Commercial Customs Operations Advisory Committee (COAC)

Next Generation Facilitation Subcommittee 1USG Working Group

Global Business Identifier (GBI)

December 2019



Global Business Identifier (GBI) Initiative

OBJECTIVE

The GBI Initiative aims to develop a systematic, accurate and efficient method for the U.S. Government (USG) to identify foreign business entities, supply chain roles, Authorized Economic Operator (AEO) program status, and foreign addresses. It will enable the USG to use a "common language" employed by the trade community and better position U.S. Customs and Border Protection (CBP) and partner government agencies (PGA) to target high-risk shipments.

BENEFITS

To Government

- Who is Who: globally unique record of foreign entities
- Ownership and Affiliation: insight into parentsubsidiary structures; common ownership
- Improved data quality and defined supply chain roles for **targeting and risk assessments**
- More robust than the World Customs Organization (WCO) Trader Identification Number (TIN), but adheres to WCO TIN guidelines and allows for usage of the TIN.

To Industry

- Trade-facing portal maintained by third parties with established data governance and entity management procedures to update and correct information
- Globally unique and accessible
- Universal sector coverage
- Use of identifiers that companies already possess
- Facilitation benefits for participation (fewer holds, etc.)
- Allow CTPAT members to **easily verify partners' membership** in participating trusted trader programs.

PROPOSED SOLUTION

- Launch an evaluative proof of concept (EPoC) that will test the **Legal Entity Identifier (LEI)**, a 20-character identifier based on an international standard; the **Global Location Number (GLN)**, a 13-digit identifier that can be customized to indicate supply chain roles, location, functions, etc. for relevant "origin-conferring" entities; and the **Data Universal Numbering System (DUNS)**, a 9-digit randomly generated identifier that records unique business establishments, to determine the **optimal GBI solution**.
- The optimal solution would uniquely identify the main legal entity, its different business locations, their functions and supply chain roles, and ultimately **improve data quality and efficiency** for targeting, enforcement, and risk assessments.
- This EPoC will be through the **USG's Single Window** platform and volunteer participants will be required to submit all three identifiers upon entry.

IDENTIFIER COMPARISON

LEI	20 characters; unique to a legal entity, as determined by the certifying body in that jurisdiction.	Created / managed by Local Originating Units (LOUs) with oversight by the Global LEI Foundation (GLEIF).	Accurate: Data includes registered address/corporate HQ; Date of most recent renewal; How data was verified. Charts parent-sibling relationships. Searchable: GLEIF website allows for key word searching and access to associated data. Disputable: Users can challenge data accuracy. Low Cost: Charge to issue LEI on cost recovery basis only. No cost to USG to access LEI data. Competitive: Open issuance rules allow for competition among LOUs and increases robustness of the system.	318700BHIA15IW21JH33 LOU Identifier Entity Identifier Check WIDGET Export - Import 7582 Industrial Lane 69214 Chodovská radiála CZ
GLN	13 digit number; Customizable to location, function, other logistics. Can be applied to products in form of a RFID-enabled bar code.	Created / managed by GS1, an international not-for -profit organization, through local GS1 Member Organizations (MO).	Strong Management and Oversight: Created and managed by GS1, an international not-for-profit organization and UPC symbol pioneer. GS1 maintains detailed rules for issuance and allocation. Global: A GLN can be assigned by a company anywhere in the world and can be used globally. Flexible: A legal entity can have multiple GLNs to specify location role. Low Cost: No cost to USG to access GLN data. GS1 pricing schedules vary by country. No cost to companies using GS1 standards.	5439156581234 Widget Company Prefix Manufacturing Location for Type A Check Digit 5439156845633 Widget Company Prefix Manufacturing Location for Type B Check Digit
DUNS	9 digit number; randomly generated; identifies unique business establishments	Created / managed by Dun & Bradstreet (D&B), a private company based in the U.S.	Business Location Specific: Every business location is uniquely linked to a DUNS number. Charts family tree relationships. Customizable: DUNS data is licensed based on number of records and type of insight, allowing for tailored subset of identifier information. Prevalent: D&B has data on 300 million business locations globally, with 140 million active business locations. Unknown Cost: Full-implementation costs to USG are unknown.	215 287-1450 WIDGET INTERNATIONAL HOLDINGS LLC 618 Industry Ave Chodovská radiála, CZ 69214 Subsidiary - Active