Today's Presenters

ISF Enforcement

Where Are We Now?

Tuesday, May 5, 2015

Webinar Recording Available Here
http://www.cbp.gov/trade/stakeholder-engagement/webinars

Today's ISF Topics

- ISF Enforcement
- Bill of Lading Match
- Cargo Holds
- Liquidated Damages
- Mitigation
  - Petition Process
  - C-TPAT Benefits
  - Compliance Reports
  - Best Practices

ISF Timeline

SAFE Port ACT of 2006
100% Cargo Screening
at 700 Ports (unfeasible)
July 1, 2012 extended to
July 1, 2016

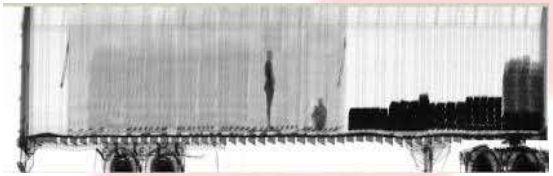
01/26/09
ISF Interim Rule
Still Operate Under
Interim Rule Today

07/09/10
CBP FAQ

05/13/14
CSMS #14-000283
ISF Enforcement
CBP FAQ 05/18/14

05/14/15
Full ISF Enforcement
NPRM (ISF-5)
ISF Final Rule

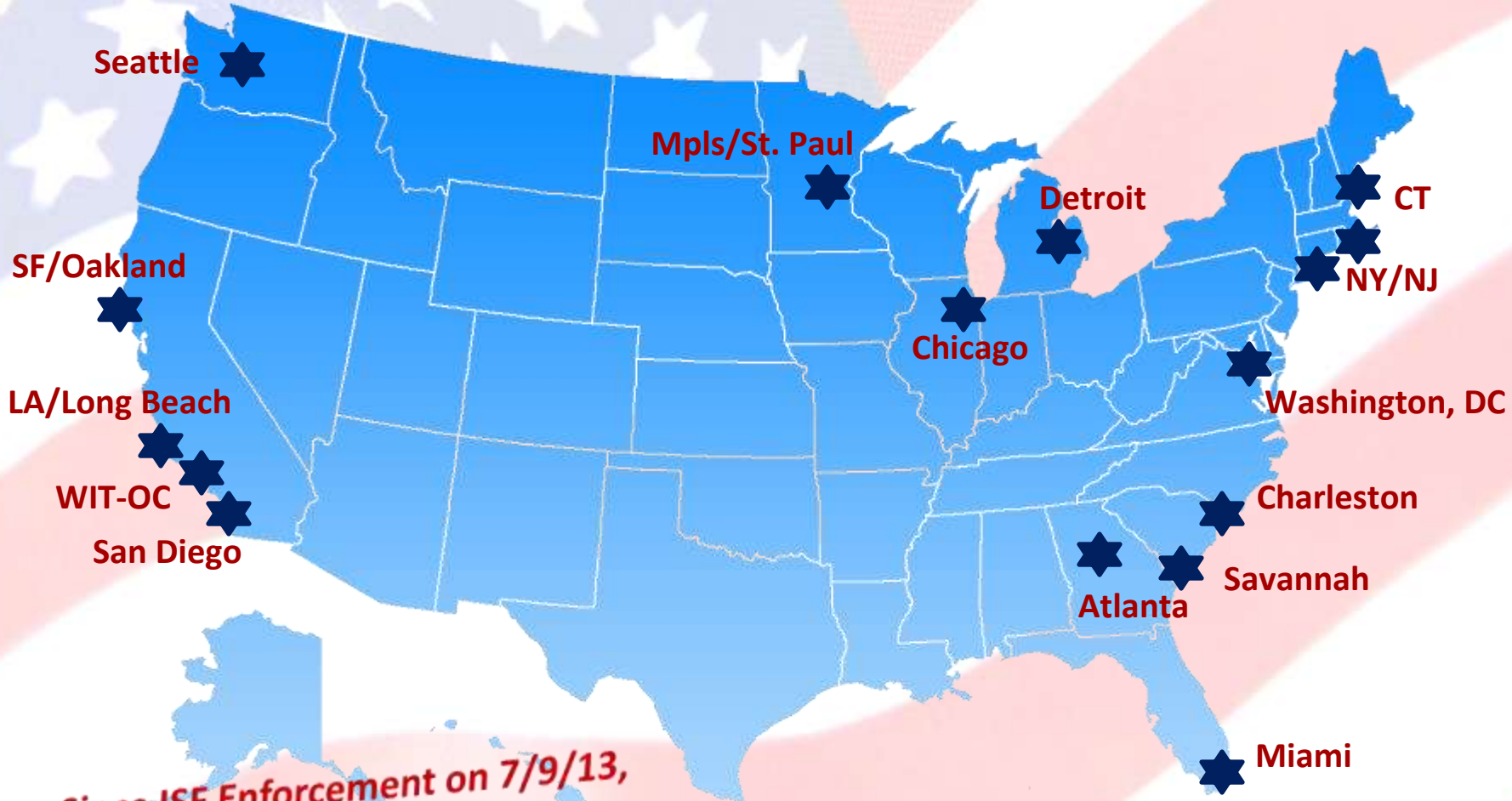
01/26/10
ISF Bonding
CBP 19CFR149(b)



01/02/08
ISF NPRM
10+2 Advance Data
Container Security Initiative (80%)
CBP's "Risk-Based Approach"

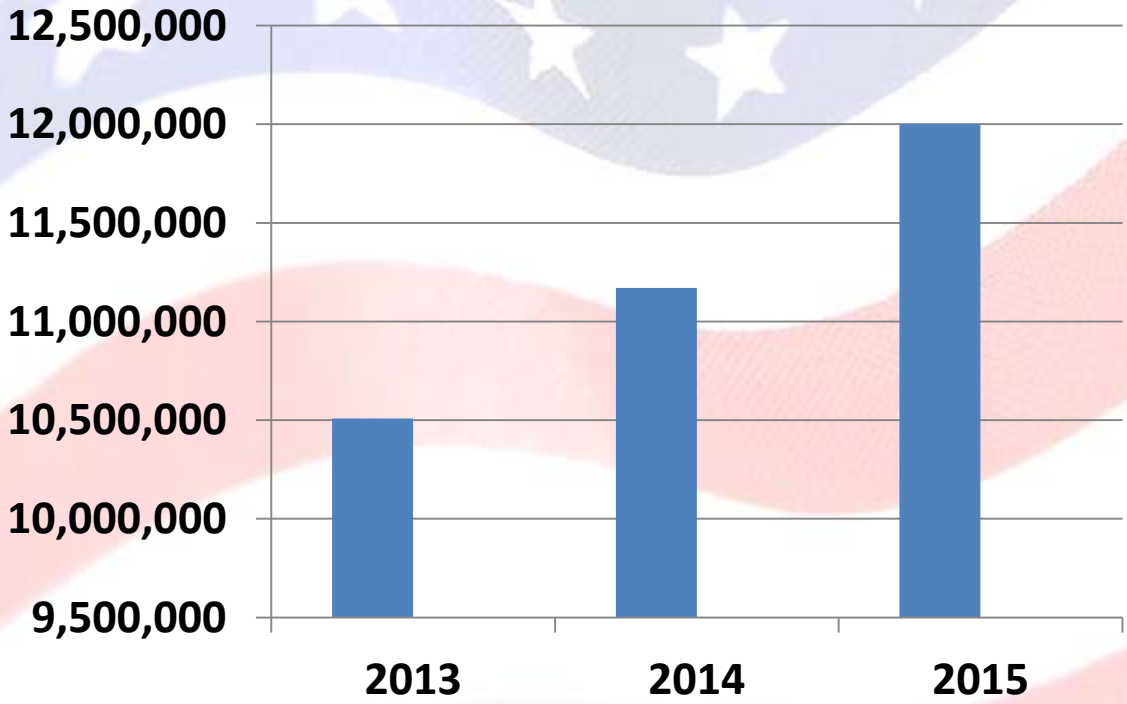
07/09/13
ISF Enforcement (Cargo Holds)
CSMS Enforcement Message

ISF Outreach



Since ISF Enforcement on 7/9/13, more than 20 outreach sessions have been conducted nationwide

ISF by the Numbers



The national compliance rate for ISF-10s is 92% = % of Importers Filing ISF

ISF-10 Importers

- *Over 289,000 filing ISF*
- *99% under Continuous*
- *Over 185,000 C1 Bonds*
- *Over 79,000 S16 Bonds*
- *ISFs exempt from bonding*

ISF-10 Filers

- *Over 2,500*
- *85-90% of ISFs filed by Customs Brokers*

Unified ISF in ACE

Federal Register Notice on 02/10/15

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A1901SSH      10011401
B  1901SSHSE
SE10ASSH  60001472 11EI 23-0032980001080052320210
SE15RSTAR091228010001                                    00000100
SE30SE BRAZIL RESOURCES INC
SE3515 1111 WEST HASTINGS STREET
SE36VANCOUVER                          BC       V6E 2J3        CA
SE30BY 3D PIONEER SYSTEMS INC
SE3515 951 PINE COVE
SE36ATLANTIC JUNCTION                  NY       10307          US
SE30ST START TIMES LTD
SE3515 1407 MAGNUS STREET
SE36AMYVILLE                           CA       90210          US
SE40001CN BRAND NAME WATCH MODEL ABC
SE50CN                                    EI 23-003298000
SE50MF CAPITAL TIMEPIECES LTD
SE5515 3 QIANMEN E ROAD
SE56BEIJING                            11                      CN
SE608401100000
SE608412294000
SE608467220040
SE609205902000
SF10101ACTEI 23-003298000          11
SF25CNSTAR0912201
SF25CNSTAR0912202
SF25CNSTAR0912203
SF25CNSTAR0912203
SF25CNSTAR0912204
SF25CNSTAR0912205
Y  0000SSHSE
Z0000SSH      10011401
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Customs Business

- *CBP will review more than 5 days out from arrival*
- *Audit Records match from ISF/Entry/Summary*

ACE Cargo Release Records

ISF Records

- *Must file at HTS 10-digit level*
- *File ISF/ACE Cargo Release 24 Hours prior to vessel departure*
- *NEI Webinar*

ISF Enforcement

ISF Enforcement

Effective 5/14/15

Cargo Holds

Same as today per local port policy

Based on ISF Timeliness/BL Match

Does not always mean an NII

Rarely means full inspection

Delays are costly

Liquidated Damages

Review by CBP-HQ ends

Warnings not required

Focus continues on significantly late and repeat violations

Claims issued within 6 months

ISF Enforcement

ISF-10 "U.S. Bound" Cargo

(3461 Entries, IT, FTZ)

24 Hrs Prior to Lading*

1. Importer of Record or FTZ Number
2. Consignee Number(s)
3. Seller (Owner) name/address
4. Buyer (Owner) name/address
5. Ship to Party name/address
6. Manufacturer (Supplier) name/address
7. Country of Origin
8. Commodity HTS-6 digit level

ASAP, But NLT 24 Hrs Prior to Arrival

9. Container Stuffing Location
10. Consolidator (Stuffer) name/address

***Must be linked together as a line-item at the ISF shipment level**

***ISFs for "exempt" break bulk shipments are required NLT 24 hrs prior to arrival**

ISF-5 "Transit" Cargo

(FROB*, IE, TE)

24 Hrs Prior to Lading*

1. Booking Party name/address
2. Ship to Party
3. Commodity HTS-6
4. Foreign Port of Unlading
5. Place of Delivery

***FROB ISF-5 is required anytime prior to lading**

Carrier Requirements

Vessel Stow Plan

NLT 48 Hrs After Departure*

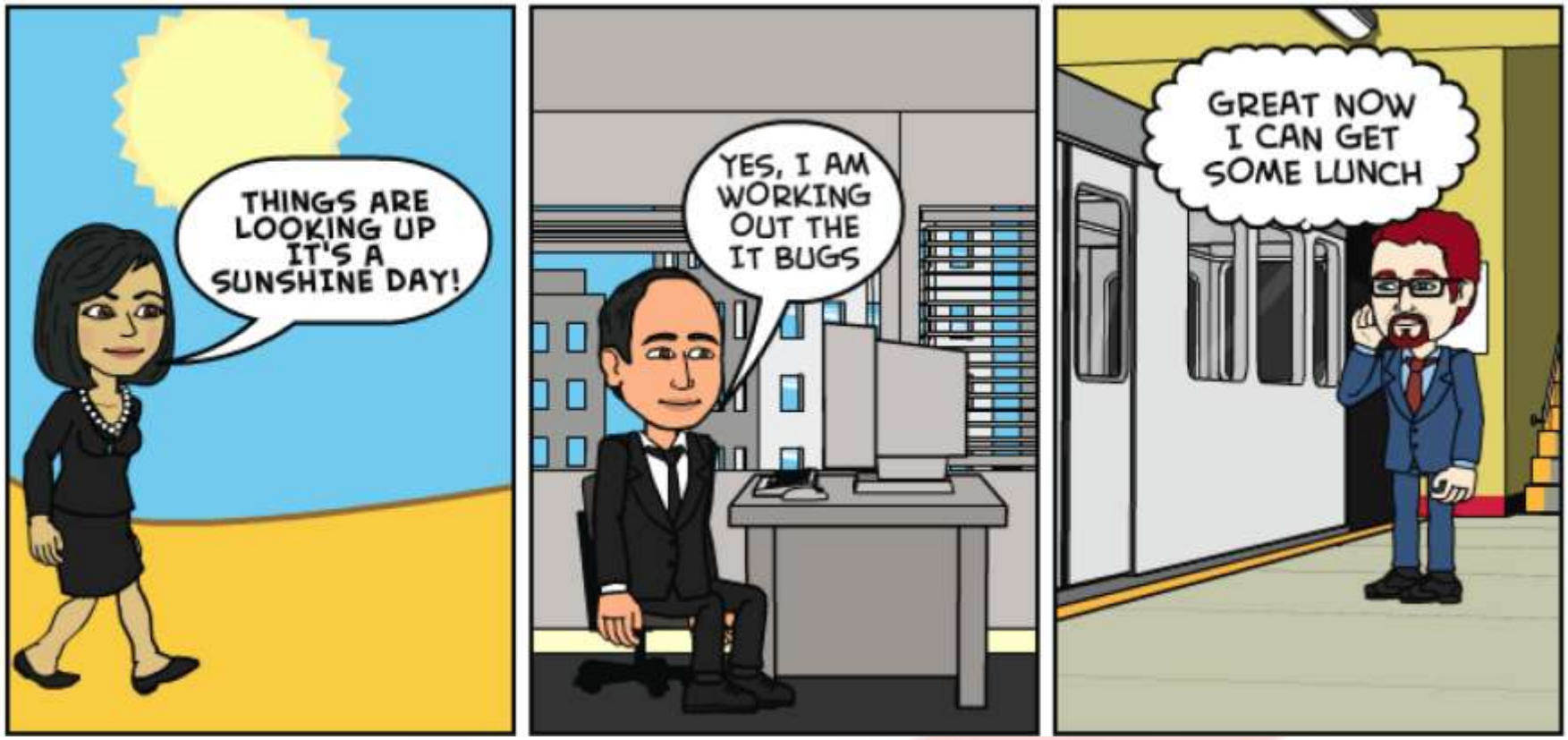
*Anytime prior to arrival for voyages less than 48 Hrs

For all vessels carrying containers

Container Status Message (CSM) Data

w/in 24 Hrs of Creation or Receipt

ISFs must contain the lowest bill of lading number (i.e., regular or house B/L) as referenced in the Automated Commercial Environment (ACE).


THINGS ARE LOOKING UP IT'S A SUNSHINE DAY!
YES, I AM WORKING OUT THE IT BUGS
GREAT NOW I CAN GET SOME LUNCH

Bill of Lading Match

- **B/L required as part of the ISF transmission (11th Data Element)**
  - B/L to lowest common denominator (House or Regular B/L)
  - The ISF must be matched to B/L as soon as possible
  - The match links ISF to Customs manifest data in ACE to be visible to CBP

- **CBP cannot target ISF or verify ISF timeliness without B/L match**
  - ***2 Distinct Processes to ISF and B/L Match***
  - ***ISF on File (3Z disposition code) – 24 Hours Prior to Vessel Departure Message***
  - ***B/L Match (S1 disposition code) – Match as soon as possible***
  - ***CBP can measure ISF timeliness by VDM***
  - Trade Act of 2002 requires VDM
    - 19 C.F.R. § 4.7d(b)(5) requires ocean carrier
    - 19 C.F.R. § 113.64(c) = $5,000 per violation

Bill of Lading Best Practices

- ACE will query for B/L match only for 60 day period.
- **Best Practice:** Query B/L match 5 days prior to arrival in the U.S. in case B/L number has changed; again at 48-72 hours intervals.
- In most cases, ISFs should not be deleted and retransmitted to secure a match.

3U	Security Filing Deleted	This code applies if there are no longer any ISFs on file for the bill of lading.
3Z	**Security Filing On File**	**This code applies if there is an ISF on file for the bill of lading.**
S1	**Bill on File**	**Generated when the ISF is matched to an AMS bill of lading.**
S2	No Bill Match (Not on File)	Generated when ISF bill is NOT on file in AMS immediately after filing the ISF.
S3	No Bill Match (Not on File)	Generated when the ISF bill is NOT on file in AMS 5 days after filing the ISF.
S4	No Bill Match (Not on File)	Generated when the ISF bill is NOT on file in AMS 20 days after filing the ISF.
S5	No Bill Match (Not on File)	Generated when the ISF bill is NOT on file in AMS 30 days after filing the ISF.
S6	No Bill Match (Wrong Type)	Generated when ISF bill is on file in AMS as a different bill type.
S7	Duplicate ISF	An ISF with same Number and IOR has been filed by another filer.
SA	No Bill Match (Wrong Type)	ISF bill is on file in AMS as different bill type, 5 days after filing the ISF.
FSB	No Bill Match (Wrong Type)	ISF bill is on file in AMS as different bill type, 20 days after filing the ISF
SC	No Bill Match (Wrong Type)	ISF bill is on file in AMS as a different bill type, 30 days after filing the ISF

Bill of Lading Match Updates

- **B/L Match Drops from ACE**
  - NCBFAA ISF Subcommittee sent examples to CBP
  - TT# 106724 first identified this problem
  - PR# 49228 corrects this bug in ACE with Increment 10
  - Increment 10 deployed between May-August 2015
  - If your B/L match drops you will need to file a new ISF

TO AVOID CARGO HOLDS, file ISF on TIME

ISF Cargo Holds

- Non-compliant ISFs subject to cargo holds in ACE
- Holds subject to local policy
- FCL vs. Consolidated Cargo
- No comparison of ISF to Entry
- 2Q Code for National Security

Code	Name/Disposition	Action
2O	ISF Hold for no ISF on file	Informs the carrier that this shipment has a manifest hold.
2P	ISF Hold - ISF Compliance Issue	Informs the carrier that this shipment has a manifest hold.
4O	ISF Hold Removed for no ISF on file	Generated to remove the ISF Hold identified in 2O
4P	ISF Hold Removed for ISF Compliance Issue	Generated to remove the ISF Hold identified in 2P

U.S. Port	2014 TEUs	2013 TEUs	Growth
Los Angeles, CA	4,272,493	3,968,200	8%
Long Beach, CA	3,537,860	3,456,436	2%
Newark/ New York	2,972,464	2,788,246	7%
Savannah, GA	1,355,928	1,157,338	17%
Norfolk, VA	981,518	902,258	9%
Tacoma, WA	821,880	724,163	13%
Oakland, CA	820,979	780,682	5%
Houston, TX	768,865	682,108	13%
Charleston, SC	748,511	658,049	14%
Seattle, WA	457,904	572,165	-20%
Miami, FL	Not Avail	363,699	.06%
Port Everglades, FL	Not Avail	336,456	10%
TOTAL	19,431,844	18,260,797	6%

ISF Cargo Holds

- **Each port implements based on local needs and resources**

Port	Date	Port Notice Link	Cargo Holds
Seattle/Tacoma	07/22/13	CBP Trade Information Notice 13-17 WA	5 Days/Arrival
LA/Long Beach	10/01/14	CSMS #14-000520; LA 13-026 Public Bulletin	4 Days/Arrival
San Francisco/Oakland	07/15/14	Notice 728-14-11; Notice 782-13-09	48 Hours/Arrival
NY/NJ	08/04/14	Pipeline 14-024-NWK; Pipeline 13-027-NWK	24 Hours/Departure
Baltimore	08/05/13	BWI Port Information Notice 2013-16	24 Hours/Departure

ISF timeliness is measured on 24 hours prior to vessel departure date based on the vessel departure message (VDM) from ocean carrier.

- **Some ports not placing holds until closer to arrival as noted.**
- **Port determines what is significantly late for cargo holds.**
- **Port will issue updated pipeline if change in practice.**

C-TPAT Importers

- **When importers are C-TPAT certified…**
  - Consolidate with other C-TPAT cargo as best practice.

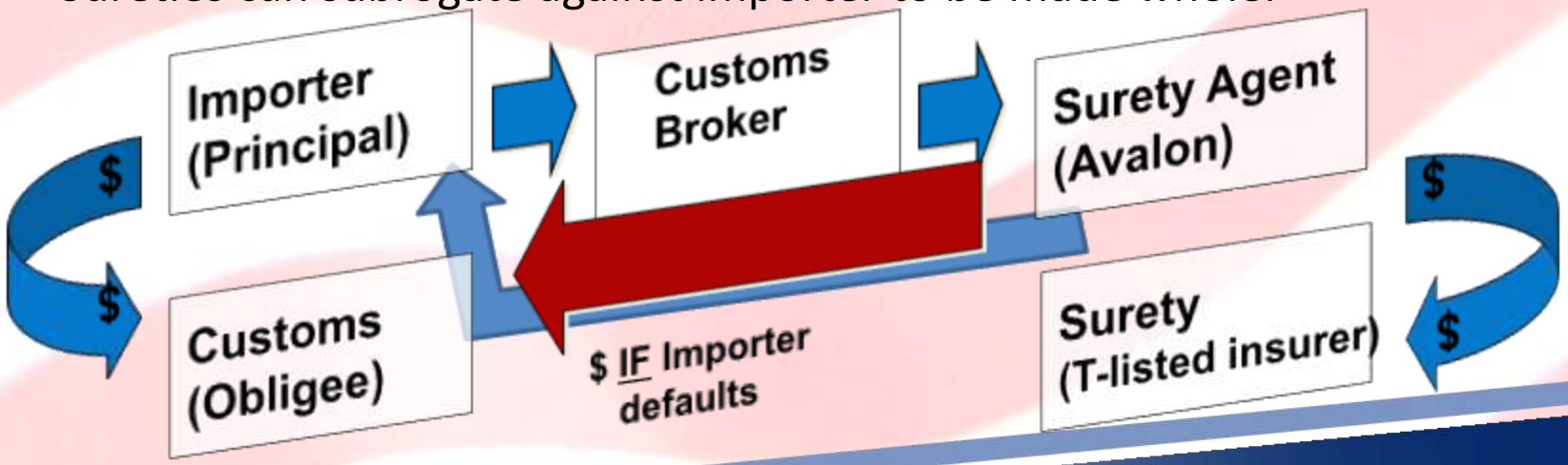
- **How can the Trade better identify C-TPAT importers?**
  - You must participate in C-TPAT to have access to the C-TPAT Status Verification Interface to search participants.
  - http://www.cbp.gov/sites/default/files/documents/Status%20Verification%20Interface%20%28SVI%29.pdf

- **A record of ISF non-compliance can threaten your C-TPAT status and/or participation.**

THE TRADE IS WORRIED ABOUT THE POTENTIAL FOR SO MANY LIQUIDATED DAMAGE CLAIMS!
NO NEED TO WORRY IF ISF IS FILED TIMELY
GUIDANCE IS COMING SOON

Customs Bond Contract

- **CBP requires ISF bonding per** CBP 19CFR149(b) & 19CFR113-G
  - Activity Code 1 Importer/Entry Bond (also Activity Code 2-4 and 16)
  - Liquidated Damages result from ***breach of the surety contract***
  - ***There can be no liquidated damage claim without a Customs Bond***
  - ISF $5,000 per any one violation; $10,000 maximum per transaction
- **Parties to a Customs Bond Contract**
  - Sureties obligate ISF importer's performance to comply.
  - Sureties can subrogate against importer to be made whole.



eBond for ISF-10 STBs

- **Effective 1/10/15:** ISF Submission Types 5-6 eliminated
- **CSMS# 14-000636 - Elimination of Late filed ISF transmissions**

ISF Submission Type	1N	5	M	1 = Importer Security Filing 10 (ISF-10) 2 = Importer Security Filing 5 (ISF-5) New Types 3 = ISF-5 submission type is being changed to an ISF-10 4 = ISF-10 submission type is being changed to an ISF-5 5 = Late ISF-10 without a bond 6 = Late ISF-5 without a bond	1

- **Revised Enforcement Policy Eases Burden**
  - Ports advised to issue ISF claims within 6 months of violation.
  - Does not absolve CBP of its rights to issue claims up to 6 years per statute (mostly in fraud cases); all litigation is subject to 28 USC § 2415(a).
  - ISF Bond Exemptions remain in force
  - Liquidated Damage focus continues to be on egregious and/or repeat offenders

ISF Bonding Exemptions

- **Per CBP's 2010 FAQ, bond requirements are waived for the following ISF coded transactions:**
  - Type 3 Household Goods/Personal Effects
  - Type 4 Government and Military
  - Type 5 Diplomatic
  - Type 6 Carnets
  - Type 9 International Mail
  - Type 11 Informal Shipments (under $2,500 value)

ISF Liquidated Damages

- **Types of Violations**
  - Late ISFs
    - *ISFs that are significantly late*
  - B/L Mismatch (Inaccurate ISF)
    - *Inaccurate bill of lading match at time of arrival.*
  - Incomplete or Inaccurate ISFs
    - *No Compliant Transaction (CT) on Flexible Filing 24 hours prior to arrival*
    - *ISF data reviewed separately from Entry (unless unified)*

ISF Liquidated Damages

- Issued by Port on standard 5955A
- **Untimely ISF,** the ISF was filed 5 days late

07/17/13 SECTION 203 OF THE SECURITY AND ACCOUNTABILITY FOR EVERY PORT ACT OF 2006 AND SECTION 343(A) OF THE TRADE ACT OF 2002 REQUIRES IMPORTERS TO FILE THE ISF 24 HOURS PRIOR TO LOADING IN A FOREIGN PORT. CARGO WAS LOADED AND VESSEL SAILED FROM ANTWERP, BELGIUM ON 07/12/13.
THIS IS A VIOLATION OF 19 CFR 149.2. THE PENALTY AMOUNT IS $5000. MITIGATION GUIDELINES IN CBP DECISION 09-26 (JULY 17, 2009) APPLY TO THIS CASE.
LATE IMPORTER SECURITY FILING SUBMITTED.

- The claim was petitioned and mitigated from $5,000 to $1,000 for first-time violation.

ISF Liquidated Damages

- **Bill of Lading Match – Inaccurate ISF**
  - At the time of filing the ISF Transaction, the ISF importer did not have a correct B/L number.
  - The Ocean Carrier could only provide a booking number at time of cargo loading onto the vessel.
  - The actual B/L number was not received or updated prior to the cargo's arrival in the U.S.

HAD INACCURATE BILL OF LADING MATCH AT TIME OF DISCHARGE 06/07/2014 TO PORT OF NORFOLK.
ISF IMPORTER SUBMITS AN INACCURATE IMPORTER SECURITY FILING

  - Procedures put in place to avoid future errors, claim successfully mitigated to $1,000

Full ISF Enforcement

- **Liquidated Damages**
  - *Impact of multiple ISF violations?*

100/Year	%	#	Worst	Best	C-TPAT	C1 Bond
Violation	3%	1-3	$ 15,000	$ 6,000	$ 3,000	N/A
Violation	5%	5	$ 25,000	$11,000	$ 5,500	N/A
Violation	10%	10	$ 50,000	$23,500	$11,750	$50,000
Violation	20%	20	$100,000	$48,500	$24,250	$50,000

Remember CTB bond limits LD exposure to Bond Amount per annual bond period; 93% of all CTBs are $50,000.

- *Worst assumes $5,000 liquidated damage per violation, no mitigation*
- *Best assumes $1,000 for 1st time violation, $2,500 all subsequent violations*
- ***C-TPAT (Tier II and Tier III only) assumes 50% reduction of Best***

PEYMAN, I THINK WE ARE DONE
NOT YET WE NEED TO REVIEW MITIGATION!

ISF Mitigation

Violation Type	Cause	Max.	1st Violation	All Other	C-TPAT (II/III)
ISF-10 Filing	Late File	$5,000	$1,000-$2,000	$2,500	50%
ISF-10 Filing	Inaccurate Filing	$5,000	$1,000-$2,000	$2,500	50%
ISF-10 Filing	Inaccurate Update(s)	$5,000	$1,000-$2,000	$2,500	50%
ISF-10 Filing	Failure to Withdraw	$5,000	$1,000-$2,000	$2,500	50%

Mitigating Factors

- ISF-5 for FROB cargo is not subject to liquidated damages at this time, but would be subject to same violation types and mitigating factors.
- **6 Mitigating Factors:** 1) ISF progress since 1/26/09; 2) Small # of violations to shipments (as %); 3) C-TPAT Tier 2 or 3 status; 4) Demonstrated action to reduce future violations; 5/6) ISF filed late or inaccurate, can mitigate if due to factors outside importer's control (such as carrier error).
- **4 Aggravating Factors:** 1) Non-cooperative; 2) Multiple errors on the ISF; 3) Rising/Deteriorating Error Rate; 4) Smuggling/Fraud.

Mitigation Best Practices

- **Describe Nature of Error or Violation**
  - If clerical in nature, describe why it occurred.
  - Is ISF Filer or Carrier at fault? Provide specific details.
  - Was it a one-time or repeat violation? Explain.
  - Outline how future violations will be avoided.
- **Importer's ISF Performance Record**
  - How long has importer been compliant with ISF?
  - Emphasize importer's compliance record
    - Timeliness/Accuracy (95% timely/98% accurate)
    - Include ISF Progress Report (from Filer or ACE portal)
    - Overall cooperation
- **C-TPAT Status**
  - Request 50% mitigation based on C-TPAT status of importer and/or ISF Filer.

Mitigation Best Practices

- **Maintain Records for Mitigating Factors in Petitions**
  - CSMS# 15-000051 - Delays in ISF Processing on 1/26/15
- **Other Mitigating Factors**
  - Carrier changes the B/L number, causing a mismatch
  - ISF was filed timely but B/L mismatch made it appear late (typically only if B/L number provided prior to cargo arrival)
  - LD claims not issued within six (6) months of the violation. Reference CBP Policy and request full cancellation, however CBP has a six (6) year statute of limitations to issue LD claims
  - Small Business Regulatory Enforcement Fairness Act to flat cancel claim in full due to financial hardship, otherwise mitigate to the lowest extent possible

ACE Manifest Query

- **CSMS# 15-000226 - ACE Cargo/Manifest/Entry Release Query (CQ) NOW available in CERTIFICATION**

ACE ABI CATAIR - Customs and Trade Automated Interface Requirements

Record Identifier WN1 (Output)					
Data Element	**Length/ Class**	**Position**	**Desig.**	**Description**	**Note**
Actual In-bond Destination via edi in-bond diversion	4AN	40-43	C	Actual In-bond Destination if subject to a In-bond Diversion request sent via edi. (possibly for future use, verify).	
Vessel Departure Port	5AN	44-48	C	Vessel departure port as reported by the Ocean carrier. Census Schedule K Foreign Port code will be returned.	
Vessel Departure Date	6N	49-54	C	Vessel departure date, in MMDDYY (month, day, year) format, as reported by the Ocean carrier.	
Container Load Port	17AN	55-71	C	Port where the container was loaded onto the importing vessel as reported in the Container Status message by the Carrier. Will be returned if on file when the query is received.	1
Container Load Date	6N(?)	72-77	C	Date container was loaded onto the importing vessel as reported in the Container Status message by the ocean carrier. Will be returned if on file when the query is received.	1

ACE ISF Portal

- **All ACE accounts access ISF reports in same manner**
  - Go to References Tab
  - Select Task "Links" from Menu Panel on the left
  - Button to "Launch ISF" will appear
- **"Launch ISF" will open new window**
  - Sign up for reports in Reports Menu
  - Reports will then appear in Reports Tab (check daily)

CSMS #11-000155 effective 7/13/11
http://apps.cbp.gov/csms/viewmssg.asp?Recid=18395&page=9&srch_argv=11-000155&srchtype=&btype=abi&sortby=&sby=
http://apps.cbp.gov/csms/docs/18395_749938721/Final_Information_Notice_ISF_Portal.pdf

ISF Progress Reports

- **Per CBP, only an estimate of ISF compliance**
- **C-TPAT tier 2 and 3 receive line item detail**

Last 3 Month History

Transaction Date Range: 7/1/11 - 9/30/11

U.S. Customs and Border Protection
Importer Security Filing (ISF-10) Progress Report

Report Date: Oct 4, 2011 10:14:11 PM

Filer Code: **Filer Name:**
ISF Importer Nbr: **ISF Importer Name:**

1. ISF-10 Submission Volume:

Submission Status	Message Format	Message Action	Year-Month 2011-07	2011-08	2011-09	Total
Accepted	ABI - CATAIR 8F (Stand-alone)	Add	141	249	100	489
Accepted	ABI - CATAIR 8F (Stand-alone)	Delete	2		2	4
Accepted	ABI - CATAIR 8F (Stand-alone)	Replace	22	20	10	52
Rejected	ABI - CATAIR 8F (Stand-alone)	Add			1	1
		Total	165	269	113	546

2. Rejection Error Frequency:

Message Format	Err Nbr	Error Message	Year-Month 2011-09	Total
ABI - CATAIR 8F (Stand-alone)	117	DUPLICATE ISF TRANSACTION	1	1
		Total	1	1

3. Timeliness Performance:

ISFs are measured as timely if accepted 24 hours prior to vessel departure. An accepted ISF that is later replaced retains the original file date for timeliness purposes.

ISFs Measured for Timeliness	Year-Month 2011-07	2011-08	2011-09	Total	Pct
ISFs Filed before 24 hrs prior to Vsl Departure Date	102	207	39	348	99.4%
ISFs Filed after 24 hrs prior to Vsl Departure Date		1	1	2	0.6%
Total	102	208	40	350	

ISFs Not Measured for Timeliness	Year-Month 2011-07	2011-08	2011-09	Total
ISFs not matched to bills	4	5	5	14
ISFs with no Vessel Departure Message or not yet measurable	36	35	53	124
Total	40	40	58	138

Reports provide only a 3-month snapshot in time

ISF Progress Reports

- *ISF Timeliness:* Vessel Departure Date per VDM – 24 hours
- Based on departure of mother vessel destined for the U.S.
- *ISFs Not Measured for Timeliness:* No VDM received by CBP.
- Per CBP, these are not late ISFs and do not negatively affect an importer's compliance rate.

ISFs Not Measured for Timeliness	2013-06	2013-08	Total
ISFs with no Vessel Departure Message or not yet measurable	1	3	4
Total	1	3	4

Late ISF Reports

- **CSMS #12-000031** dated 2/1/12
- **Late ISF Report for ISF Filers and Importers**

U.S. Customs and Border Protection

Importer Security Filing (ISF-10)

Last 3 Month History

ISFs Filed after 24 hours prior to Vessel Departure Date

Transaction Date Range: 5/1/13 - 7/29/13 Report Date:

ISFs are measured as not timely if accepted after 24 hours prior to vessel departure. An accepted ISF that is later replaced retains the orginal file date for timeliness purposes.

Filer Code	ISF Importer Name	ISF Importer Nbr	ISF Transaction Number	SCAC	Bill Number	ISF Submission Date/Time (First File Date)	Vessel Departure Date

- **Run by ISF Filer or Importer (ACE Portal)**
  - Available in PDF or Excel
  - Allows for line item detail and compliance
- **CSMS# 15-000126 - Importer Security Filing Reports**

This message is to notify the trade as to the timeframe Importer Security Filing Reports are stored in ACE. Effective 03/06/15 Importer Security Filing reports on the ISF Portal in ACE will only be kept for 120 days. Reports older than 120 days will not be shown on the portal and will not be accessible.

ISF BEST PRACTICES

ISF Best Practices

5) Importer Responsible for ISF Enforcement

- Timely, Complete, and Accurate ISF
- Exposure to ISF Enforcement: Cargo Holds and Liquidated Damages (capped by continuous or single bond amount)
- C-TPAT importers receive benefit from best loading practices and 50% reduction on mitigation for Liquidated Damages claims
- Importer also subject to penalties for fraud up to the value of the cargo in accordance with 19 U.S.C. 1595a(b)
- ISF Filer can assist with importer compliance in many ways

ISF Best Practices

4) ISF Timeliness and Accuracy

- 24 hours prior to the Vessel Departure Message (VDM) from the Ocean Carrier of the Mother Vessel destined for the U.S.
- ISF Match is the 3Z message code, the S1 B/L match will come later.
- The Bill of Lading Match must occur for the ISF to be accurate, and should match before CBP conducts its targeting, but absolutely before the cargo arrives at the first ocean port of entry in the U.S.

3) File ISF Even if Late

- It is better to file an ISF than to never file at all, CBP wants the data.
- Entry cannot be made without an ISF, better to file than abandon cargo.
- Remember bonding exemptions, there is no LD claim without a bond.
- CBP is often satisfied with the examination, but must file the ISF.

ISF Best Practices

2) Flexible Filings are not so Flexible

- Flexible Filings (FR, FT, FX) must be updated 24 hours prior to cargo arrival as a Compliant Transaction (CT).
- Failure to do so can result in Liquidated Damage claims.
- CBP recommends filing as a Compliant Transaction (CT) since updates can always be made up until cargo arrives in the U.S.

1) Always Update a Timely ISF; Don't Delete and Redo an Untimely ISF

- Updates to ISFs are allowed during transit and encouraged to reflect the most current information available (i.e., change in ISF importer, consignee, B/L number, etc.). ISF Importer may not match IOR on Entry.
- ISFs can be updated per **19 CFR 149.2(d)**

ISF Contacts & Links

Avalon

ISF Questions	**Group email:** Bond-underwriting@avalonrisk.com, **Hot Line:** 847-700-8473
ISF Web Page	http://www.avalonrisk.com/isf.html
NEI ISF & ACE Webinar	https://www.youtube.com/watch?v=H0O8_zA62FE

CBP

Peyman Jamshidi	Peyman.jamshidi@cbp.dhs.gov; security_filing_general@cbp.dhs.gov or 202-325-1894
CBP ISF Page	http://www.cbp.gov/border-security/ports-entry/cargo-security/importer-security-filing-102
CBP ISF FAQs	http://www.cbp.gov/sites/default/files/documents/10_2faq_0.pdf http://www.cbp.gov/sites/default/files/documents/Addendum to FAQ_Updated ISF Enforcement Strategy.pdf
ISF Mitigation Guidelines	http://www.avalonrisk.com/questnewsletter/news/mitigation.pdf
CBP's ISF Video	http://www.cbp.gov/newsroom/video-gallery/2014/02/identifying-risks-early
Unified ISF/Cargo Release	http://www.cbp.gov/trade/ace/catair http://www.cbp.gov/document/guidance/cargo-release-ace-catair-chapter http://www.cbp.gov/document/guidance/cargo-release-error-codes http://www.cbp.gov/document/guidance/cargo-release-status-notification-ace-catair-chapter http://www.cbp.gov/document/guidance/ace-abi-catair-batch-block-control-chapter

Contact Information

M. Craig Clark, ACAS Program Manager – CBP Headquarters
Office of Cargo and Conveyance Security, Office of Field Operations (OFO)

- Mr. Clark can be reached directly at 202-344-3052 or craig.clark@cbp.dhs.gov
- Refer to CBP ACAS Strategic Plan for most current information

Peyman Jamshidi, ISF Program Manager – CBP Headquarters
Office of Cargo and Conveyance Security, Office of Field Operations (OFO)

- Mr. Jamshidi can be reached at 202-325-1894 or peyman.jamshidi@cbp.dhs.gov
- Refer to CBP ISF webpage for most current information

Lisa Gelsomino, President/CEO – Avalon Risk Management
14th Term COAC, NCBFAA ISF Subcommittee, TSN eBond Subcommittee, ITSA/CSEC

- Founding partner of Avalon, licensed insurance broker, extensive ISF outreach
- Email: lgelsomino@avalonrisk.com or Phone 847-700-8192

Questions?

Thank you for participating!

1.5 CCS Credits Available

Email your registration receipt to nei@ncbfaa.org