

Commercial Customs Operations Advisory Committee (COAC)

Next Generation Facilitation Subcommittee

1USG Working Group

Global Business Identifier (GBI)

December 2019



**U.S. Customs and
Border Protection**

Global Business Identifier (GBI) Initiative

OBJECTIVE

The GBI Initiative aims to develop a systematic, accurate and efficient method for the U.S. Government (USG) to **identify foreign business entities, supply chain roles, Authorized Economic Operator (AEO) program status, and foreign addresses**. It will enable the USG to use a “common language” employed by the trade community and better position U.S. Customs and Border Protection (CBP) and partner government agencies (PGA) to **target high-risk shipments**.

BENEFITS

To Government

- **Who is Who:** globally unique record of foreign entities
- **Ownership and Affiliation:** insight into parent-subsidiary structures; common ownership
- Improved data quality and defined supply chain roles for **targeting and risk assessments**
- More robust than the World Customs Organization (WCO) **Trader Identification Number (TIN)**, but adheres to WCO TIN guidelines and allows for usage of the TIN.

To Industry

- **Trade-facing portal** maintained by third parties with established data governance and entity management procedures to update and correct information
- Globally **unique and accessible**
- Universal **sector coverage**
- Use of **identifiers that companies already possess**
- **Facilitation benefits** for participation (fewer holds, etc.)
- Allow CTPAT members to **easily verify partners' membership** in participating trusted trader programs.

PROPOSED SOLUTION

- Launch an evaluative proof of concept (EPoC) that will test the **Legal Entity Identifier (LEI)**, a 20-character identifier based on an international standard; the **Global Location Number (GLN)**, a 13-digit identifier that can be customized to indicate supply chain roles, location, functions, etc. for relevant “origin-conferring” entities; and the **Data Universal Numbering System (DUNS)**, a 9-digit randomly generated identifier that records unique business establishments, to determine the **optimal GBI solution**.
- The optimal solution would uniquely identify the main legal entity, its different business locations, their functions and supply chain roles, and ultimately **improve data quality and efficiency** for targeting, enforcement, and risk assessments.
- This EPoC will be through the **USG's Single Window** platform and volunteer participants will be required to **submit all three identifiers upon entry**.

IDENTIFIER COMPARISON

LEI	20 characters; unique to a legal entity, as determined by the certifying body in that jurisdiction.	Created / managed by Local Originating Units (LOUs) with oversight by the Global LEI Foundation (GLEIF).	<p>Accurate: Data includes registered address/corporate HQ; Date of most recent renewal; How data was verified. Charts parent-sibling relationships.</p> <p>Searchable: GLEIF website allows for key word searching and access to associated data.</p> <p>Disputable: Users can challenge data accuracy.</p> <p>Low Cost: Charge to issue LEI on cost recovery basis only. No cost to USG to access LEI data.</p> <p>Competitive: Open issuance rules allow for competition among LOUs and increases robustness of the system.</p>	<p>318700BHIA15IW21JH33</p> <p>LOU Identifier Entity Identifier Check Code</p> <p>WIDGET Export - Import 7582 Industrial Lane 69214 Chodovská radiála CZ</p>
GLN	13 digit number; Customizable to location, function, other logistics. Can be applied to products in form of a RFID-enabled bar code.	Created / managed by GS1, an international not-for-profit organization, through local GS1 Member Organizations (MO).	<p>Strong Management and Oversight: Created and managed by GS1, an international not-for-profit organization and UPC symbol pioneer. GS1 maintains detailed rules for issuance and allocation.</p> <p>Global: A GLN can be assigned by a company anywhere in the world and can be used globally.</p> <p>Flexible: A legal entity can have multiple GLNs to specify location role.</p> <p>Low Cost: No cost to USG to access GLN data. GS1 pricing schedules vary by country. No cost to companies using GS1 standards.</p>	<p>5439156581234 Widget Company Prefix Manufacturing Location for Type A Check Digit</p> <p>5439156845633 Widget Company Prefix Manufacturing Location for Type B Check Digit</p>
DUNS	9 digit number; randomly generated; identifies unique business establishments	Created / managed by Dun & Bradstreet (D&B), a private company based in the U.S.	<p>Business Location Specific: Every business location is uniquely linked to a DUNS number. Charts family tree relationships.</p> <p>Customizable: DUNS data is licensed based on number of records and type of insight, allowing for tailored subset of identifier information.</p> <p>Prevalent: D&B has data on 300 million business locations globally, with 140 million active business locations.</p> <p>Unknown Cost: Full-implementation costs to USG are unknown.</p>	<p>215 287-1450</p> <p>WIDGET INTERNATIONAL HOLDINGS LLC 618 Industry Ave Chodovská radiála, CZ 69214 Subsidiary - Active</p>