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To <Stephanie.b.dunlap@census.gov>

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Subject Re: 15 CFR Part 30 Regulation interpretation

Dear Stephanie,

Here are the questions I have that I discussed with you this morning.

1. The new rules state that if an export license is required, no post-shipment reporting is permitted. Exporters must report *pre-* shipment. Our client uses export license exceptions to ship many of its products. Given that they are using a license exception, are they therefore permitted to use *post* -shipment reporting?
2. Certain inland freight information is required under the new system. Our client does not have access to this information for many of its shipments. How should we deal with this problem?

Again, thank you so much for you help.

Sincerely,

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1. See section 30.18 (a) of the proposed regulations. Information for items identified on the USML, including those exported under an export license exemption must be filed prior to export. This is in accordance with the ITAR (22 CFR part 121). This policy has not changed from the current policy. See section 30.1 (c) of the Foreign Trade Statistics Regulations. www.census.gov/trade
2. Please see section 30.6 (a)(17)(ii)(B) of the proposed regulations. Where goods are sold at a point other than the port of export (freight, insurance, and other domestic charges required in moving the goods from their U.S. point of origin to alongside the exporting carrier at the port of export) and these costs are not available, an estimate of the costs to move the goods to the port of export shall be made and added to the cost of the goods or selling price to derive the value to be reported in the electronic export information.