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Jr/FTD/HQ/BOC
03/29/2005 06:52 AM

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cc

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Subject Fw: Comments on NPR for AES

FYI

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----- Forwarded by C Harvey Monk Jr/FTD/HQ/BOC on 03/29/2005 06:50 AM -----



Terri Bartle
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03/28/2005 04:14 PM

To "c.harvey.monk.jr@census.gov"
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cc Terri Bartle <TERRI.BARTLE@geosbush.com>

Subject Comments on NPR for AES

Dear Harvey,

- > I first wish to thank you again for coming to Portland to discuss these
- > new regulations that are forthcoming. The seminar was great and we have
- > had many positive comments about your and Ian's presentation. Thank you
- > for helping to keep Portland and the CRCBFA on the cutting edge, we
- > appreciate it very much.
- >
- > I do have some comments about the AES NPR, and suggestions. Please note
- > the following.
- >
- > 1) We very much like the idea of having a registration number issued that
- > can be used in place of the EIN or Social Security Number, etc. I would
- > however suggest that if you could make an "R" for Registration Number an
- > Indicator like we use now for "E" for the EIN number, or "T" for a FPPI,
- > while keeping the amount of digits the same (11), then it would easier to
- > program the change. It also makes sense to retain or change this
- > information in this screen.
- >
- > 2) We would like to see it made mandatory for all carriers, VOCC's or
- > NVOCC's, to provide the transshipment port at the time of booking. We,
- > the forwarder and/or PPI rely on this information to provide accurate
- > information to Census and CBP, but always have to dig to get it and it is
- > often wrong. This data element should become part of a carriers booking
- > repertoire. Since it is incumbent upon the Forwarder and PPI to share this
- > information with Census and CBP, then makes sense to me that the people
- > with the knowledge (carriers) must share with us at the time of booking.
- >
- > 3) Geo. S. Bush, uses DCS software as our ABI interface with Census/CBP,

> and we file our AES via this system. We would like all AES systems to
> have the capacity to print out proof of the AES transmission, just like
> the current AES Direct System does. We have customers that have used AES
> Direct in the past and liked the print out it provides outlining what was
> sent to AES on their behalf. I am seeking to duplicate this AES
> transmission output on all AES systems.
>

> 4) Voluntary Disclosure: It would be nice for a forwarder to be able to
> help a client and Census without subjecting themselves to fines and
> penalties specific to late filed shipments where the forwarder acts solely
> as the conduit to Census/CBP. We had an example during the seminar of a,
> "what if you got a call from one of your best clients who just became
> aware of a shipment with no AES filed". Rather than declining to assist
> them, it seems more prudent to get the information to Census/CBP asap upon
> discovering the oversight. Regulatory protection is sought for a
> Forwarder that simply acts on behalf of the shipper as the conduit to
> Census/CBP, in an effort to make the information known at the earliest
> moment. If you do not protect the Forwarder in this regard they will
> choose not to be party to the transaction and will not provide any
> information to Census on these shipments; one's that were completely the
> shippers fault. It simply costs too much money to protect yourself in
> court, even if you are in the right.
>

> 5) Lastly, we believe when a USPPI allows the forwarder on a "Routed
> Shipment" to file AES on their behalf, then that Routed Forwarder needs to
> provide that USPPI with a copy of what was filed on their behalf within a
> timely manner (suggest within 5 days of sailing). I believe that
> regardless of what the USPPI provides to a Routed Forwarder there will be
> many cases where AES does not get filed, or is filed incorrectly. I
> believe that if you make the Routed Forwarder take on the responsibility
> of proving what they filed to the USPPI, you will see accuracy and
> visibility become elevated greatly. Too many of these little shops that
> claim to file on these routed shipments, do not, don't care about the
> integrity of the information, or often disappear into thin air when you go
> back for more information. Maybe being able to attach their bond for
> these kinds of infractions should be considered as well.
>

> Well, Harvey, that is all for now. Please let me know if you have any
> questions or comments.
>

> Best Regards,
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