Enhanced Air Cargo Advance Screening
Frequently Asked Questions (FAQ)
August 28, 2024
V1.0

BACKGROUND

On August 21, 2024, an updated version of the Air Cargo Advance Screening (ACAS) Implementation Guide (IG) was published on the U.S. Customs and Border Protection (CBP) CBP.gov website. To assist the trade community in understanding the expectations of CBP concerning the new "Enhanced ACAS Security Filing", CBP is providing this interim frequently asked questions (FAQ) document as guidance. Please note that CBP's responses to the FAQs are for informational purposes only; they may be changed or updated at any time and are legally non-binding. For more information on the ACAS IG, please visit: https://www.cbp.gov/document/guides/air-cargo-advance-screening-acas-implementation-guide

1.   What is an Enhanced ACAS Security Filing?

CBP and its partners at the Transportation Security Administration (TSA) jointly administer the ACAS program at the National Targeting Center (NTC) in Sterling, VA. An Enhanced ACAS Security Filing (ACAS SF) provides additional data that better identifies the parties involved in the air cargo supply chain prior to cargo being loaded on board a U.S. bound aircraft.

An Enhanced ACAS SF typically includes most of the following data elements:

Party Contact Information

These fields give contact information for the cargo shipper and consignee and should be transmitted in the SHP or CGN records. The data generally exists, or should exist, for established relationships between the <u>actual shipper</u> of the goods and the party filing the ACAS data.

1. Shipper E-mail (EML)
2. Shipper Phone Number (SHP – Table 11)
3. Consignee E-mail (EML)
4. Consignee Phone Number (CNE – Table 12)

Shipper Account Information

These fields give information about the Shipper Account. The data generally exists, or should exist, for established relationships between the actual shipper of the goods and the party filing the ACAS data (e.g., air carrier, freight forwarder, customs broker, service center, etc.). This is generally the information that the logistics provider creates and maintains regarding its customers and is often relied upon to ensure that the logistics provider gets paid for its services.

5. Shipper Account Name (SHP or ESA if different)
6. Shipper Account Issuer (ISR)
7. Shipper Account Number (ATY)
8. Shipper Account E-mail (EML)
9. Shipper Account Phone Number (TEL)
10. Shipper Account Type (ATY)
11. Verified Known Consignor (KP) (if it exists)
12. Shipper Account Establishment Date (EST)
13. Shipper Account Billing Type (BLT)

Other Identity Information

These fields may apply to any party on the submission, including the shipper or shipper account.

14. IP Address (or MAC Address) of the device when the Shipper Account was created
15. IP Address (or MAC Address) of the device used to file the ACAS Filing each time an ACAS Filing is submitted – especially in the case of self-filers.
16. Bio Data (Proof of Identity/Gov/t Issued Document Number, Document Country, D.O.B.)

Optional Data Recommended to provide facilitation benefits

17. Regulated Agent (Yes or No)
18. Regulated Agent Code
19. Regulated Agent Name
20. Regulated Agent Address
21. Origin of Shipment
22. Shipment Value – Declared or Estimated
23. Shipper MID or AEO Number
24. Consignee Number (CBP Importer of Record Number or similar number)
25. Commodity HTS Code and related information (CAMIR CSD record or Cargo-IMP HTS record).

Note: some of the Enhanced ACAS Security Filing data elements are part of the customs entry. The earlier the entry data is provided to CBP, the earlier facilitation benefits can be applied. As a reminder, the ACAS program is solely focused on air cargo security. Any entry data provided through the ACAS program will only be used for security purposes.

2.   What is the benefit of an Enhanced ACAS Security Filing?

The benefits are twofold – it promotes lawful international trade and reduces the risk of terrorism by providing CBP and TSA with significantly better information earlier in the supply chain process. Entity identification is enhanced by leveraging business relationships that naturally exist between the actual shippers and their logistics providers. The Enhanced ACAS Security Filing also provides industry the opportunity to identify the actual consignees much earlier in the supply chain process. Taking steps to vastly improve entity identification is critical to help CBP properly segment risk by identifying the highest-risk and lowest-risk shipments prior to these shipments being loaded on an aircraft. Identifying entities earlier in the process also helps the trade to better secure their supply chains and protect their employees and customers.

3.   Who is responsible to file an Enhanced ACAS Security Filing?

The same entity who is currently responsible for filing the ACAS Security Filing.

> "Any other entity in possession of required ACAS data that is not the inbound air carrier, or a party described in paragraph (c)(2) of this section must fully disclose and present the required data for the inbound air cargo to either the inbound air carrier or other eligible ACAS filer, as applicable, which must present such data to CBP."

The definitions of the mandatory and conditional ACAS data elements are set forth in §122.48a and §122.48b and are to be **submitted at the lowest air waybill level**.

Note: In addition, CBP recommends that the air carriers also provide an Enhanced ACAS Filing at the Master air waybill level to better identify the freight forwarders and logistics providers they are working with. At the very least, a *Shipper Account Number* should be provided. In many cases, these entities are recognized Regulated Agents.

ENHANCED DATA ELEMENTS

4.   What is the Shipper Account Name?

The *Shipper Account Name* in the vast majority of cases will be exactly the same as the actual shipper. This data element will be directly tied to the *Shipper Account Issuer* and the *Shipper Account Number* to identify the new entity known as "Shipper Account".

5.   Which party's "Shipper Account" information are you really trying to obtain?

CBP wants to know the account information for the relationship that exists between the actual shipper and the party responsible for filing the ACAS Security Filing. This is the internal account number assigned by the freight forwarder, customs broker, air carrier, service provider, etc. to the actual shipper.

Five common scenarios have been identified in the air cargo environment:

  A. **Direct Relationship with Carrier –** In this scenario, the actual shipper has a direct relationship with the air carrier and the air carrier provides full logistics services to the actual shipper. The air carrier establishes an account directly with the actual shipper. For these shipments, the carrier files a simple air waybill as well as the Enhanced ACAS Security Filing.

  B. **Freight Forwarder /3PL (HAWB) –** in this scenario, which is the most common for non-express air cargo shipments, a freight forwarder (or similar party) has the direct relationship with the actual shipper. In these cases, the actual shipper creates a customer account with the freight forwarder or similar party.

  C. **Self-Filer Scenario –** This is the most common "express" shipping scenario due to the exponential growth of online shopping as well as the end-to-end business models of express shipping companies. A shipper (and a consignee on the other end of the transaction) creates an online account with a freight forwarder, customs broker or other 3rd party logistics provider. In these cases, an initial account is set up which typically includes basic account information to include the establishment of an account number. In industry best practices, a contact phone number and e-mail are collected, of which at least one is validated (e.g., two-factor authentication).

  D. **Self-Filer Internet Guest Log-on –** A user signs on to the website of a 3rd party logistics provider via a guest account, sets up a shipment and prints out a label. While an account number may not be assigned, the 3rd party logistics provider collects minimum details such as party contact information. In this

scenario, the *Shipper Account Number* <u>may be left blank</u> if none is presented. However, the filer of the Enhanced ACAS Security Filing needs to clarify that *Shipper Account Type* was a Type "I" - Immediate Transaction. In terms of best practices, and for supply chain security purposes, 3rd Party logistics providers should take steps to significantly limit or even consider eliminating this practice. Where no *Shipper Account Number* exists, *Bio Data*, in the form of a government issued identification document (w/ Name, Address, date of birth, ID type, ID Number, ID issuer, etc.) and an Internet Protocol Address should be collected.

E. **"Walk-in" to a Store Front –** A customer brings a package to a store front to ship. The store front takes care of the shipping and handling. In this scenario, the *Shipper Account Number* <u>of the store front or shipping outlet</u> would be provided, and the *Shipper Account Type would* be <u>"S" Shipping Outlet – Walk-in</u>.

Where no *Shipper Account Number* for the actual shipper exists, *Bio Data*, in the form of a government issued identification document (w/ Name, Address, date of birth, ID type, ID Number, ID issuer, etc.). Alternatively, these customers should be encouraged to create an account.

6.   Who is the Shipper Account Issuer?

The *Shipper Account Issuer* is simply the party that created or assigned the account number to the actual shipper. It is most likely the same entity that is responsible for filing the ACAS Security Filing. For the vast majority of transactions, the *Shipper Account Issuer* is the freight forwarder, customs broker, air carrier, service provider, etc.

7.   What is the Shipper Account Establishment Date?

The date the account was originally established. For older accounts where only the year is known, you may fill in 01/01/**YYYY**.

8.   What is the Shipper Account Type?

The *Shipper Account Type* describes the nature of the business relationship between the actual shipper and their service provider (e.g., carrier, freight forwarder, customs broker, service center, or logistics provider) – usually the filer of the Enhanced ACAS Security Filing. The following 5 types are currently recognized:

S - Shipping outlet/walk-in
I - Immediate transaction (e.g., guest account - internet transaction)
O - Occasional shipper (i.e., established account, but infrequent use)
B - Regular/daily shipper
R - High-volume shipper

9.   What is the Shipper Account Billing Type?

The Shipper Account Billing Type details how the shipping transaction was paid for.

EFT - Electronic Funds Transfer
CC - Credit Card/Debit Card
CSH - Cash payment
BILL - Periodic billing

10.   What is a Verified Known Consignor (KP)?

This is the same party as the Known Consignor described in Regulation (EU) 185/2010. Known Consignor status is a designation given to a shipper of mail or freight who can ship on their own account and meet the security standards and regulations for transporting their cargo by air. This status can be a symbol of trust and quality, and it can help boost customer confidence in a company's ability to transport goods safely. To be considered for Known Consignor status, businesses must meet certain criteria set by the Civil Aviation Authority (CAA). Once granted, Known Consignors are subject to annual validation audits by a CAA Aviation Security (AvSec) Compliance Auditor. These audits usually take place within two months of the expiry date but may be earlier. During the audit, the auditor will review the company's secure processes, as well as their recruitment and training of AvSec staff. Known Consignor licenses are valid for a maximum of 12 months and must be renewed with the CAA after that time.

CBP requires that the status be proven upon submission by the provision of a designated code.

If the shipper does not qualify for this status, simply do not transmit this data element.

11.   What is a Regulated Agent?

An air cargo regulated agent (RACA) is a company or entity that handles air cargo and provides security controls to protect the aviation industry from unlawful interference or crime. RACAs are responsible for examining, clearing, and securing air cargo for loading onto aircraft. They also ensure that the goods in a consignment match the description

provided by the consignor and that the consignment doesn't contain any prohibited or dangerous items.

RACAs can include:
- Air freight forwarders and couriers
- Air cargo handling companies
- Air cargo carriers and handlers, especially airlines
- Logistics service providers

RACAs can obtain a special legal status to make it easier to handle air cargo at airports. The legal basis for this status is Regulation (EC) No. 300/2008 and the German Aviation Security Act (LuftSiG).

12.   What if the actual shipper does not have an account?

Outside of a shipping outlet "walk-in" or immediate shipping situation (e.g., printing a shipping label from a guest log-in), most regular shippers have accounts with their logistics providers. Even self-filers that use an internet-based marketplace that matches up buyers and sellers have accounts and internal account numbers assigned by their service provider. These accounts help ensure that the logistics providers get paid for services rendered.

In a shipping outlet situation (sometimes referred to as a "walk-in") where an actual shipper may not have an account, the *Shipper Account Name* and *Shipper Account Number* for the shipping outlet may be provided instead. In these cases, the *Shipper Account Type* must be coded as a type S (Walk-ins).

In a situation where the actual shipper utilizes a guest account sign-on (e.g., via the service provider's website) and prints out a shipping label without creating an account, the *Shipper Account Number* may be left blank, but the *Shipper Account Type* must be coded as a Type I (immediate or internet transaction).

See: Table 30: Other Party Information Type Codes in the ACAS IG.

Industry best practices would be to reduce or even eliminate the ability for an actual shipper to ship cargo without creating an account with the logistics provider they tender the cargo to.

13.   Will the Shipper phone number and Shipper e-mail ever be different from the Shipper Account phone number and the Shipper Account e-mail?

Yes. This is especially true for express cargo "walk-in" situations.

14. What is the benefit to providing a Consignee Number (CBP Importer of Record Number) and Authorized Economic Operator Number (CBP Manufacturer Identification Number)?

CBP security programs are all about identifying and mitigating risk. Some supply chain entities have already been vetted and verified as being lower risk. By providing this information prior to loading of the aircraft, CBP may apply tangible facilitation benefits to these shipments.

15. What is a validated e-mail or validated phone number?

Businesses are increasingly moving towards two-factor authentication to protect themselves and their customers from fraud and other cybersecurity crimes. In industry best practices, a contact phone number and e-mail are collected, of which at least one is validated. Validation can also be as simple as the *Shipper Account Issuer* calling the phone number provided and verifying that the actual shipper will answer the phone. It could also be as simple as the *Shipper Account Issuer* seeing the phone number show up on a caller ID function. Similarly, the e-mail addresses can be validated by the exchange of e-mails between the *Shipper Account Issuer* and the actual shipper.

16. Internet Protocol (IP) Address

As an additional security factor, CBP is looking to collect the IP Address (or MAC Address) of the device when the Shipper Account was created. In addition, CBP would like to receive the IP Address (or MAC Address) of the device used to file the Enhanced ACAS Security Filing each time an ACAS Filing is submitted – especially in the case of self-filers.

Industry best practices include the ability of the logistics service provider identifying if a virtual private network (VPN) security feature is being used to mask the creation of a Shipper Account, and to consider limiting the ability of an actual shipper to utilize a VPN when setting up an account. In addition, industry best practices include limiting or restricting the use of a VPN to mask the real IP Address when filing an Enhanced ACAS Security Filing.

SCOPE

17. Is the intent for the Enhanced ACAS Security Filing to become global in nature?

CBP will accept Enhanced ACAS Security Filings globally.

18.   **Can an Air Carrier file an Enhanced ACAS Security Filing on the Master bill of lading?**

Absolutely. The air carrier is encouraged to include the Shipper Account information it has with the freight forwarder. Especially if the freight forwarder is a Regulated Agent.

PRIVACY CONCERNS

19.   **Some of the additional data elements required as part of an Enhanced ACAS Security Filing may inadvertently conflict with or breach national laws pertaining to data protection and privacy, such as the European Union General Data Protection Regulation (GDPR).**

CBP currently collects an assortment of Personally Identifiable Information (PII) for legitimate government reasons in the air passenger environment and is consistent with our other border search authority requirements in the cargo realm.

20.   **When would bio data be collected?**

The collection of bio data makes the most sense in express walk-in types of transactions that are generally considered person to person shipments.

21.   **What are acceptable forms of identification and what information should be verified?**

Government issued identification. Picture ID, Document Type, Document Number, Shipper Name, Shipper Address, Date of Birth of the shipper. Does the document match the shipper name and address on the shipping documents?

CBP is not looking to collect any bio data for normal business to business transactions or business to personal transactions.

TECHNICAL

22.   **Some of the European air cargo data is stored in a format that doesn't allow for the use of the "@" sign. This would make the provision of e-mail addresses difficult to do.**

CBP is exploring the ability to use "(at)" as a replacement for "@".

23.   Will CBP continue to support XML?

While it is not the preferred format being used by industry partners today to file ACAS SF, CBP will continue to support XML as a format with the new Enhanced ACAS SF. Please see Table 27: IATA E-Freight XML (Example) in the ACAS IG for more information.

CONCLUSION

CBP remains committed to working with industry as we continue to develop the Enhanced ACAS SF program. CBP will update this FAQ document as frequently as necessary to provide the latest information on the business process. For technical information, please see the latest ACAS IG posted on the CBP.gov website.