

Agency : CENSUS BUREAU

Title : Foreign Trade Regulations: Mandatory Automated Export System Filing for All Shipments Requiring Shippers Export Declaration Information

Subject Category : Foreign trade statistics: Automated Export System; shippers export declaration information; mandatory filing requirement

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Phase : PROPOSED RULES

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Author : Mr. Rajiv Garg

Organization : Vilden Associates, Inc.

Mailing Address :

Comment : 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:

Vilden Associates, Inc. is the leading software provider to the transportation industry, our Maritime software is used by NVOCC and Global Liner/ steamship Lines and Agencies all over the world.

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 USFPI has submitted the required Electronic Export Information (EEI).

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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.

We can have more Ocean carriers participate in filing of electronic export manifest using VTM if there are incentive to do so. This will provide them greater incentive to file export manifest electronically than to file the paper manifest; as being currently done today.

Thanks for your consideration.

Sincerely Yours,

Rajiv Garg
Chief Operating Officer
Vilden Associates, Inc.
2525 Cherry Ave. Suite 200
Signal Hill, CA 90755

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