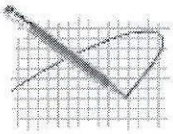
Harvey will Respond To



Dale C Dickerson/FTD/HQ/BOC
04/07/2005 09:53 AM

To Jerome M Greenwell/FTD/HQ/BOC@BOC, Stephanie B Dunlap/FTD/HQ/BOC@BOC, Joey Morales/FTD/HQ/BOC@BOC
cc
bcc
Subject Fw: Questions and comments on FTR

Please see Pat's comments on the mandatory FTR. Please let Pat or I know if you have questions.

Dale

----- Forwarded by Dale C Dickerson/FTD/HQ/BOC on 04/07/2005 09:50 AM -----



"Beasley, Patricia" <patricia.beasley@associates.dhs.gov>
04/06/2005 02:14 PM

To dale.c.dickerson@census.gov
cc diane.c.oberg@census.gov
Subject Questions and comments on FTR

Dale/Diane,
Here are my questions and/or comments on the FTR Federal Register Notice. There are embedded questions that relate to AES requirements that I will need to have answers to as well as several comments. I'm not sure who should get these comments but I am sure you will see that the right people see and response. I can always come out there to discuss if that would be the better approach. By the way, I found the 'seal number' which I told Gerry was missing, under optional elements - so that was my mistake.

Page 8201/3rd column/3rd paragraph:
"Remove requirement for the Date of Arrival....." What does it mean to say "...since shipments sent between the United States and Puerto Rico will no longer be reported differently than other export shipments." ? Currently, AES requires that for shipments from the US to PR, the Estimated Date of Arrival in PR be reported as the Estimated Date of Export. For shipments from PR to the US, the estimated date of departure from the PR port is reported as the Estimated date of export. Is this a requirement change for AES?
Is this the new requirement: US to PR report the estimated date the shipment leaves the US. For shipments from PR to US report the date the shipment leaves PR? Also, the foreign port codes are reported differently - is that changing?

Page 8206 (Definitions)
Port of Export. typo - The seaport of CBP airport where...

Schedule B. ...last sentence "It should also be noted that all import and export codes used by the United States are based on the Harmonized Tariff Schedule (See HTS). Should this read: "are based on the Harmonized Commodity Description and Coding System (HS). ??

Shipment. should 'exporter' read 'USPPI' ? Does it have to be sent "on the same day" ?

Routed Export Transaction. definition reads differently from the one on page 8209. (...and to prepare and file the EEI) Does it matter?

Page 8209/ 1st column (1) USPPI responsibilities.
(iii) Point of origin (State or FTZ) These are two different elements in AES and both are required if it's FTZ shipment. State of Origin on the SC1 record/FTZ Identifier on the SC2 record. Should they be listed separately, cause you need them both in AES?

(x) All licensing information ... do you need to include a reference to the Kimberley Process Certificate Number since it is not covered under the 'other U.S. Government agency' ?? The government does not issue this KPC#.

Page 8209/3rd column 30.4 (a) (5) ... (see 30.1 (c) for a list of definitions that apply to this part) Comment - I expected to see more about the Routed transaction when I went to look there. But all you were really saying was that the definition of Route transaction was there not that there was a list of definitions that apply to route transactions. So I think this is kinda mis-stated and should probably just say "Shipments identified as a routed export transaction as definited in 30.1 (c);"

Page 8210/1st column (2) (v) and (vi) what's the defference? 'cargo shipped by other modes' and 'For all other modes...'

Page 8212/3rd column 30.6 (a) (1) (ii) Address of the USPPI Should address be defined to include the address line, city, state, country and valid zip code?

Page 8213/ top of column 1 - The 'To Be Sold en Route Indicator' is a separte and required data element that indicates Yes or No. Should this element statnd on it's own? AES allows the filer 4 days to report the correct ultimate consignee. Should I remove that requirement from AES since the regulations just say correct as soon as it is known? I think we should leave it at 4 days in AES, then start sending reminders like we do now.

I don't see anything in the FTR about reporting the Mexican State code required if the consignee is country=Mexico.

Page 8213/ 2nd column (7) Conveyance Name/carrier name and the (8) Carrier Identification are 'conditional' elements depending on MOT. Why are they listed with the mandatory elements? Should AESTIR put them under the mandatory element in an ADD Transaction (see AESTIR formats 1a-27 and 28)?

Page 8213/3rd column (9) Port of Export "Use port code 8000 for

shipments by mail." AESTIR says to 'report 8000 or any other valid US port'. Is this a requirement change for AES? Should AES reject ports other than 8000 for mail shipments?

Page 8214/1st column under " (12) Commodity classification number. ....The HTS is a global classification system used to describe most world trade in goods." The HS is global but the HTS is a United States system. Shouldn't this read HS?

Page 8214/2nd column (14) Primary unit of measure ...an "X" is required (If proprietary formats, report "X", if X-12 formats, report "UL" - might be best not to include this instruction here.)

Page 8215/1st column
(23) License Code/license exemption code. Are you considering the new "T12" code for rough diamonds as being 'Federal Government agency requirement?

Page 8215/3rd column (b) Conditional data elements
(5) Export license number/CFR citation/authorization symbol/KPC#
This data element was renamed to include the Kimberley Process Certificate Number. It is not issued by the government. It is issued by the US Kimberley Process Authority. This element needs to be updated.
On page 8216/2nd column (16) Kimberley Process Certificate(KPC) number and authorization sysmbol needs to be removed. The KPC# is captured under the license number field and is not a separate element. This information may need to be moved to page 8215.

Page 8216/1st column
(10) Vehicle ID qualifier. "The qualifier that identifies the type of used vehicle reported." Should read: "The qualifier that identifies the type of used vehicle identifier reported." It doesn't tell you what kind of vehicle is being reported, just rather it is a VIN or a PIN.

Page 8216/2nd column: (viii) DDTC export license line number - this is not yet being reported in AES - it is marked For Future Use.

Page 8217 Does the filing citation for the Authorized Agent have to be an EIN? AES does not require an EIN for the agent - only the USPPI. The agent can be identified with DUNS or SSN.

30.8 (a) Postal exports. Where is the postmaster required to deliver the proof of filing citations?

The LOI in the AESTIR and on the CBP web site will need to be changed to reflect the FTR's LOI changes.
