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To c.harvey.monk.jr@census.gov
cc
bcc
Subject

COMMENT TO THE BUREAU OF CENSUS
On its Notice of Proposed Rule Making for
Mandatory Automated Export Systems (AES) Filing
for all shipments requiring Shipper's Export Declaration Information

DOCKET NUMBER: 031009254-4355-02

RIN 0607-AA 38

Dear Mr. Monk,

Hapag-Lloyd is writing the following brief email comment to the above docket and NPRM.
As you know, Hapag-Lloyd is an active supporter of the automation of export data.
We are an active AES VTM carrier and would like to see the following coments addressed both by CENSUS and Customs and Border Protection, CBP.

Many exporting carriers are going to want to participate in the AES VTM as these rules become final. As the chair of the Ocean Committee of the Customs Electronic Systems Action Committee (CESAC), I can attest to the interest and yet the ongoing frustration we, the ocean carriers share, with using the AES VTM in its current state. The AES VTM needs some help to be the type of system the government and the trade deserves to bring the export paperless transaction to fruition. After over 200 years of paper, we are on the verge of this success.

We need your help to push for enhancements to the existing AES VTM in the following ways:

1. Complete the communication cycle: Programming is needed to provide the ocean carrier the ITN number in the AES VTM. We can expound in greater detail on this in separate correspondence, and through our efforts in CESAC.
   We also note that providing this functionality would be an additional incentive for exporting carriers to use the VTM rather then maintaining their paper-based systems, which are labor intensive and create additional costs to the industry.

2. The AES VTM Error message dictionary needs alot of cleaning up to make it a more effective ONLINE tool.

We also want to simply go on record that every effort should be made to be as clear as possible that there is little to no wiggle room for the definition of "PROPER" export shipping instructions.
This is not an email with a booking number and an AES ITN number. Every effort should be made in the final rules to define the actual export shipping instructions as containing bill of lading instructions from the shipper to the carrier. Carrier then prepare the ocean master bill of lading from these shipping instructions. We demand the trade compliance and will be the front line enforcers. Your Bureaus help in this point of clarity will go a long way to assist us in this compliance effort.

Thank you for your ongoing and strong support of the CESAC meetings. We make an honest attempt to bring the right people to the table to get progress on the automation and modernization "technical" issues of the day. The CENSUS participation at CESAC is very important and as the Executive Chair and the Ocean Chair I sincerely thank you for allocating the staff and resources to attend our meetings.

Looking forward to working with you now and in the future,
Sincerely,
Peggy Rutledge
Director,