
Great Idea Form

Requirement Summary

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|---------------|---|----------------|---|---------------------|-----------------|
| GIF: | CSPO-GIF-727 | Status: | Requirement GIF-727 revised in Dimensions – Pending CBP Change Control Board (CCB) Review | Submit Date: | August 25, 2009 |
| Title: | REV-GIF-O26-A2.3-Financial Report in lieu of Daily Statements | | | | |

Origination

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| Requirement Initiator: | Barry O'Brien |
| Initiator Email: | bo'brien@hasbro.com |
| Initiator Phone: | 401-431-8270 |
| Sponsor: | James Byram |

Source:

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| Source: |
| Trade Request |

Business Sponsor

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| Business Office: | Entry Summary Accounts & Revenue |
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| Executive Director for the Business Office: | James Byram |
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CSPO Planning

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| Change to CSPO System? | |
| Change Planned? | Where/When Planned? |
| | |
| Assign to System: ACE | Assign to Release/Delivery: A2.3 |
| ACE | Entry Summary Accounts and Revenue (ESAR) |

Requirements Description

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| Business Area: | Revenue |
| Request Type: | Business Need |
| Impacts Trade? | Yes |
| Description of Change: | <p><i>It is critical that if the Periodic Daily Statement is eliminated that the Trade be able to receive payment information for all entries via ABI. This information is used for purposes such as ensuring that a filer's import system payable information matches the ABI receivable information (soon to be ACE). Returning the periodic daily statement information will enable reconciliation by the filer during the month so payment may be accomplished timely when the monthly statement is issued. The preferred solution would be retention of the current daily periodic statement. This includes entries showing zero payment due.</i></p> <p><i>However, if the Periodic Daily Statements are eliminated, four reports will be needed to replace the data received from the Periodic Daily Statements. Three of these reports (pertaining to entry status, documents required, and document receipt) will be requested in parallel to this GIF via the TSN Entry Committee GIF#_____.</i></p> <p><i>The fourth report is the subject of this GIF, and is the Financial Report, a true statement that will guide filers as they prepare their Periodic Monthly Statements (PMS). A month's activity of entry filing will be overwhelming without a means to reconcile entries each day or each week, or at specified intervals maintained in the filer's ACE profile, and depending on the individual filer's internal operational requirements. The data elements</i></p> |

for this report should include the following:

- Entry Filer Code
- Periodic Monthly Statement Number
- Statement Date
- Process date
- Payment Due Date
- Pay/Unit Number
- Pay Basis Indicator
- Entry Number
- Entry Date
- Importer Number
- Importer/Broker Name (Statement for)
- Total Amount (per summary)
- Total Duty Amount (per summary)
- Total Tax Amount (per summary)
- Total Antidumping Duty Amount (per summary)
- Total Countervailing Duty Amount (per summary)
- Total Fee Amount (per summary)
- Total Interest Amount For Reconciliation Summary
- Client Branch Designation
- Report Amount Totals (All Summaries).
- District/Port of Entry Summary
- Entry Type
- Broker Reference Number

A portal function is patently unsuitable for filer purposes, however, the same statement information or report information should be available to Importers who are not self filers, whether via the portal, as an email attachment, or other network modality. It is necessary that the **Financial Report be pushed** via ABI/ACE similar to the existing statements at intervals set by the filer (with the possibility for a frequency of no less than daily updates) as for some filers the number of entities requiring this data will make it inefficient to use a transactional system.

Additional Comments:

CBP has proposed the elimination of the periodic daily statement (both preliminary and final). The determination to eliminate the daily periodic statement was apparently unilateral, without trade input, and contrary to submitted trade requirements. The periodic daily statement enables the Trade to reconcile, on a daily basis, duties and taxes owed to CBP on a future monthly statement and allow comparison of CBP entry information (including zero amounts due) to trade import system data. Elimination of this preliminary statement will preclude incremental audit, reconciliation and management of the periodic monthly statement, resulting in a loss of control and due diligence in accounting for duty as well as an insupportable end of month statement process. The Trade has vast experience in time critical reconciliation processes and operates under the principle of performing today's work today. Further, the current periodic daily statement process works well and has a high degree of dependability; its elimination seems an unjustified, unwarranted and reckless approach when considering the complexities of managing a monthly duty payment and the sums involved.

Benefit of Change:

- Reduction in occurrences in failures to "balance" between filers and CBP at the Periodic Monthly Statement due date and the assignment

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| | <p><i>of manpower resources by both CBP and filers for successful resolution.</i></p> <ul style="list-style-type: none"> • <i>Concern continues to exist regarding proof of payment requirement for due diligence under 19 CFR 111.29 that will satisfy CPB's auditors. It is proposed as an alternative that if the periodic daily statement is eliminated, that an ABI message be provided indicating payment of an entry.</i> • <i>Reduction in inconsistencies between broker/importer systems and CBP systems and the assignment of manpower resources by both CBP and filers for successful resolution.</i> |
| Impact Assessment: | Unknown at time of entry in tool. |

System/Subsystem

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| System: | ACS /ACE | Cargo Business Area: | Border Enforcement Management Systems (BEMS) |
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Implementation Requirements

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| Needed By Date: | | Change Urgency: | Critical |
| Level of Effort: | | Cost Estimate: | |

Sponsor Recommendation

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| Sponsor Recommendation: | |
| Sponsor Comments: | |

Board Disposition

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| Date: | Disposition: | Comments: |
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Next Steps:

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| Next Steps: |
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Reasons for Return/Deferral/Withdrawn/Rejection/Forward to PO

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| Reason for Return: | |
| Reason for Deferral: | |
| Reason for Withdrawal: | |
| Reason for Rejection: | |
| Reason for Forward to PO: | |

Secretary Comments:

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| Comments: |
| original sponsor = Don Yando, changed to John Leonard |

Related Items:

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| CR#: | CR Name: |
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| PTR#: | PTR Name: |
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Attachments

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| Attachments: | |
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Action Descriptions

Document History

Action History

| Date: | User Name: | Note: |
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Update History

| Date: | User Name: | Note: |
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