
Great Idea Form

Requirement Summary

GIF:	CSPO-GIF-1087	Status:	Pending CBP Change Control Board (CCB) Review	Submit Date:	October 23, 2009
Title:	ENT 008-A2.3-Data Elements Expansion				

Origination

Requirement Initiator:	Art Litman
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Sponsor:	Monica Crockett

Source:

Source:
Trade Request

Business Sponsor

Business Office:	Office of Information and Technology
Executive Director for the Business Office:	Lou Samenfink

CSPO Planning

Change to CSPO System?	
Change Planned?	Where/When Planned?
Assign to System:	Assign to Release/Delivery: A2.3

Requirements Description

Business Area:	
Request Type:	Business Need
Impacts Trade?	Yes
Description of Change:	<p>At time of import into the US, importers must rely upon the accuracy of commercial data from the shipper for information required for entry. However, until merchandise is received by the importer, merchandise data validated and the price determined and paid, the shipper's information is subject to revision in the normal course of business. Currently, for purposes of Reconciliation, Customs has limited the categories of issues that may be reconciled to those that it considers unrelated to the admissibility of imported merchandise. The trade community and Customs have been engaged in an active discussion about what is truly related to admissibility and thus excludable from Reconciliation. As it is the Trade's contention that additional elements should be reconcilable and it is possible for Customs policy to change, the ACE system design should contemplate the expansion of the data elements that can be revised. From a systems point of view, all data elements should be subject to revision through the filing of a post-entry amendment or reconciliation transmitted to ACE. As to the issues which Customs allows to be flagged as reconcilable ("elements of an entry"), Customs has required broad flags such as "value" instead of narrow flags such as "value – assist" in order to identify issues to be kept open for reconciliation. The advantage of a broad flag is that it provides an opportunity to reconcile issue aspects that may have been unanticipated at time of flagging but which are discovered prior to the filing of a Reconciliation. (By allowing retroactive flagging (ENT-010) importers' hands will not be tied by overly limiting flags.) The virtue of narrow flags is that it reduces contingent liabilities. Customs has stated that if all entries from a given year have been flagged for value, then until the subsequent Reconciliation liquidates, all entries are open for all value</p>

	<p>issues. If a narrow flag is used, then only those specific elements will remain open. For example, if an IASS line is flagged for dutiable commissions, then only the merchandise in that line would be open and only for dutiable commissions.</p> <p>Design capability for flexible use of either broad issue or specific issue flags. Allow for enough flag designations to cover the multiplicity of issues that may be subject to reconciliation.</p> <p>Expand the issues for which a reconciliation can be filed to include quantity on non-quota lines and American Goods Returned if claimed at the time of summary filing and in limited cases, with CBP prior approval, classification. Provide the flexibility for additional reconciliation categories as might be needed in the future to reconcile trade agreements.</p> <p>ACE should provide the ability for the trade to file quantity reconciliations, except on quota lines where a quantity change could indicate an admissibility issue. The 10 month time period allowed for post-summary (pre-liquidation) corrections is expected to reduce the number of quantity reconciliations filed.</p> <p>ACE should provide for the expansion of the use of HTS reconciliations to include American Goods Returned (AGR) when AGR has been claimed at the time of summary filing. ACE should further provide the ability for the trade, with prior approval from CBP, to reconcile an HTS classification issue involving the statistical suffix if discovered on an entry/reconfigured entry previously flagged for reconciliation. Changes to classification would only be approved if admissibility was NOT affected.</p> <p>ACE should provide the flexibility for additional reconciliation categories as might be needed in the future to reconcile trade agreements. It should be noted however, that not all Subcommittee members are in favor of the expansion of issues to be handled by reconciliation. They feel reconciliation should address value issues only and all other issues should be handled in other ways such as ENT-041 and 1520 (d) claims.</p>
Benefit of Change:	<p>Importers will have an incentive and means to insure that the government is ultimately provided with accurate data. Expands the issues for which a reconciliation can be filed. Provides needed flexibility for the trade.</p>
Impact Assessment:	

System/Subsystem

System:		Cargo Business Area:	
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Implementation Requirements

Needed By Date:	A2.3	Change Urgency:	
Level of Effort:		Cost Estimate:	

Sponsor Recommendation

Sponsor Recommendation:	
Sponsor Comments:	

Board Disposition

Date:	Disposition:	Comments:

Next Steps:

Next Steps:

Reasons for

Return/Deferral/Withdrawn/Rejection/Forward to PO

Reason for Return:	
Reason for Deferral:	
Reason for Withdrawal:	
Reason for Rejection:	

Reason for Forward to PO:	
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Secretary Comments:

Comments:

Related Items:

CR#:	CR Name:
PTR#:	PTR Name:

Attachments

Attachments:	
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Action Descriptions

Document History

Action History

Date:	User Name:	Note:

Update History

Date:	User Name:	Note:

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