck export data elements “ultimate consignee” and “intermediate consignee”, and replace these with a single data element: “consignee”.
- We further recommend that this “consignee” data element should be defined in alignment with the WCO SAFE Framework and Canada e-manifest definitions of “consignee” as the name of the party to whom the cargo/goods are being "shipped to" or “consigned” as shown on the Bill of Lading or shipping document. This recommendation applies to the manifest systems, import and export, for all modes of transport.
- Similar to “shipper” above, because truck BOLs are not standardized, we recommend that CBP provide guidance regarding which of the potential fields on a truck BOL contains the proper party to be submitted as the consignee element.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 5

With regard to the data element “Name and Address of the Notify Party”, CBP has defined this as “the name and address of the party to be notified as specified in the carrier's/freight forwarder's contract of carriage or commercial sales.” The carrier, however, does not have access to commercial information.

- We therefore recommended that CBP remove any reference to commercial sales documentation from the definition. Furthermore, customers do not always provide a notify party, therefore this data element should be designated as "conditional", with further delineation needed regarding when it is mandatory.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 6

- With regard to the data elements “Port or Place of Unloading” and “Place where the cargo was accepted”, we recommend that CBP define these in alignment with similar Canada CBSA e-manifest data elements, and make them conditional, to be required only when these places differ from the information provided in the consignee field for place of unloading, or the shipper field for place where the cargo was accepted.

### Recommendation 7

- With regard to the data element carrier code, we recommend that CBP coordinate closely with CBSA to ensure that a system of "look-up" tables are in place for both manifest systems in order to translate between US and Canadian carrier codes.

### Recommendation 8

- With regard to the data element “Trip number or Unique Consignment Number”, we recommend that these be listed as two separate data elements, with the definitions aligned to those found in the Canada e-manifest system.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 9

With regard to the data element cargo quantity, it is understood that CBP wants the lowest level piece count, and that carriers should employ due diligence to transmit accurate data in this regard. However, it is sometimes impossible for a carrier to determine whether or not the piece count provided to it by a shipper is accurate.

- Therefore we recommend that, as per the Trade Act, CBP ensures that the policy interpretation of this element provides that carriers should be able to reasonably depend upon the information provided to it by shippers, and that CBP direct any enforcement actions toward shippers who are providing inaccurate information to carriers.

### Recommendation 10

- With regard to Hazmat, we recommend 1) that CBP align with the Canadian designation of the UN number as the required Dangerous Goods Code element, unless no UN # exists for the commodity involved, and 2) that the data element Chemical Abstract Service ID Number be eliminated or made optional.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 11

- With regard to the data element AES ITN or AES Filing Exemption Code, we recommend that all of the possible citations utilizing the expected codes should be provided for review.

### Recommendation 12

With regard to the data elements “license code”, “export control classification number”, and “License or Permit Number”, we note that all of these are commodity elements, not related to the transport contract that is the basis of the manifest. We also note that the Automated Export System should already capture all of these data fields attached to an ITN, therefore to also require them on the manifest would be duplicative.

- We therefore recommend that CBP remove these elements from the truck manifest data element list, and that the issuance of an ITN be used as a “one-stop shop” for validation of these and any similar commodity-related data elements. This recommendation applies to the export manifest systems for all modes of transport.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 13

- With regard to data elements related to split shipments, we recommend that CBP undertake an evaluation to determine whether the government has a compelling interest in carriers providing detailed split information, such as number of pieces on a given conveyance, on the export manifest. This recommendation applies also applies to the rail and air export manifest systems.

### Recommendation 14

With regard to promoting seamless intermodal transport, the Canadian highway e-manifest system includes a field in which the filer can provide an ocean bill of lading number. The US truck data element list does not include this field. We also note that ocean-to-truck is not the only possible intermodal transfer; particularly across the northern border, air-to-truck (and vice-versa) transfers are standard practice.

- We therefore recommend that CBP include a data field for the provision of a bill of lading identifier from another mode of transport in all of its export manifest systems, including air, ocean, rail and truck, to provide a mechanism to link together information for the same shipment that has been filed in different systems under different bill numbers.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 15

The current process by which conventional carrier air shipments exported from the US by truck are reported to customs today is inefficient and burdensome. Known as “flying trucks”, these are trucks that operate under air carrier flight numbers and carry shipments travelling under an air waybill, including shipments that have entered the United States by air and are being exported to Canada by truck, and those that originate in the United States and are exported by truck, and are then transferred onto an aircraft in Canada for export to a third country.

- As the automated truck manifest is developed, we recommend that CBP develop an airline/truck dual-filing, dual-manifest approach, in which 1) air carriers – via the Air Export Manifest System – provide CBP with data on the house and master bills departing on an airline flight-number-identified truck, and 2) truckers – via the Truck Export Manifest System – provide CBP with the required truck specific data elements, so that 3) CBP can link the two data submissions together behind the scenes.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

### Recommendation 16

Express air shipments moving multimodal (ground-to-air and air-to-ground) on trucks across the Northern and Southern Borders, commonly referred to as "Flying Trucks", are still required to stop at the border to present paper in-bond documents. This includes shipments exporting from an FTZ. The current manual processes result in inefficiencies and service delays.

There are a number of disparities/gaps in functionality today, such as

- Air Manifest-originated in-bonds can be closed in QP/WP, but QP-originated in-bonds cannot be closed in Air Manifest, and most carriers and many forwarders use only Air Manifest.
- For shipments moving entirely by air, Air Manifest can be used to electronically arrive and close all in-bonds, but this electronic capability disappears once a shipment moves to a different mode. The same “full-electronic” capability should exist in all modes of transportation, including inter-modal moves.

# Export Subcommittee Recommendations

## Truck Manifest and Multi-modal

Continued

To automate in-bond processes, full and robust ACE functionality must be adopted to open, arrive (e.g., transmit an ASN 3 message) and close/export (e.g. ASN 7 message) all transportation in-bonds, including those for shipments moving inter-modally.

- We therefore recommend that functionality be incorporated into in Air (import) Manifest, QP/WP and the new export manifest systems (air and truck) so that all in-bonds, regardless of the modal or functional (e.g., ABI versus manifest) ACE system in which they were originated, can be electronically arrived and exported. The new functionality must include the ability to create - in the manifest system - electronic in-bonds for export shipments originating from an FTZ, and the ability to use both CBP 4-digit port codes or three-letter airport codes in all ACE applications to enable creation and arrival/export of in-bonds.

# **Export Subcommittee Recommendations**

## **Truck Manifest and Multi-modal**

### **Recommendation 17**

- Keeping in mind CBP's need to conduct adequate pre-departure manifest targeting for export shipments, we recommend that CBP do all possible to preserve existing benefits for trusted traders as the truck export manifest system is developed. In particular, we recommend that account-based programs be leveraged to preserve the exemption for pre-departure manifesting for trusted trader participants in the Canadian Customs Self Assessment program, and that similar benefits be provided for participants in the Operadora Economica Autorizada (OEA) program for Mexico's trusted traders across the southern border.

# Public Comment Period

Please send in your comments or questions via the Chat box in the webinar.

Your comments will be read into the public record and CBP will respond during the public comment period noted on the agenda if time permits.

# Break

We will be taking a ten minute health break and will resume with the COAC meeting shortly.

# Trade Enforcement and Revenue Collection (TERC) Subcommittee

**CBP:**      **Troy Riley**, Executive Director, Commercial Targeting & Enforcement, Office of Trade

**Jeff Nii**, Acting Executive Director, Trade Policy & Programs, Office of Trade

**COAC:**    **Lisa Gelsomino**, Member



COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE

# Public Comment Period

Please send in your comments or questions via the Chat box in the webinar.

Your comments will be read into the public record and CBP will respond during the public comment period noted on the agenda if time permits.

# Global Supply Chain Subcommittee

**CBP:**      **Liz Schmelzinger**, Director, Customs-Trade Partnership Against Terrorism (C-TPAT), Cargo and Conveyance Security, Office of Field Operations

**COAC:**    **Adam Salerno**, Member  
              **Brandon Fried**, Member



# Public Comment Period

Please send in your comments or questions via the Chat box in the webinar.

Your comments will be read into the public record and CBP will respond during the public comment period noted on the agenda if time permits.

# Break

We will be taking a ten minute health break and will resume with the COAC meeting shortly.

# Trusted Trader Subcommittee

**CBP:**      **Liz Schmelzinger**, Director, Customs-Trade Partnership Against Terrorism (C-TPAT), Cargo and Conveyance Security, Office of Field Operations

**COAC:**    **Alexandra Latham**, Member  
              **Michael Young**, Member

# Public Comment Period

Please send in your comments or questions via the Chat box in the webinar.

Your comments will be read into the public record and CBP will respond during the public comment period noted on the agenda if time permits.

# Update on the COAC Annual Trade Efficiency Survey

**COAC:**     **Celeste Catano, Member**  
              **Mike White, Member**

# Adjourn

**COAC**

---

**COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE**