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# Great Idea Form

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## Requirement Summary

GIF- 920		Status:		Submit Date:	July 14, 2009
Title:	CSPO GIF 920 (ENT-019) Trade Records as "Release Control" Function				

## Origination

Requirement Initiator:	Art Litman
Initiator Email:	litman@customsdvice.com
Initiator Phone:	
Sponsor:	Kim Santos, CBP; Valarie Neuhart, CBP

## Source:

Source:
Trade Request

## Business Sponsor

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

## CSPO Planning

<b>Change to CSPO System?</b>	
<b>Change Planned?</b>	<b>Where/When Planned? M2.3</b>
<b>Assign to System:</b>	<b>Assign to Release/Delivery:</b>

## Requirements Description

<b>Business Area:</b>	
<b>Request Type:</b>	Business Need
<b>Impacts Trade?</b>	Yes
<b>Description of Change:</b>	<p>The Trade's records can serve the "release control" function required by Customs. (For example, Customs and Census want to know that an importer who declares a \$1,000 dollar release is not following up with a \$1 million dollar summary) From a trade perspective, unless goods are truly inadmissible and the "release control" function data are related to a decision to examine for admissibility, the variance between release data and summary data in Customs system is immaterial, providing that the summary data is accurate. Importers fully acknowledge that they must fully and accurately declare summary data for each and every article imported and must, therefore, utilize their own release control functions. During TSN Entry Process meetings, agreement was reached that although Customs will continue to require the release control function in ACE for the foreseeable future, an exception may be allowed for qualifying importers who can prove that they have a verifiable internal control system that insures full linkage between release and summary for all imports into the US.</p>

	<p>The ACE system must be flexible enough to waive the “release control” function for qualifying importers who satisfy requirements for internal release control functions. Such waiver shall take the form of an ACE de-linkage between release and summary data. In any event, the release control function is to insure that filers follow up with summary data for each release. It does not mean that the data must always match exactly, as it is normal to see some variance within the ordinary course of business. For example, validation of data between release and summary will often disclose errors which are corrected at summary. Therefore, the system must be flexibly programmed to allow for variances. Actual tolerances will be determined as a matter of policy at a later date. It is foreseeable that the tolerances may change over time. Further, when importers file adjustments (e.g., Reconciliation), they are reconciling to summary data (e.g., IASS data), not release data. See page 5 of 7 of June12-13, 2001 Meeting Report of Entry Process Subcommittee.</p>
<b>Benefit of Change:</b>	
<b>Impact Assessment:</b>	

## System/Subsystem

<b>System:</b>		<b>Cargo Business Area:</b>	
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## Implementation Requirements

<b>Needed By Date:</b>		<b>Change Urgency:</b>	
<b>Level of Effort:</b>		<b>Cost Estimate:</b>	

## Sponsor Recommendation

<b>Sponsor Recommendation:</b>	
<b>Sponsor Comments:</b>	

## 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:
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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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