

**Commercial Customs Operations Advisory
Committee (COAC)
Next Generation Facilitation Subcommittee
1USG Working Group**

December 2019

COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

Recommendations

Short term recommendation (for Evaluative Proof of Concept)

1. In order to more fully realize the benefits of the Global Business Identifier (GBI) initiative, COAC recommends that CBP work with the agencies within the Border Interagency Executive Council (BIEC) to identify and assess any other entity identifiers currently in use and pursue alignment on the use of the GBI exclusively wherever feasible
2. COAC recommends that CBP provide legal entities with access to reporting of their GBI to enable detection of unauthorized use. In addition, importers of record should have visibility to GBI entities associated with their transactions.
3. COAC recommends that Evaluative Proof of Concept (EPoC) participants be able to obtain the needed entity identifier(s) from applicable entity identifier management companies at no or significantly reduced cost.
4. COAC recommends that data utilized under the GBI program be independent of ownership or contract concerns that could result in the elimination or purging of data from systems within the government or trade.
5. COAC recommends that in designing the EPoC, CBP should push for submission of all three identifiers but permit the use of two of the three to help with participant recruitment efforts.
6. COAC recommends that EPoC participants not be penalized for lack of timeliness or completeness of data sets submitted for transactions within the pilot.
7. COAC recommends that BIEC develop a policy that the shipments of CTPAT importers who submit all required GBI data for entities in their supply chains receive fewer inspections from CBP and Partnering Government Agencies (PGAs).
8. COAC recommends that CBP broaden the scope of the EPoC to include Mexico.
9. To allow for reasonable estimation of cost and requirements to participate, CPB should provide that final EPoC requirements relating to data and electronic transmission for pilot participation are identified and communicated as clearly and early as possible.
10. COAC recommends that the currently proposed two phased launch of EPoC be combined into a single phase with cargo release and entry filing under the EPoC to launch concurrently as this would enable transaction processing to occur in one or two steps as needed within the EPoC.

11. COAC recommends that CBP consider expanding the EPoC to include all the data sets required for a transaction from security filing through entry summary.
12. COAC recommends that CBP work with the COAC 1USG Working Group in the design of the Pilot program management (including lifespan of pilot, ramp up period, minimum number of participants, rules for participating in the pilot, options and windows to expand the list of products included under the pilot, etc.)
13. COAC recommends that throughout the pilot, CBP review the entire operational process to ensure that there is no significant negative impact to trade facilitation resulting from this process and data submission change.

Longer term recommendations (Post Evaluative Proof of Concept)

14. In order to more fully realize the benefits of the GBI initiative in an international context, COAC recommends that CBP explore aligning the GBI bi-laterally, regionally and with work underway at the World Customs Organization (WCO) to enable and facilitate broader adoption.
15. COAC recommends that CBP, in light of proprietary concerns, evaluate the degree of information access afforded to private-sector parties other than the importer of record.
16. COAC recommends that CBP explore the effective use of GBI related to screening entities of concern (e.g. Restricted Party Screening, Import Alerts etc.). The exploration should approach both:
 - Pro-active screening by the Government and/or entity identifier management companies as part of the issuance and maintenance process to assist in mitigating the ongoing screening requirements on the trade.
 - Agency utilization of the GBI in publication of entities of concern to enable more effective identification of those parties within the applicable supply chain.
17. COAC recommends that CBP leverage GBI and the accompanying data to reduce redundant data elements currently required at various points of the importation process. The effort to reduce redundant data elements should apply to both CBP-required and PGA-required elements.