
Great Idea Form

Requirement Summary

GIF: CSPO-GIF-1090	Status: Pending CBP Change Control Board (CCB) Review	Submit Date: October 23, 2009
Title: ENT-066-A2.4-ABI Reports to Replace Daily Statement		

Origination

Requirement Initiator:	Art Litman
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Initiator Phone:	
Sponsor:	Jim Byram

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: A2.4

Requirements Description

Business Area:	
Request Type:	Business Need
Impacts Trade?	Yes
Description of Change:	<p>When ACE is fully integrated with the new financial system [need name] the result will be a full separation of the trade's operational and financial interface with CBP. When this occurs, the operational/financial flow of information to the filer that currently exists under ACS will change. As a result, filers utilizing the Periodic Monthly Statement (PMS), will no longer receive the Daily PMS Statements (PDS) that incorporates both the financial information and operational information currently used by the trade to manage its workflow.</p> <p>This change creates the need for something in ACE to replace the statement. It also raises a number of operational questions. Today, customs brokers and self filers utilize the Daily PMS Statement (PDS) to manage their workload to create the checks and balances necessary to manage (validate) the PMS statement process on a daily basis. Under ACE PMS, the PDS represents all releases for a particular date that will be due for payment, in aggregate, the following month. In addition, the PDS is used as a daily transmission sheet for "documents due;" that is, trade uses it to monitor the 10-day clock to file documents required for specific entries identified on the PDS. It also is used to track the acceptance and finalization of duty free and fee free entries where no payment is</p>

due.

From an operational standpoint, after full ACE financial integration, brokers and self filing importers that will handle any volume of transactions will still need daily information to manage their operations. Waiting until the end of the month to receive the first ACE PMS statement is not an option. The inability to manage this large volume of data could subject the filer to late payment penalties. More frequent access to this information allows the importer/filer to incorporate “due diligence” into the process.

The trade would like the ability to have three reports that would replace the PDS and provide, essentially, the same information. The reports covered by this GIF are specifically aimed at the filers and exchanges only through ABI EDI interfaces in ACE as this is the way all entry filers work with CBP and the one that will have the immediate critical need for this once the revenue processing is broken away from the commercial operations in ACE. It is expected that some similar requests may come using the portal, but this request is not intended to cover the more limited needs of the group using the Portal.

The first report (Report A) would be provided to the filer (push by CBP via ABI) on a daily basis. It would be similar to the current PDS and would be managed the same way. Unless a different day was selected through the portal, the report would be provided eight working days after the date of entry and would list all entries (free and dutiable) for that release date. If documents were due for those entry summaries, the report would indicate what is due. The ability for a CBP import specialist to request entry copies in ACE through the validation process would continue, causing a UC message to be sent to the filer and the entry information to appear on the report.

The second report (Report B) would be a selectable ABI report that would allow the filer to pull a report, with the same data as Report A. Report B would allow the filer to select a single date of release or a range of release dates.

The last report (Report C) would also be a pull report via ABI. This report would provide information about open “docs required” requests. In simplest form, this report would list the entry number, date of release, documents requested by CBP and the due date. The request could be made for all open “docs required” requests, or based on due date. For example, a filer could request all open “docs required” requests from CBP that are expiring within 5 days. This report would serve as a check and balance for the filer to monitor ACE automated document requests.

While these are general outlines of reports that will be needed, it is necessary for CBP to have a sufficient number of work sessions with

the trade to fully vet the needs and methods to satisfy them with CBP and the programmers to finalize agreement on data details, timing, role of the Portal in the filer selecting time periods and other options.

There are still a number of issues that need further dialogue include:

- Proof of payment requirement for due diligence under 19 CFR 111.29 to satisfy CBP's auditors. It has been suggested that there may need to be a further message from CBP indicating that an ABI entry has been satisfied. Report A could satisfy the requirement .
- Question as to whether reports A&B can be combined into one regular request from the broker/importer-filer as a daily pull request from the filer. Questions arise as to whether CBP wants all these messages.
- The whole "docs required" changes need to be reviewed in the context of this change and the proposed changes by CBP. There were a number of discussions as to ways for the filer to batch paper document submissions on a daily basis and CBP to issue one receipt for all -- as opposed to CBP and the trade having to process each one separately.
- Different size filers may need to process their workload differently depending on their size. A filer that submits large volumes will need daily management, but smaller filers may want to manage on a weekly basis. We need input from both types of filers.
- Centralization also plays a factor in the "docs required" submissions. As CBP moves more to centralization and digitizing on receipt, the submission process will need to accommodate this for the greatest efficiency of both trade and CBP. Ultimately the trade would like the functionality to transmit and image to a centralized CBP computer as opposed to an individuals workstation
- We have never finalized our discussions on what constitutes receipt and satisfaction of the obligations created on the importer as a result of the release process. Documents are due in 10-days. What shows the importer that this has been satisfied? What about extensions – how is this process visible and what are the extension periods? The results of our discussions in this area will dictate some of the forms

	<p>that these reports described here may take. Report A could serve in this capacity</p> <ul style="list-style-type: none"> • Today under the Pilot, ACE warnings are sent to the filer per a UC message per entry summary. Report C should be "no response received by CBP within XX days of request . " • Even with financial being separated from operations, what financial details should be provided on these reports . Reports should break out fees from duties and taxes. The customs brokers have asked for detailed financial information (see the NCBFAA letter of June 1, 2007).
Benefit of Change:	
Impact Assessment:	

System/Subsystem

System:		Cargo Business Area:	
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Implementation Requirements

Needed By Date:	A2.4	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:	

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:
