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# Great Idea Form

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## Requirement Summary

<b>GIF:</b>	<b>CSPO-GIF-1091</b>	<b>Status:</b>	Pending CBP Change Control Board (CCB) Review	<b>Submit Date:</b>	October 23, 2009
<b>Title:</b>	ENT-067-A2.4-UC AND ACE ID Generation				

## Origination

<b>Requirement Initiator:</b>	Don Woods
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<b>Initiator Phone:</b>	
<b>Sponsor:</b>	Monica Crockett

## Source:

<b>Source:</b>
Trade Request

## Business Sponsor

<b>Business Office:</b>	
<b>Executive Director for the Business Office:</b>	

## CSPO Planning

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

## Requirements Description

Business Area:	Entry
Request Type:	Business Need
Impacts Trade?	Yes
Description of Change:	<p><b><u>Due to the absence of participation by CBP, it has been difficult to finalize this requirement, and as such come to agreement within the committee itself. We are submitting this as a placeholder requirement pending further detailed discussion by CBP with the trade.</u></b></p> <p>CBP and the trade are considering a proposal to replace the data elements “ultimate consignee” and the “manufacturer identification code (MID)” with four data elements to enhance targeting. In addition, CBP and the trade need to better align all trade entities in the manifest, entry/entry summary, and the Importer Security Filing (ISF). The trade entities should be clearly defined and consistent across the entire supply chain and all CBP applications. The new data elements replacing the ultimate consignee and MID would identify the ‘sold to’ and ‘deliver to’ parties and the “manufacturer/producer/grower” and “exporter/shipper/seller” parties, respectively. The proposed field for Manufacturer/ Producer/Grower as a future field to replace the MID is a placeholder for entries on which that information may be required. It will not be mandatory on every entry / line item, but is foreseen as a conditional field based on the commodity</p>

and/or circumstances of import. These conditions may be defined at a later point. The actual manufacturer is not currently required by the regulations other than for specific commodities (textiles, bearings, food products, etc.), and should therefore not be included as a mandatory field in ACE.

The definition for this field needs to also be in line with the definitions for the Importer Security Filing. CBP recognized the difficulties Trade has in obtaining this information, and has recognized that this information is frequently not available at time of entry for certain transactions.

The trade entities should be optional fields (placeholders) for entries on which this information may be required. These fields would not be mandatory for every entry or line item, but are foreseen as conditional fields based on the commodity and/or circumstances of import. These conditions may be defined at a later point.

To identify these parties, an ACE ID would be used as an alternative to the employer identification number (EIN), social security number, and the manufacturer identification code (MID) on the entry (cargo release) and the equivalent CBP Form 3461.

In the current environment, use of the EIN, social security number, and the MID code to identify the trade entities is very problematic. Importers are very concerned about using their tax number on customs transactions, especially individuals with the growing concern about theft identify. Additionally, the MID code presents a host of problems and challenges itself. The ACE ID will be used instead of the EIN, the social security number, and MID to identify the trade entities. Currently, there isn't a mechanism to generate the ACE ID for this purpose. This GIF sets forth the requirements for generating the ACE ID to replace the current identifiers.

To generate an ACE ID to identify trade entities, the following information is needed:

- Full legal name
- Complete address
- One numeric identifier such as an EIN, social security number, DUNS number, driver's license number, passport number, date of birth (individuals), telephone number, GPS

coordinates, and other commercially verifiable information. This third piece of data is needed for independent verification of the trade entity. The trade entity should have the ability to enter multiple pieces of data rather than just a single piece of data.

A separate ACE ID should be created whenever the address and the third piece of identifying information are different from the name. This will allow the same entity with different operating divisions a way to create unique ACE IDs.

The role of the entity assigned an ACE ID should not be limited. One ID would be assigned for all roles exercised by that entity if for example the entity is the “sold to” and “deliver to” parties.

Each data element (or entity) should have an accompanying “identifier” or “qualifier” to establish their role. For example, when there is more than one possible entity such as the “manufacturer/producer/grower,” this will help identify which entity that data element represents.

The trade needs the ability to file a “disclaimer” in the event a data element can’t be accurately reported. An example would be when the exact manufacturer or deliver to party can’t be identified. There needs to be some business rules when a disclaimer can’t be used. However, there are some situations when by default a disclaimer is needed. The system should allow at least two disclaimers: one for one of the U.S. trade entities (sold to and deliver to) and one for foreign entities (manufacturer/producer/grower or exporter/shipper/seller).

CBP and the trade recognize the difficulty in implementing this requirement for low value and informal shipments. Therefore, the requirement for collecting this data must be part of a phased-in enforcement approach over a specified number of years to ensure the trade can fully comply with the new requirements.

The new data elements using the ACE ID as the identifier must be reported on the line item level on both the entry and entry summary transactions.

There needs to be a conversion of the current ACS MID database to the ACE ID. The conversion of the FDA MID should be considered within the scope of this request.

	<p>Create the ability for any trade entity to obtain an ACE ID to help maintain strict confidentiality. The ID can then be given to the broker to file the customs entry.</p> <p>Create the ability to query ACE to determine if an ACE ID already exists to avoid duplicating IDs. Certain identifying information would need to be submitted in the query request to ensure confidentiality of information. Also, there needs to be rule to determine who can query ACE IDs. Query capability should be allowed using ABI and other mechanisms such as EDI and the Secure Data Portal.</p> <p>Create the ability to update and inactivate the ACE ID. There needs to be rules to determine who can update the ACE ID. Update capability should be allowed using ABI and other mechanisms such as EDI and the Secure Data Portal.</p> <p>In an effort to keep ACE IDs current, the following rules should apply:</p> <ul style="list-style-type: none"> <li>• If an ACE ID shows no activity in 12 months, CBP should inactivate the ID. The party that created and the owner of the ID should be notified of CBP’s intent to inactivate the ID 30 days prior to the close of the 12 months inactive period.</li> <li>• After 18 months of continual transactions involving an ACE ID, CBP should send the party that created and the owner of the ID notice to verify all information used to create the ID is still current and correct. CBP should send this notice 30 days prior to the close of the 18-month period.</li> </ul>
<b>Benefit of Change:</b>	This will allow better targeting analysis so CBP can make better screening, exam, etc. decisions up front. Some of the requested functionality will allow the trade to maintain accurate, confidential trade information that is critical for CBP.
<b>Impact Assessment:</b>	Unknown at time of entry in tool.

[System/Subsystem](#)

System:	ACE	Cargo Business Area:	Cargo Release
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## Implementation Requirements

Needed By Date:	A2, A3	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:	
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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:

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