



FJR424@aol.com
02/20/2005 07:01 PM

To: jerome.m.greenwell@census.gov
cc:
bcc:
Subject: Frank Reynolds

Hi Jerry:

Put my name as subject in the hope it might get this read. I'll bet you are deluged with questions. Price of popularity.

I dutifully read through the proposed FTR and have three questions. I have a few just-between-us comments that I'll send later, but I would very much appreciate this info. for my column.

1. I see no provision where a buyer appointed forwarder relationship automatically means routed transaction. Therefore, is it possible that a transaction may not be routed despite the involvement of a buyer-appointed forwarder? This is of great importance.
2. Is the 3% rule of thumb dead, or simply not mentioned in the regs? Either way, any objection to my mentioning it (either as something no longer to be used or as an approved method of estimating pre-carriage expenses as the case may be)?
3. Will there be a suggested written authorization from an FPPI in the regs similar to page 115 for USPPI?

I'll be in all day tomorrow if you would prefer to call me at 800 865-6201.

THANK YOU!

Frank



FJR424@aol.com
02/20/2005 07:25 PM

To jerome.m.greenwell@census.gov
cc
bcc
Subject Tidying up

Hi again:

Found a few things you may want to look at. If I'm correct, they are typos rather than the sort of thing one writes official recommendations about.

Pg. 8204

center, Commerce Control List. EAR99 items are not found on the CCL but are controlled by BIS.

right, Distributor. A distributor is not necessarily an agent, in fact usually isn't.

Pg. 8205 right, Loading document: Not all loading documents are documents of title.

Pg. 8206 left, NAFTA among not between.

left, Port of Export ...or CBP airport...(not of)

right, Split Shipment Can't this happen with ocean container consolidations too?

Pg. 8207 left Wholesaler/Distributor is not necessarily an agent

Pg. 8215 left iii Exclusions Excluding the cost of vessel loading can be a big problem for pre departure filers who ship freight prepaid. They are included in terminal handling charges, which are usually billed as a freight surcharge and are unknown until the freight bill or bill of lading arrives which usually happens 5 to 10 days after the vessel sails. (A written recommendation may be appropriate for this point, unless of course we can continue using the 3%.

Great job. This is an amazingly small number of questions for a very detailed document of this size. I do a fair amount of editing, and catch most questionable items.

Frank