

Commercial Customs Operations Advisory Committee (COAC) Export Manifest Working Group

October 3, 2018



U.S. Customs and
Border Protection



Office of Field Operations, Cargo and Conveyance Security
Pipeline Working Group
October 3, 2018

Action Required:

- Informational Only

Background:

- The Trade Act of 2002 requires the electronic submission of the export manifest data in all modes of transportation, from the party with the most accurate information.
- The parties maybe carriers, freight forwarders, or indirect air carriers. Additionally, CBP is allowing service providers and software developers to participate in the pilots.
- In 2015 CBP announced in the Federal Register the three export manifest pilots for air, ocean, and rail manifests. Due to OMB rules only 9 participants were allowed to initially were allowed in each pilot. In 2017 the pilot was expanded to all potential users.
- Due to technical difficulties and the need to determine operational guidance, the growth of the export manifest pilot has been slow.
- The pilots for ocean, air and rail have been opened to all parties from the original limit of 9. In addition, the time frame for the pilots have been extended to allow for growth.

Issue:

- CBP is committed to establishing a process for the submission of advance electronic manifest information for exporting carriers.
- The Office of Field Operations is finalizing a Business Process Document for export manifest based on input from the CBP Commercial Operations Advisory Committee and other working groups both business and technical.
- The Business Process Document will include guidance in the following areas:
 - Data Elements - COAC recommendations have been largely accepted for mandatory, conditional and optional data elements and their definitions. New data elements have been agreed upon and implemented including the exemption and exception codes recommended by COAC.
 - Data Submission Process and Timeframes – CBP has agreed to the progressive filing concepts provided by COAC for incremental filing based upon ownership of data. For example house bill filers will submit independently of master bills and conveyance departure information. House bill submissions are expected as early as possible but should be filed no less than 4 hours prior to departure. At this time, CBP will allow for shorter timeframes prior to departure for the remaining filers in order to evaluate the appropriate filing timelines that fit with business models.
 - Targeting Protocols – CBP will work to provide a more national targeting process assigned to the early filing of export manifest (similar to ACAS and ISF) to allow for better segregation of higher risk shipments. CBP and filers have reached agreement that this will be the primary method but that some local targeting will still be required as information develops or based on local knowledge. CBP will work to engage local targeters in the national targeting effort for export manifest.

- Examination Protocols – CBP will test multiple examination protocols for this effort including:
 - Port of Export examinations (as currently performed)
 - Trade selection of examination site based on designation of examination ports from CBP.
 - Requests from trade to perform examinations in trade selected ports to examine goods at the lowest possible cost prior to consolidation.
- Operational Guidance – This includes the provisions to better identify in-bond exports and the benefits accruing to electronic filers for port and date of export issues that have lead to penalties for many exporters.
- In addition to the Business Process Document, CBP has been working on a strawman for regulatory changes to mandate advance electronic export manifest for ocean, rail and air.
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Submitted by: James Swanson, Director Cargo Security and Controls OFO/CCS

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