Commercial Customs Operations Advisory Committee (COAC)
CBP Experience (CBPX)
Draft Recommendations

<u>**ACE Reports**</u>
1. COAC recommends that CBP provide ACE reporting for all parties on liquidated damages and penalties.

<u>**Automation**</u>
2. COAC recommends that CBP automate enforcement processes in ACE or other environments.
3. COAC recommends that CBP eliminate the need for hand-delivered paper documents that need to be reviewed and stamped (for example: commercial invoices, packing lists, transportation documents, export licenses, etc.) prior to export, to be replaced with a digital method.
4. COAC recommends that an electronic ATA Carnet be created for more efficient processing.
5. COAC recommends an automated process to file a permit to transfer, such as moving goods to a Container Freight Station.
6. COAC recommends that the 520D duty refund filing be automated in ACE, mirroring the current Post-Summary Correction process.
7. COAC recommends that the protest filing process be automated in ACE mirroring the current Post-Summary Correction process.
8. COAC recommends that CBP modernize the payment process so that checks do not need to be sent or received (for example: assisting brokers with ACH refunds on behalf of importers, non-resident importers that cannot cash Treasury checks and for consistency at import port locations).
9. COAC recommends a complete electronic administrative record, including disclosing CBP's action causing a change liquidation, should be available electronically to a surety once CBP makes a formal demand against a surety because a bill has not been resolved in a timely manner by the bond principal. The use of FOIA cuts into a surety's statutory protest deadline.
10. COAC recommends CBP create a searchable database for CSMS messages similar to CROSS.

<u>**Communication and Resources**</u>
11. COAC recommends that CBP consistently update the contact lists for each port on CBP.gov with specific points of contact instead of general phone numbers.
12. COAC recommends that CBP publish and consistently update an online resource for importers to research AD/CVD cases and PGA data that could apply per HTS code.
13. COAC recommends that CBP headquarters encourage ports to host or participate in annual trade days.

Document Imaging System (DIS) Transmission
14. COAC recommends that DIS trigger an alert to the requesting party so that they know that a DIS submission has been received. This would remove the burden for additional communication between the trade and CBP to determine if the request has a response.
15. COAC recommends that CBP review and reconsider the guidance issued in CSMS #50930928 (issued 2/2022) requiring the uploading to DIS of mill test certificates for all shipments of steel and aluminum.

16. COAC recommends that outbound tabletop downtime exercises be held between government agencies and trade partners.
17. COAC recommends that DIS submissions be allowed to replace delivery of all paper documents for PGAs (for example, ATF Form 9).

Export
18. COAC recommends that CBP enforce regulations for vehicle exports consistently across ports.
19. COAC recommends that CBP update the export mitigation guidelines to account for clerical errors.
20. COAC recommends that CBP improve the CTPAT program for exports to provide additional benefits that will aid in export facilitation and targeting high risk shipments involving non-CTPAT parties.
21. COAC recommends CBP consistently review the AESTIR appendices for accuracy.

PGAs
22. COAC recommends that a master PGA data set be created to eliminate redundancies and inefficiencies in filing.
23. COAC recommends that CBP work with FWS to transmit their data elements electronically as part of the Electronic Export Information, moving away from the current paper process.
24. COAC recommends that TSA be incorporated into ACE.
25. COAC recommends that an enhanced message be introduced to allow CBP to easily identify a PGA hold and to effectively communicate those holds with the truck carrier. The burden lies with the carrier, broker and importer having to return goods to the port of export for exam.

Post-Summary
26. COAC recommends that CBP create a process to allow retroactive flagging of reconciliation entries.