Great Idea Form

Requirement Summary

GIF:	**CSPO-GIF-1092**	**Status:**	Pending CBP Change Control Board (CCB) Review	**Submit Date:**	October 23, 2009
Title:	ENT-068-A2.4-Ultimate Consignee and MID				

Origination

Requirement Initiator:	Don Woods
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Initiator Phone:	
Sponsor:	Monica Crockett

Source:

Source:
Trade Request

Business Sponsor

Business Office:	
Executive Director for the Business Office:	

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:	**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.** **Ultimate Consignee:** CBP OFO proposes the elimination of the data field "Ultimate Consignee" and its replacement with two data fields with corresponding definitions (as below): **"Sold To"**- The named sold to (buyer, purchaser etc) from the invoice at the time of entry. Further defined as the U.S. party causing the importation by reason of establishing a financial interest in the imported goods. For consigned (e.g. "to order of") shipments, household/personal effects shipments, lease transactions and similar contractual arrangements (i.e. those instances where there are no buyers), the identification of the owner or controlling party (e.g. trading agent or commodity broker) of the shipment may be provided in lieu of the actual buyer or purchaser. **"Deliver To"**- The identification of the named party on the

	invoice that will physically receive the merchandise, which may be different from the consignee (e.g. de-consolidator warehouse). **<u>Manufacturer Identification Number:</u>** CBP also proposes the splitting of the current "Manufacturer Identification Number" field into the following two data fields with corresponding definitions (as below): "Manufacturer/Producer/Grower" - . The name and address of the entity that last manufactures, assembles, produces, or grows the commodity or name and address of the party supplying the finished goods in the country from which the goods are leaving. In the alternative the name and address of the manufacturer (or supplier) that is currently required by the import laws, rules and regulations of the United States (i.e., entry procedures) may be provided (this is the information that is used to create the existing manufacturer identification (MID) number for entry purposes). 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 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. **<u>"Exporter/Shipper/Seller"</u>** - The last named overseas (foreign) party identified on the transaction invoice/purchase order, that has a financial interest in the goods, and who causes the goods to be shipped by any mode of transport. This is not the transportation shipping party (freight forwarder, consolidator or NVOCC). For consigned shipments, household effects shipments, lease transactions and similar contractual arrangements; the name of the supplier may be provided in lieu of seller information. The supplier could be a trading company, selling agent, owner (e.g. personal/household effects) or similar party.

	The above fields would 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. 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) transactions. The trade entities should be clearly defined and consistent across the entire supply chain and all CBP applications. These definitions should be broad enough to allow for minor modifications for special emphasis programs or PGA definition. Additional defining elements may be added by policy or regulation to meet specific needs when appropriate but should fit within the definitions provided. As an example, in the Interim Final Rule published on 11/25/2008 for the Importer Security Filing, CBP recognized that manufacturer's identify may be unavailable and stated that the supplier of the finished goods in the country from which the goods are leaving could be used as an alternative to satisfy the "Manufacturer". The field was defined to accept either the Manufacturer or Supplier for purposes of the Importer Security Filing. 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 **Identification Numbers:** It is also proposed that the following information be presented to identify the four data fields above : 1. The ACE ID of the appropriate party (see below). 2. The Tax ID, CBP assigned number or social security number of the appropriate party if known (current).

	3. The Dun and Bradstreet (DUNS) number of the appropriate party if known. **New Functionality for ACE ID:** It is further proposed that a new account type and appropriate functionality will be developed that will allow these reference entities to be assigned ACE identification numbers directly from ACE. This should function in two ways: 1. An secure online (portal) functionality that will allow any party to establish their reference file directly with CBP. This will allow these parties to provide their name, address and at least one additional, verifiable unique identifier that is yet to be fully determined (anticipated examples include Social Security number, tax ID number, DUNS number, Drivers License number, Date of Birth, passport number etc.). For foreign addressing, the portal shall provide on-line guidance for registration in identified country's address format. CBP will provide a registration edits to ensure proper addressing. 2. The equivalent process for EDI (including ABI) participants to supply the information when known. **Elimination of the MID Algorithm:** It is also proposed that the current MID algorithm will not be used directly but shall be converted to an ACE assigned identification number. These numbers will be provided to the trade and PGA's once assigned. Future numbers will be assigned as above. **Query Functionality:** For these ACE identification numbers ACE will provide a query functionality that allows participants to input existing information and have matching ACE ID numbers returned. This will prevent duplication and allow trade partners to provide accurate information while preventing personal or trade sensitive information from being incorrectly distributed to unauthorized parties.

	Requirements for Entry/Release and Entry Summary: These requirements also envision that the above data from immediate delivery, entry or release will be reported at time of entry summary as well. The reporting of multiple entities on the line level in the ABI entry summary record similar to the current ability to report multiple Ultimate Consignees on the line level in the cargo release record. To accomplish this, the entity information defined above at the line level on the entry summary must be reported and be consistent with the definitions at the time of entry/release. This parallel reporting will minimize identification issues when the data is provided to state taxation departments. ***(see also, GIF-1091-ENT UC and ACE ID Generation)***
Benefit of Change:	With ACE, the opportunity exists to better define and use information to perform better targeting and reporting of all trade entities. Having consistent definitions of trade entities across the supply chain and CBP applications will improve existing business processes for both CBP and the trade. Of particular concern is the data element "Ultimate Consignee" which has been difficult to define consistently for entry and entry summary. The current definition of Ultimate Consignee at the time of immediate delivery entry or release is the party in the U.S. to whom the overseas shipper sold or consigned the imported merchandise. The reported information is for the party in the U.S. to whom the overseas shipper sold or consigned the imported merchandise. If the merchandise has not been sold or consigned, it is the proprietor of the U.S. premises to which the merchandise is to be delivered. This two-stage definition indicates that more than one data element is required in this field. Similar problems exist in the data field "Manufacturer/Shipper Identification" (MID) where the appropriate party must be identified and selected. There is also a problem with duplicate records caused by the creation of the MID algorithm.
Impact Assessment:	Unknown at time of entry in tool.

System/Subsystem

System:	ACE	Cargo Business Area:	Entry

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:	
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:	

Action Descriptions

Document History

Action History

Date:	User Name:	Note:

Update History

Date:	User Name:	Note: