

Advance Trade Data Initiative (ATDI)

Security Filing Test Program

U.S. Customs and Border Protection Perspective

Presented by Seunghyun (Joey) Eom

October 30, 2008



ATDI Security Filing File Formats

Filing Option	Message Type/Version
Container Status Messages (CSM)	
Stand-alone	ANSI X.12 315 (4010, 5010)
Stand-alone	ANSI X.12 322 (4010, 5010)
Stand-alone	UN/EDIFACT CODECO, COARRI
Vessel Stow Plan	
Stand-alone	UN/EDIFACT BAPLIE D91.1 (SDMG 1.5)
Stand-alone	UN/EDIFACT BAPLIE D95B (SDMG 2.07)
Importer Security Filing 10 (ISF-10)	
Stand-alone CATAIR	CATAIR SF
Unified Entry	CATAIR HI
Unified Entry Summary	CATAIR EI
Unified FTZ	CATAIR FT
Stand-alone CAMIR	CAMIR SF
Stand-alone X.12	X.12 309
Importer Security Filing 5 (ISF-5)	
Stand-alone CATAIR	CATAIR SF
Stand-alone CAMIR	CAMIR SF
Unified Manifest	CAMIR MI
Unified Manifest	X.12 309



ATDI Security Filing Enrollment Process

- Contact an Enrollment Team member (Peggy Rutledge, Chuck Miller, Joey Eom) for Enrollment Packet
- Execute the Memorandum of Teaming Agreement (MOTA)
 - MOTAs must be on file for all participants, including Software Vendors/Service Providers, Brokers or other authorized agents, Importers, Carriers, NVOCCs/Freight Forwarders
- Select file format(s) – available on CBP.gov
 - http://www.cbp.gov/xp/cgov/trade/automated/automated_systems/sf_transaction_sets
- Schedule Technical Call(s) with Joey Eom – (703) 553-1581
- Submit sample file via e-mail to Joey Eom for manual review – Seunghyun.Eom@cbp.dhs.gov
- Submit test file via ABI or AMS
- Activate production data stream



Security Filing Enrollment Process (Post- Final Rule)

- Existing Filers, i.e., Current ABI/AMS Filers
 - Interconnectivity Security Agreement (ISA) may need to be updated; contact Interconnection Security Agreement (ISA) Coordinator
- New Filers without an Existing ABI/AMS Profile
 - Letter of Intent to Client Representative Branch
 - Approval



Security Filing Requirements

- Stow Plans (BAPLIEs)
 - SMDG 1.0 – 3.0
 - Submit to CBP within 48 hours of vessel departure from last foreign port prior to U.S. arrival
- Container Status Messages (CSMs)
 - Submit/Forward to CBP within 24 hours of receiving CSM in your system
- Importer Security Filing (ISF)
 - File at the lowest bill level (House or Regular) for a single Importer of Record
 - Submit ISF to CBP 24 hours prior to container lading at last foreign port prior to departure for U.S.
 - All ten (10) data elements must be provided
 - Manufacturer, Commodity, and Country of Origin must be linked



ATDI Security Filing Statistics

As of Friday, October 17, 2008...

- 59,256 ISFs received
 - Two response messages currently implemented
 - SN Accept/Reject of ISF input message, including error reason codes and descriptions
 - SA Status Advisory indicating AMS Bill matches
- 1,252 Stow Plans received
- 104 million CSMs received



Importer Security Filing Data Compliance

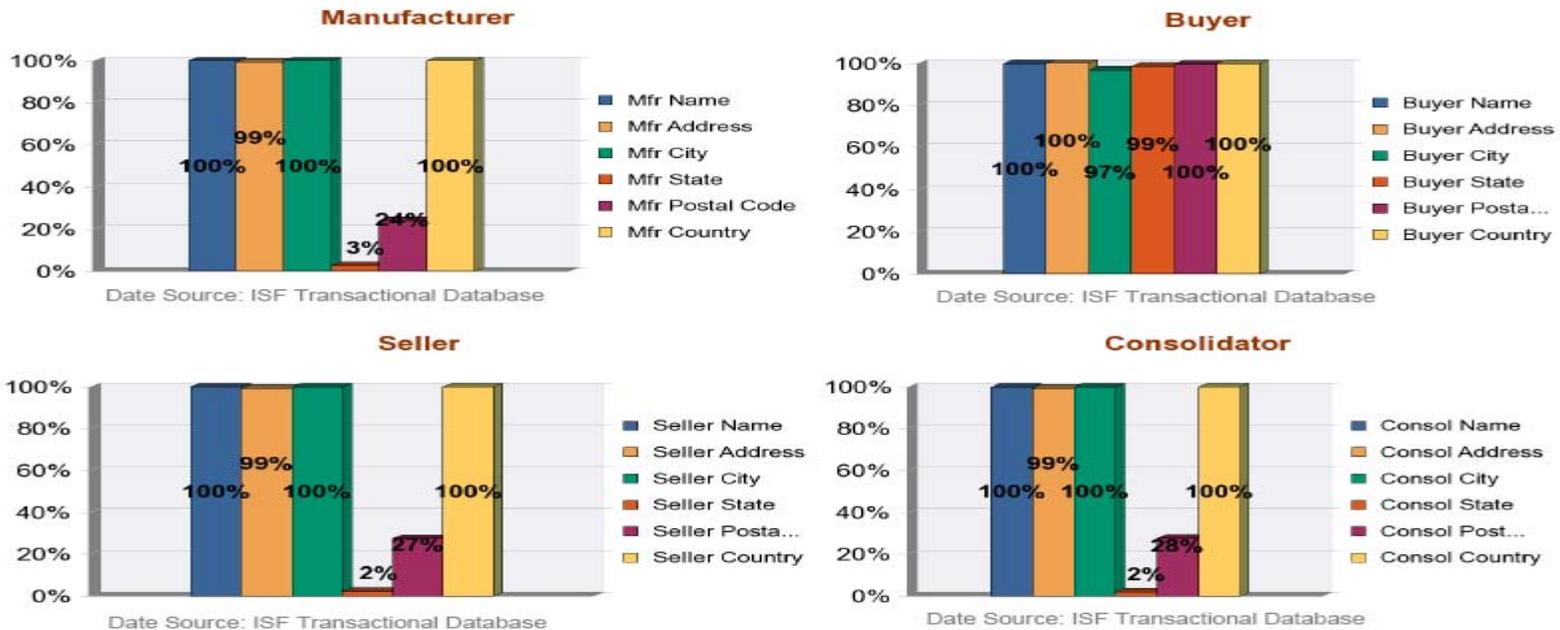
Importer Security Filing (ISF-10) Data Compliance

Page 1 of 1

Refresh Date: Oct 20, 2008 1:14:48 PM
Print Date: Oct 20, 2008 1:15:05 PM

Summary Profile

Frequency of ISF-10 Message Data Elements Received



Importer Security Filing Data Compliance (Cont'd)

Container Stuffing Location



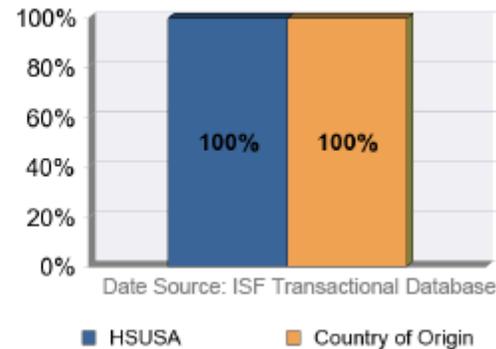
Ship To Location



IOR / Consignee



HSUSA / Country of Origin



Security Filing Importer Report Card (Page 1)

**Importer Security Filing (ISF-10)
Importer Report Card (Summary)
for**



Date Range: 1/4/08 - 8/6/08

Refresh Date: Sep 25, 2008 9:27:12 AM
Print Date: Oct 20, 2008 1:18:18 PM

A. Transaction Volumes (Overall)

Number of ISF-10 Filings Received Per Month

Message Format	2008	2008	2008	2008	2008	2008	2008	Total
	01	02	04	05	06	07	08	
CM-SF				82			2	84
CT-FT			15					15
CT-SF			181	7	3	9		200
	13	12						25
Total	13	12	196	89	3	9	2	324



Security Filing Importer Report Card (Page 2)

Importer: [REDACTED]

B. Timeliness Performance (Overall)

* Comparison of ISF-10 Filing Date to Bill Filing Date

Frequency of ISF-10 Filings by Number of Days Leading/Lagging Bill Filing Date

Message Format	Lead 2 days	Lag 9 days	Lag 12 days	Lag 14 days	Total
CT-SF	1	1	1	4	7
Total	1	1	1	4	7



Security Filing Importer Report Card (Page 3)

Importer: [REDACTED]

C. Accept/Reject Message Counts (Overall)

Proportion of ISF-10 Filings Accepted vs Rejected

Message Format	Accepted	Accepted (Not Validated)	Accepted (With Errors)	Rejected	Total
CM-SF	37	9	33	5	84
CT-FT	3	6	4	2	15
CT-SF	78	42	66	14	200
		25			25
Total	118	82	103	21	324



Security Filing Importer Report Card (Page 4)

Importer: [REDACTED]

D. Message Compliance (Overall)

ISF-10 Data Element	Percentage Received					
1. Buyer name and address	Buyer Name	Buyer Address	Buyer City	Buyer State	Buyer Country	Buyer Postal Code
	100.0%	100.0%	100.0%	0.0%	100.0%	100.0%
2. Seller name and address	Seller Name	Seller Address	Seller City	Seller State	Seller Country	Seller Postal Code
	100.0%	100.0%	100.0%	0.0%	100.0%	0.0%
3. Container stuffing location	Cntr Stuffing Name	Cntr Stuffing Address	Cntr Stuffing City	Cntr Stuffing State	Cntr Stuffing Country	Cntr Stuffing Postal Code
	100.0%	100.0%	100.0%	0.0%	100.0%	0.0%
4. Consolidator (stuffer) name and address	Consolidator Name	Consolidator Address	Consolidator City	Consolidator State	Consolidator Country	Consolidator Postal Code
	100.0%	100.0%	100.0%	0.0%	100.0%	0.0%
5. Manufacturer name and address	Manufacturer Name	Manufacturer Address	Manufacturer City	Manufacturer State	Manufacturer Country	Manufacturer Postal Code
	93.7%	93.7%	93.7%	0.0%	93.7%	0.0%
6. Ship to name and address	Ship To Name	Ship To Address	Ship To City	Ship To State	Ship To Country	Ship To Postal Code
	100.0%	100.0%	100.0%	0.0%	100.0%	100.0%
7. Importer of record number	IOR Number					
	100.0%					
8. Consignee number	Consignee Number					
	100.0%					
9. Country of Origin	Country of Origin					
	100.0%					
10. Commodity HTSUS Number	HTSUS Number					
	100.0%					



Common Technical Issues/Questions

- Data Linking
 - No requirement to link bills to containers or bills to parties or containers to parties
 - Manufacturer must be linked to Commodity(ies) and Country of Origin
- Looping for Multiple Parties
 - Repeat Party/Entity Loop (SF30 record – SF36 record) for multiple parties
 - Repeats up to 999 times
- Communications
 - ABI and AMS are the current approved methods for transmitting Security Filing data to CBP



ATDI Security Filing Summary Information

- Draft technical formats:

http://www.cbp.gov/xp/cgov/trade/automated/automated_systems/sf_transaction_sets/

- Submit technical questions to:

security_filing_technical@cbp.dhs.gov

- Onboarding Team contact information:

PERSON	ROLE	E-MAIL	PHONE
Peggy Rutledge	Business Contact	margaret.a.rutledge@cbp.dhs.gov	703-553-6626 (o) 908-601-0838 (c)
Chuck Miller	Business Contact / MOTA Questions	charles.j.miller@cbp.dhs.gov	703.553.1772 (o) 510.915.4778 (c)
Joey Eom	Technical Issues	seunghyun.eom@cbp.dhs.gov	703-553-1581 (o)



ATDI Test Results

Expeditors International of Washington, Inc.



Analysis: Testing History

Expeditors International of Washington, Inc.

- ❑ **Expeditors began testing ATDI with CBP with PO data in Spring 2006.**
- ❑ **Expeditors extended its ATDI testing to include the 10 Importer Security Filing data elements in early 2007.**
- ❑ **Importers were not asked to change any of their systems or processes for the test.**
- ❑ **Test results are based upon the importer's "as is" state.**



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ATDI Test Process

Expeditors International of Washington, Inc.

**IMPORTER
MOTA** **Analyze
Current
"As Is" State** **Validate** **Transmit**



Total Test Clients: Over 75



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Analysis: Data Sources Looked At

Expeditors International of Washington, Inc.

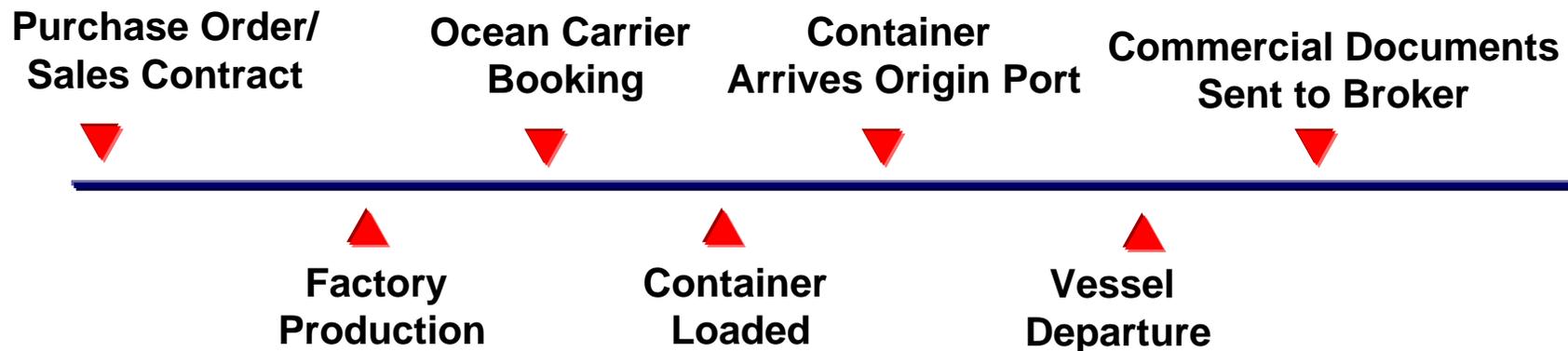
- Electronic Data**
- Packing List**
- Shipper's Letter of Instructions**
- Commercial Invoice**
- Bill of Lading (Bill of Lading Instructions)**
- Arrival Notice**
- Entry Data**
- Parts Database**



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Typical “As Is” Supply Chain

Expeditors International of Washington, Inc.



Depending On Importer's Supply Chain
Security Filing Data Available At Various
Points



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Analysis: Best Case

Expeditors International of Washington, Inc.

Analysis of "As Is" State

Test Phase I

-.5 Day

Test Phase II

-2 Days

Test Phase III

-2 Days

Notes

- Accurate, timely electronic data provided**
- Documents issued and available prior to vessel departure**
- Pre-classification program**
- MBL# or HBL# available**



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Analysis: Worst Case

Expeditors International of Washington, Inc.

Analysis of "As Is" State

**Test
Phase I**

**Test
Phase II**

**Test
Phase III**

Notes

15 Days

9 Days

9 Days

- Documents are not issued/available until days after vessel departure
- No visibility to consolidator/stuffing location
- Missing Bill of Lading number
- Missing HTS#



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Analysis: Test File Average

Expeditors International of Washington, Inc.

Analysis of "As Is" State

**Test
Phase I**

**Test
Phase II**

**Test
Phase III**

8 Days

5 Days

3 Days

Notes

- **80% Accuracy Rate when compared to the Entry Data**
- **Data analysis based on "as is" state only – No system or process changes by Client during the test**



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Attributes of Timely Filing Examples

Expeditors International of Washington, Inc.

- ❑ **Strong compliance program with mechanisms in place for vendor education**
- ❑ **Robust pre-classification program and parts database**
- ❑ **Automated data at some level in order to identify parties**
- ❑ **Timely issuance of commercial documents**
- ❑ **Bill of Lading number available pre-departure**
- ❑ **Strong understanding of the supply chain process**



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Test Profile 1: Large Company

Expeditors International of Washington, Inc.

- **Large multinational company that uses Expeditors to manage their international logistics services, including electronic documents management, freight forwarding, consolidation, and clearing.**
- **They cut the purchase orders and have all of the data associated with the entire supply chain.**
- **Because Expeditors is the Broker, HTS data is available in advance of the shipment.**
- **Expeditors reviewed all of this company's data – Purchase Orders, Commercial Invoices, etc. – and created an analysis profile that showed where each data element could be found in this company's electronic information.**



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Test Profile I: Large Company (Continued)

Expeditors International of Washington, Inc.

- **Expeditors then worked with the Importer to determine which vendors or trade lanes they wanted to start providing filings for to CBP. Once that was determined, Expeditors tracked related bookings, collected the data, turned it into a Security Filing (based on information from the company) and submitted it to Customs.**



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Profile II: Medium Company

Expeditors International of Washington, Inc.

- ❑ **A mid-sized company who is not 100% automated, some of the information comes in emails or even in paper.**
- ❑ **A vendor base of several hundred vendors/shippers.**
- ❑ **In some cases, the stuffing or consolidator information that is handled on the seller's side is not available.**
- ❑ **Expeditors reviews the incoming data and determines whether all required data is provided. Expeditors worked with the company to fill any gaps with the best data at the time of filing.**
- ❑ **This company has not made any changes to their supply chain process to support Importer Security Filing.**
- ❑ **Expeditors is working with this company on a gap analysis to determine how all of the information can be collected timely.**



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Profile III: Small Company

Expeditors International of Washington, Inc.

- Small company that orders a similar small number of containers on a regular basis from a single supplier (i.e., two commodities once per month).**
- Because the relationships in the supply chain are constant, it is simple for this company to obtain all of the necessary information, including Stuffing Location and Consolidator, and provide it to Expeditors.**
- As with Test Profile I, Expeditors obtains the booking and starts collecting the data at that point.**



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Thank You

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