

**Commercial Customs Operations Advisory  
Committee (COAC)  
Rapid Response Subcommittee**

April 2020

**COAC**

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COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE

**Commercial Customs Operations Advisory Committee (COAC)  
April 15, 2020**

**Report of the Work of the COAC  
Rapid Response Subcommittee**

**Co-Chairs**

**Brenda Barnes – Geo. S. Bush & Co., Inc  
Brian White – The J.M. Smucker Company  
Kathy Wilkins – Alliance Operating Services**

**Rapid Response Subcommittee Members:**

Cindy Allen, Brenda Barnes, Barry Baxter, Celeste Catano, Lenny Feldman, Lisa Gelsomino, Warren Hastings, Amy Magnus, Madeleine Veigel, Brian White, and Kathy Wilkins.

**Background**

The COAC Rapid Response Subcommittee was established October 2018, following the restructuring of COAC Subcommittees and underlying Working Groups to better align with CBP's Trade Strategy 2020. This strategy focuses on four areas aimed at modernizing import/export processes, improving trade intelligence, and maximizing efficiencies.

The Rapid Response Subcommittee is an agile assembly of COAC members used to formulate new topics and address emerging issues. This Subcommittee partners with COAC members, trade and CBP to solicit input on active issues and/or emerging concerns that need to be addressed. Concerns raised and acted on by the Rapid Response Subcommittee are expected to be addressed in between the quarterly meetings when possible to ensure the group remains agile and effective. Any issues that require long term research and/or support for implementation would be brought to the COAC to determine whether the work should be added to an existing work group or a new working group should be established.

All subcommittee objectives and scope are consistent with the official charter of COAC.

**Summary of Work**

The Rapid Response Subcommittee held one conference call on January 30, 2020. The members received an update from the Continuing Broker Education Task Force and discussed the feedback the members submitted to CBP regarding the top three reasons for Continuing Education for Brokers, and the status of the notice of proposed rulemaking.

**Continuing Broker Education Task Force:** The Continuing Broker Education Task Force held a conference call on January 8, 2020 where a proposed timeline for a public notice was developed. The consensus of the Task Force continues to be that the degree of ongoing change within the trade environment has created a higher level of receptivity and support for mandatory continuing education. The Task Force is considering multiple issues including, an accreditation approach, the method and types of content that would be included, and compliance and

connection with the Triennial report. Several areas have been identified where a knowledge gap still exists. The Task Force is not anticipating another in-person for the near-term.

**USMCA Working Group:** A new Working Group has been formed as part of an implementation effort by CBP for the U.S. – Mexico – Canada Agreement (USMCA), a trade agreement that will replace the North American Free Trade Agreement (NAFTA). The first conference call was held on March 13, 2020 to discuss at a high level the goal of ensuring a smooth and extensive transition from NAFTA to USMCA. The Scope of Work has been shared with all COAC members for feedback from various industry representatives to gain an understanding of the potential impact of the USMCA implementation. The Working Group will then review the feedback and discuss next steps. Ultimately, the USMCA Working Group will leverage the Next Generation Trade Subcommittee to engage the private sector for implementation of the USMCA.

### **Conclusion**

The Rapid Response Subcommittee looks forward to continued collaboration with CBP on the Continuing Broker Education Task Force objectives. Additionally, we stand ready to support CBP in the transition from NAFTA to USMCA and their partnering government agencies to develop solutions that can address emerging issues.