

## **Virtual Trade Week: One U.S. Government (1USG) and the Global Business Identifier (GBI) Initiative Frequently Asked Questions (FAQs)**

### **Q: Would you advise importers to start collecting LEI, DUNS, and GLN for all suppliers in anticipation of this change in the Spring 2022?**

The GBI Evaluative Proof of Concept (EPoC) launching in Spring 2022 is a voluntary pilot. Obtaining the entity identifiers (DUNS, GLN, LEI) will only be required for those who are participating in the EPoC, even though many in the trade community may already possess one or more of these identifiers. That said, there are several advantages for members of the trade to participate in the EPoC, as well as benefits of obtaining the entity identifiers for business use. Advantages and benefits may include: the opportunity to test the GBI and provide feedback on the EPoC; ownership of business entity identifiers that are globally unique, adhere to international standards, and provide a global digital identity; and early possession of the entity identifiers in the event the GBI becomes mandatory. Additional operational benefits of each entity identifier can be found on GLEIF, GS1, and D&B's websites, respectively.

### **Q: Does Global Business ID (GBI) contemplate mandatory identification of both the manufacturer and the seller (if not the same entity) rather than single ID upon import?**

Yes, GBI EPoC participants will be required to identify and submit a GBI (DUNS, GLN, and LEI) for the manufacturer/producer, seller, and shipper regardless of if they are or are not the same entity.

### **Q: Do you envision a database of GBI numbers being available in ACE? Or will the importer be required to gather and submit identifiers for each new entity?**

Importers will be required to obtain/gather a GBI for each new entity and submit it to CBP. There will not be a pre-loaded GBI database in ACE.

### **Q: Will the GBI address the issue with the Chinese and Vietnamese Manufacturers (where they show a city or province in their name to identify the location) causing multiple similar MIDS to be created which does not uniquely identify the party?**

One of the primary criteria for the GBI is the ability to uniquely identify global parties. The GBI EPoC will test whether the entity identifiers can address current MID challenges: lack of data quality, data richness, and uniqueness.

Below is how the entity identifier companies can address this issue:

When a GLEIF Local Operating Unit (LOU) - whether in Vietnam, China, or elsewhere - issues an LEI, they must validate the reference information such as legal name, legal and headquarter address, entity registration ID to ensure it is a unique entity. GLEIF also provides the LOUs a tool that checks for duplicates.

GLNs are obtained or created as the result of a licensing process that requires a company to register party information with GS1. If a GLN is created to identify a physical location that does not include the party information, it could be obtained by seeing which party licensed the right to create that particular identifier. Apart from licensing, the majority of GLNs actively used around the world have a single GLN identifying both a party and location.

**Q: Will the GBI replace the Manufacturer/Shipper Identification Code (MID)? Making the MID no longer required.**

The GBI EPoC will test the GBI as a potential replacement and/or supplement to the MID. However, the MID will still be required and accepted in parallel at import until a full evaluation of the GBI is conducted.

**Q: Is the expectation that the GBI EPoC will reveal one of the three identifiers (DUNS, GLN or LEI) to best serve as the GBI or are all three identifiers expected to become mandatory as part of this initiative?**

The GBI EPoC will test the abilities of the three entity identifiers (DUNS, GLN, and LEI) and determine the optimal combination that uniquely identifies: main legal entity and ownership; specific business and global locations; and supply chain roles and functions. The optimal combination could be one, two, or all three entity identifiers. The GBI EPoC is a test and is not guaranteed to become mandatory.

**Q: CBP shared that the GBI implementation guide was distributed back in April 2021. Was the implementation guide announced via the Cargo Systems Messaging Service (CSMS) and where can you find it?**

CBP published a draft ACE Cargo Release Implementation Guide that contains the changes needed for the GBI on April 21, 2021. You can find the guide in CSMS #47103405.

**Q: Will the GBI replace the DUNS number that FDA requires?**

The GBI initiative seeks to streamline import data collection and reduce the number of entity identification systems that the federal government uses. The GBI EPoC will help inform agencies such as the FDA whether the GBI can replace, supplement and/or complement their agency-specific entity identification systems.

**Q: Is there concern that DUNS can have duplicate numbers issued for the same entity?**

One of the primary criteria for the GBI is the global uniqueness of identifiers. The GBI EPoC will evaluate the utility and usefulness of all three entity identifiers including whether there are duplicate numbers. The GBI EPoC will inform which entity identifier(s) meets U.S. Government needs.

**Q: Would the importer participant in the GBI EPoC have to have all imports from all suppliers obtain a GBI or only select suppliers that meet the focus of the scope?**

GBI EPoC participants will only be required to obtain the entity identifiers (DUNS, GLN, and LEI) for imports that fall within the pilot scope. Countries of Origin/Export: Australia, Canada, China, France, Italy, Mexico, New Zealand, Singapore, United Kingdom, and Vietnam. Product Categories: Alcohol, Medical Devices, Personal Items, Seafood, Toys, and U.S. Goods Returned. A list of Harmonized Tariff Codes (HTS) codes has been identified for the product categories and will be provided in the GBI Federal Register Notice.

