



STRACHAN SHIPPING AGENCY

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**Comment to the Bureau of the Census
On its
Notice of Proposed Rule Making
For
Mandatory Automated Export System (AES) Filing
for all Shipments Requiring Shipper's Export Declaration Information
(Docket Number: 031009254-4355-02)
(RIN 0607-AA38)**

To whom it may concern:

Many exporting ocean carriers voluntarily file export manifest information electronically to Customs and Border Protection (CBP) via the agency's AES Vessel Transportation Module (VTM). Filing electronic export manifest information frees the exporting carrier from the requirement to file a paper manifest. Carriers who choose to use the VTM have largely made their export documentation processes completely paperless. It would cause difficulties with these paperless documentation processes if these carriers were unable to receive proof of filing citations (i.e. the Internal Transaction Number) electronically from CBP and/or Census once the USPPPI has submitted the required Electronic Export Information (EEI).

We request confirmation that the ITN number will be provided to VTM participating carriers via that system, so those carriers would not need to develop manual processes for capturing that information. If CBP and Census' systems do not yet have the capability to provide the ITN electronically to VTM users, we strongly recommend that the necessary programming adjustments be made prior to the date the final rule will take effect.

We also note that providing this functionality would be an additional incentive for exporting carriers to use the VTM rather than maintaining their paper-based systems, which are labor intensive and create additional costs to industry and government.

Sincerely Yours,

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