In-bond Modernization White Paper

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COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

COAC In-Bond Working Group
In-Bond Modernization White Paper

Summary:
In-bond use has grown with over 46 million discrete in-bond transactions identified in 2018. Despite regulatory and system changes implemented since 2017 to improve the in-bond process, persistent issues still exist in utilization of in-bond movements. Reconciliation of in-bond shipments has been vastly improved due to automation enhancements and enhanced reporting requirements that have created facilitation opportunities for low risk cargo. COAC established a working group under the STL Subcommittee to identify issues, assist with implementation of automation changes and identify both regulatory and technical solutions to assist CBP in creating a better and more equitable in-bond process. As CBP began to look at 21st Century solutions, the working group took on the effort of identifying processes to modernize in-bond for the 21st century. This White Paper represents the outline of that modernization. Issue areas are identified and specific pain points are identified from the trade perspective. Solutions have been recommended, where possible, return on investments in time and cost have been identified. This strategy White Paper is a living working document and as further discussions and evaluations take place – updates will apply where solid recommendations become apparent and will be included within this white paper and made by COAC to CBP for consideration as they are identified
- TOPIC 1: Visibility to In-bond Transactions Across All Trade and CBP Stakeholders
- TOPIC 2: Bonded carrier liability is not always clear between supply chain parties and process issues cause additional liability issues.
- TOPIC 3: Lack of seamless in-bond electronic handoffs among and tracking across all modes of transport and all stakeholders
- TOPIC 4: Automation of in-bonds regulatory requirements were only applied to ocean, rail and truck shipments, not air.
- TOPIC 5: Port Policy and Nationwide Harmonization
- TOPIC 6: Miscellaneous High-Pain Technical Issues (Some of Which are Potentially Low-hanging Fruit in Terms of Short-term Technical Solutions)

TOPIC 1: Visibility to In-bond Transactions across All Trade and CBP Stakeholders
Lack of visibility of the entire trade community to in-bond transactions and statuses has been identified as the most significant area that causes issues with in-bond participants. For CBP, consistent visibility to the location of in-bond shipments and to the party in possession of them, a necessary oversight function, is also lacking. Visibility pain points are particularly associated with moving in-bonds between modes of transportation and supply chain partners. While these issues under this topic have different causes, solutions for this topic are mostly common ones and, while all issues may not be represented specifically, the intent of the solutions is to cover all scenarios for all modes.

Regulatory Solution: Mandate full automation of all facilities that handle in-bonds to allow them to receive real time notification of shipment status to allow expedited handling of released cargo.

Technical Solutions:
- Enable ACE real-time visibility of in-bonds created for "domestic in-bond exports", which will often be created not in a manifest system but in QP/WP, and provide notification to the exporting carrier of that status in a manner that allows the exporting carrier to clearly identify the shipment in question.
- Create account types in ACE that would allow them to connect to CBP to receive real time notifications of status and/or report arrival/disposition of cargo in those facilities.
- Update automation in ACE to notify carrier and update reports "real time" once in-bond is activated, and when any change to the in-bond is made.
- Piece count should be added to the portal truck in-bond record.
- Program ocean house bill release in ACE to allow for House Bill level queries and transaction notifications.

Policy Solution:
- Generate appropriate policies for each issue to ensure that consistent national policies apply that clarify liability and responsibility commensurate with new visibility
- Implement data transmission requirements on the party that is opening the in-bond that clearly identify the exporting carrier and the shipment itself, for example an air waybill number (which the carrier will be able to identify in incoming notification messages and in its own IT system).[1]

A. **In-bond shipment originates as a "domestic" FTZ or bonded warehouse.**
- Pain Point: For these shipments, the transportation document appears to cover a domestic export. The carrier has no notice of the shipment's status except for paper documentation indicating that the shipment is not a domestic-origin export but rather an in-bond in-transit export. This pain point was submitted by conventional air, but likely is applicable to all other modes of transport.
    - Additional Notes: Visibility/notification is an absolute minimum necessity for shipments that have been opened under the exporting carrier's liability, but expanding the visibility/notice for ALL in-bond shipments that the exporting carrier will be transporting would also allow these in-bonds to be closed by that carrier, in line with the preference to allow parties with the most accurate data to provide that data to CBP.
- Cross-reference Topic?: YES – TOPIC 3 (LACK OF SEAMLESSNESS)

B. **Ocean carriers, truckers, importers, and inland FIRMS warehouses want Customs status visible prior to in-bond arrival. New: Visibility that all necessary entries are closed out and correlating in-bond is also closed.**

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[1] Note, a house bill number is insufficient for identification today, but in conjunction with the automated export manifest system that will link the house bill to the master bill, it may become sufficient. This technical in-bond need should be captured in CBP's export manifest work.

- Pain Point: Bonded rail sites (FIRMS locations) should be automated. Arrangement of transportation cannot sometimes be effected if visibility to Release / Hold status is not evident until cargo arrival at IB-Bond location - This created delays and Demurrage costs for cargo that has already been released prior to arrival

C. Broker prepares in-bond, obligating carrier bond with authority from US or CA carriers, afterward limited communications on arrival or export also changes to in-bond. 24HR or more before activation reflects in the in-bond ACE reports.
- Pain Point: Lack of real time visibility causes carriers to depend on reports. Real time notification is required for all parties.

D. Updates from CBP on in-bonds (Holds, reviews) while in-transit or waiting for export.
- Pain Point: Notification to appropriate parties to the in-bond transaction via CBP programming for holds or reviews, include upload for review of documents if required.

E. Issue: Queries of in-bond holds must be done through master bill.
- Pain Point: In-bonds moved at the house level still need to be queried at the master level causing additional work and allowing for less specificity in queries.

F. Issue: No CBP release posted against ocean house bills.
- Pain Point: In ocean, all in-bond postings are performed against the master bill.

G. Issue - Lack of mandatory use of electronic processes for visibility of release.
- Pain Point: There is a lack of automation of CFS and bonded warehouses for in-bond transactions. This causes carriers, brokers and other to default to a paper document.

TOPIC 2: Bonded carrier liability is not always clear between supply chain parties and process issues cause additional liability issues.
There is a lack of clarity in the regulations and policy that defines when liability transfers between trade partners in in-bond scenarios. This negatively impacts all partners both bonded and non-bonded parties contracted as part of the process.

Additionally, the current regulatory structure reflects past and current circumstances, where certain parties dealing with in-bond shipments are not required to be automated, where neither CBP nor trade IT has sufficient functionality to allow all in-bond transactions to take place electronically, and where there is a lack of real-time visibility to in-bond statuses and movement. Topics 1 and 3 address those pain points and suggest solutions. The regulatory regime for liability should be rationalized taking into account these IT and visibility improvements.

Regulatory Solutions:
- Clarify regulations regarding transfer of liability between trade partners. Determine when liability transfers based on real world scenarios and potential automation and policy improvements. For example, if a merchandise handoff is required between parties, regulations could state that the handoff notification from CBP transfers liability.
- Regulations should establish liability requirements that are black and white with regard to which party is liable, minimizing the gray zone of "joint liability", and better delineating the exact division of liability when necessary gray areas of shared liability remain.
- Parties that open an in-bond utilizing another party's bond liability should retain responsibility for the tracking of the in-bond, notification of in-bond status to other parties (similar to requirements for USPPI's to provide AES citations to transportation providers) and ensuring that the in-bond is closed in a timely manner.
- Regulations should establish clear timeframes for handoffs.
- Additional clarity is also required to clearly define permitted and prohibited manipulation of goods under in-bond movement.

Technical Solution:
- Automation of CFS, FTZ, in-bond bonded depots, and facilities.
- Allow for transfer of liabilities messaging from CBPs within respective facilities required reporting time limitations.
- ACE automation – seamless real-time electronic in-bond transfers across modal manifest and other systems (i.e., such as broker systems), including "handshakes" between parties (messages from the first party that the in-bond shipment has been transferred, and from the second party that the in-bond shipment has been received),.
- Piece count should be added to the portal truck in-bond record.
- Establish automated notifications and permits to manipulate.
- ACE Automation – Improved ACE controls over in-bond use; Real time message to bonded parties when bond obligation occurs.

Policy Solutions:
- Mandate the time limit to file CBPF 214, etc., from arrival of cargo at FTZ to limit liability and close carrier bond.
- Establish policy to support automation and regulatory requirements for all in-bond movements to provide additional scenario driven clarity on in-bond liability transfers.
- Require that the party taking possession of an in-bond shipment provide an acceptance notification to ACE – i.e., a required "handshake" to pass liability between the two bonded parties.
- Establish clear-cut policy on allowable manipulation, and on conditions under which it is allowed (permit to manipulate) and when prohibited.
- Require that parties opening an in-bond under an export carrier's liability provide a sufficient amount of shipment data in the in-bond application to allow the shipment to be linked in ACE to the export carrier and to the transportation bill, therefore facilitating notice to the obligated party so that it can fulfill its in-bond obligations.

- CBP and Trade joint development and promotion of "in-bond best practices" to the supply chain.

A. **Admission of merchandise to an FTZ within the regulatory time allowed.[2]**
   - Pain Point**:** 30-day maximum transit time to transport and close in-bond requires the transfer of liability from the bonded carrier to the FTZ. Customs requires admission of merchandise to an FTZ within the regulatory time allowed. With the admission to the FTZ should be the close of the in-bond calendar and transfer of liability. Ocean carriers who deliver containers to an FTZ should not be required to ensure the FTZ files the CBPF 214, applies for temporary deposit, or files other Customs documents in a timely manner.

B. **Transfer of Bond liability in Rail Mode when interchanging shipment between rail carriers**
   - Pain Point: Rail carriers have ability to electronically pass bond information between interchanging railroads on EDI interline waybills.

C. **Transfer of liability from importing carrier to border carrier, definition of manipulate should be clearly identified.**
   - Pain Point: Allow for review of in-bond merchandise for foreign export and clarify termination of Manipulation.

D. **Transferring cargo from bonded carrier to bonded facility or second bonded carrier currently has no electronic except or concurrence process**
   - Pain Point: Replicate e-214 process to notify to CBP the acceptance and concurrence of in-bond cargo that is delivered to a bonded warehouse or to another bonded carrier. This notification should represent acceptance of in-bond liability by the receiving party, and should also therefore serve as a transfer of liability from the transferring party to the receiving party, similar to FTZ concurrence.
   - Cross-reference Topic: Yes, similar to topics 3A, 3E and 4B.

E. **Issue: In-bond opened by a party other than the transporting carrier**

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[2] Currently, for Zones under Direct Delivery, the Regulations allow the Zone Operator to "Arrive" the cargo at the Zone indicating physical receipt. The arrival function is an acknowledgement that the conveyance/load has arrived, but it has not been counted, placed into the ICRS, "admitted" and Concurred. The Regulations provide up to 15 days after Arrival for Admission/Concurrence. Arrival at the Zone sets up the shared liability that you have spoken often about but it cannot close the in-bond entirely as the cargo has not been counted and there may need to be a Discrepancy Report filing and the Bill of Lading/AWB cannot be closed until all underlying bills on the in-bond are accounted for. Since the zone can only arrive what it has physically received, the full liability of the carrier should not be discharged until the concurrence occurs.

- Pain Point: There two key pain points associated to situations where a party opens an in-bond placing liability not on itself, but on another party. First, ACE does not yet provide sufficiently-nuanced control of in-bond use to allow a carrier to ensure that those using its bonds have a POA to do so (current functionality is overly-cumbersome and not operationally feasible for high-volume carriers), nor does it provide sufficient notice of the existence of the in-bond liability to the carrier in reports (as sufficient data may not be present to allow the identification of the shipment), nor does it provide real-time notice of the in-bond creation to the party whose bond is obligated. Second, the current system sets up a non-ideal allocation of in-bond liability, as the party generating the shipment and opening the in-bond escapes all responsibility for in-bond tracking and closure.
- Cross-reference Topic: YES: TOPIC 1 (Visibility)

TOPIC 3: Lack of seamless in-bond electronic handoffs among and tracking across all modes of transport and all stakeholders

In-bond cargo moves on all modes of transport and often transfers between modes. Current automation supports separate mode functionality only, and does not provide carriers the ability to electronically transfer merchandise between modes. This is especially troublesome for air movements transferred to or from another mode (due to the different treatment of air – see Topic 4 below), which often requires reversion to paper due to different identifiers for transactions, ports etc. Of special concern are "flying truck" movements, where air waybills are moved into the U.S. via truck for further air movement and clearance, or are exported by truck to Canada or Mexico.

Regulatory Solution:
- Combine and standardize all in-bond regulations into a single chapter.
- Evaluate additional multi-modal standardization of local bonded moves as well to ensure that the entire process is facilitated.
- Complete the regulatory requirements to establish electronic export manifesting for all modes.
- Require all parties handling in-bond freight to be automated for visibility to real-time cargo status messages. This includes such entities as bonded warehouses, CFSs, and G.O. warehouses.
- Evaluate if any regulatory changes are needed for "flying trucks".

Technical Solution:
- Create translation tables between modes to facilitate the different modes.
- Allow for all bill of lading types to be used between modes of transport for in-bond cargo.
- Standardize edits across all modes (arrival and all other mandated notifications).
- Enhance EEM to ensure full in-bond closure upon departure of export manifest.

- Multimodal in-bond process for flying trucks that allows seamless express and conventional air processing throughout the transaction.[3]
- Allow the use of both airport and 4-digit port codes in air manifest.

Policy Solutions:
- Require all parties handling in-bond freight to be automated for visibility to real-time cargo status messages. This includes such entities as bonded warehouses, CFSs, and G.O. warehouses.
- Create standard national policy and guidance to ensure that multi-modality is supported via electronic processes.
- Accelerate deployment of Electronic Export Manifest (EEM) to support in-bond closure via EEM filing and departure.

A. For movement between modes, ACE automated intermodal transfer capability does not exist, in-bond reverts to paper and must be "re-automated" at the end of the process.
- Pain Point: ACE currently provides no mechanism for in-bond information to pass between modal systems such that bonds are truly electronic. Instead, when an intermodal transfer takes place, the bond must revert to paper and then be "re-automated" at the end of the process, a significant burden on the supply chain.
- Cross-reference Topic: 2D

B. Disconnect between Air Manifest & QP/WP
- Pain Point: Ability for ECOs to manage efficiently FTZ/Bonded warehouse originating in-bond and PGA refusals.

C. Despite electronic in-bond requirements, the trade is still forced to use paper documentation because not all parties handling in-bond cargo are automated.
- Pain Point: Although an in-bond may be electronic, paper CBPF 7512 or equivalent paper documentation must still be produced by the trade to secure release at non-automated CFS warehouses and other locations. Warehouse release processes should be automated.
- Cross-reference Topic: Topics 1 and 2

D. In-bound and out-bound flying trucks
- Pain Point: It is difficult for carriers to manage shipments that are moving under an AWB when those shipments are crossing the border by truck.
  - Additional Notes: Desired end-state is the allowance of mixed reporting of AWBs on trucks, with AWBs reported by the air carrier, and truck-specific elements report by the truck carrier. For exports, allow use of truck port codes in air manifest.

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[3] Short term fix could be provided by CBP providing capability for truck carriers to pull AWBs from air carriers into their truck manifest declaration without having to re-key the data

E. Issue: In-bond shipment moves to a non-automated party, especially GO warehouses.

- Pain Point: In-bonds going to General Order warehouses are not closed electronically by the movement to G.O. Although CBP has developed G.O. messaging within at least one manifest system (air), this messaging cannot be implemented because CBP has not required G.O. warehouses to automate. Automated transfer messages should be implemented, with the G.O.s required to electronically indicate acceptance, which should close out a carrier's in-bond movement and liability.
- Cross-reference Topic: YES – TOPIC 1 (Visibility)

TOPIC 4: Regulatory requirements for automation of in-bond were applied only to ocean, rail and truck shipments, not air. .

Regulatory Solution: Rewrite Part 18 and 122 to have a single source for all in-bond regulatory requirements and create the regulatory basis for a fully multi-modal environment.

Technical Solution: Data element alignment needs to be developed, specifically to link air in-bonds to ports of entry rather than airport codes. Additional work will also be required to ensure reporting visibility to all trade partners (specific pain point and solution below).

Policy Solutions: Develop policy and guidance to implement and support regulatory guidance.

A. Air in-bond regulations are contained in Part 122, while all other modes are covered by the "basic" in-bond regulations in Part 18. (CBP identified issue in workgroup charter).

- Pain Point: The different treatment of air versus all other modes of transport causes confusion for all stakeholders. Additionally, the separation of air from all other modes has today resulted in a number of in-bond shipments being exempted from automated closure requirements.

B. In-bond shipment moves from arrival air carrier to another air carrier.

- Pain Point: Although ACE functionality already allows the electronic transfer of an in-bond authorization from the arrival carrier to the next air carrier, which also provides CBP of notice of the party in possession of the shipment, CBP has never made use of this functionality mandatory. Further, even when the functionality is used, there remains an unclear distribution of liability between the transferring carrier and the receiving carrier. This causes unnecessary confusion and extra work when there is a problem with an in-bond shipment no longer in possession of the arrival carrier, but rather already in the hands of the second carrier.
- Cross-reference Topic: Topic 1 – visibility to in-bond movement; Topic 2 proper allocation of in-bond liability

TOPIC 5: Port Policy and Nationwide Harmonization
CBP needs to ensure that national guidance, once developed is implemented in a uniform manner nationally. There are often seen to be port-by-port rules that force either manual processing or create additional liquidated damage and penalty claims due to port specific non-compliance.

Regulatory Solutions:
- Review all regulations with an eye towards clarity and enforceability to ensure uniform enforcement on a national basis.
- Review the port-director centered nature of certain regulations. In the case of centralized national systems such as manifest and in-bond, make national harmonization the default, not port-level variation unless such variation is required by circumstances.
- Remove outdated or contradictory requirements including labeling and shipment level sealing.
- Review regulations requiring bonded carriers to physically take possession of cargo in order to obligate bond for use of subcontractor or other agent.
- Regulations should recognize business relationships and allow for acceptance of liability based on that relationship.
- Look to create more CBP focused regulations for in-bond that limit the discretion at the port level.
- Provide regulatory provisions distinguishing the difference between Manipulation as reflected in 19CFR § 19.11 Manipulation and include Review of merchandise for pieces count, quantity, and serial numbers if required in 19CFR § 18 with CBP approval

Technical Solution: None identified, beyond expanded technical training to ports.

Policy Solutions:
- Develop national level policy to meet all port needs and provide appropriate guidance and training.
- Publish a definition for review of Inbond merchandise with clear guideline's reflecting under the Automated In-Bond Processing Business Process Document Public Version 2.1 Appendix Manipulation Rules

A. Port policy divides the uniformity with in-bond HQ guidelines.
  - Pain Point: HQ guidelines for in-bond procedures should be uniform for CBP ports.

B. Port practices – IBEC with in-bonds in Miami.
  - Pain Point: Bring local port practices into current practice for in-bond and export manifest.

C. Issue: Business relationship between customs brokers & carriers (clarity with port on HQ guidelines)
  - Pain point - Trade Sector business agreement on CBP port practices with HQ updated guidelines for in-bond to align port practices and ensure understanding of CBP Officers.

D. Issue: Broker prepares in-bond, obligating carrier bond with authority from US or CA carriers, afterward limited communications on arrival or export also changes to in-bond. 24HR or more before activation reflects in the in-bond ACE reports.

- Pain Point: Broker has limited visibility to bonds they file on behalf of other parties. This leads to extra work to determine status, issues with trade partners and liquidated damage assessments due to misunderstanding.
- Cross-reference Topic: Topic 1

E. Issue: Transfer of liability from importing carrier to border carrier, definition of manipulate should be clearly identified.

- Pain Point: Allow for review of in-bond merchandise for foreign export and clarify termination of Manipulation.

TOPIC 6: Miscellaneous High-Pain Technical Issues (Some of Which are Potentially Low-hanging Fruit in Terms of Short-term Technical Solutions)

There are technical and policy issues that add cost and resources that could potentially be resolved in the short term without significant, or perhaps any, regulatory changes. Among these are timing of notifications in ACE, conveyance arrival capability in air manifest, piece-level in-bond arrival capability, FIRMS code improvements, and several others.

Regulatory Solutions: Amend Part 146 to better reflect current processes for transfers of cargo within a port where the originating bill is already closed. Current regulations require an IT but that conflicts with in-bond rules requiring two ports for an IT move.

Technical Solutions:
- Enable ability of ACE to arrive goods in portions including piece count, container and house bill level arrival.
- Allow ACE to send any notifications prior to arrival at destination but after initial arrival of conveyance at first port. This would include in-bond destination holds and subsequent in-bond approvals.
- ACE should allow carrier to arrive conveyance from foreign in all modes (air has been problematic).
- An automated FIRMS code issuance process should be developed.
- The in-bond clock (30 day), the G.O. clock (15 day) and the entry summary clock (10 day) should all stop if the goods are placed under a CBP hold and resume when the hold is removed.
- Rail carriers should have split shipment functionality for multi container ocean shipments that arrive in Canada or Mexico and that are re-billed for arrival by rail in the U.S. These shipments would require a single bill with split arrival at the container level to allow for single consolidated entry at destination.
- Add Active FIRMS code list drop down to ACE In-Bond Truck or at least a real time query in other modes.
- In air, the ability for an express carrier house bill filer to also file in-bond/local transfers for a MAWB transmitted by a conventional carrier when the express carrier has been nominated as the agent in the MAWB air manifest record.
- Create new single ACR/H01/ZCR that would allow carriers to submit at CTR or BL level indicating total "N" time of delay.

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- Customs to send an acknowledgement along with total new updated time remaining in the 30 day clock, which will now include the update from carriers.
- Allow IB to be amended/updated. Currently, if IB needs to be changed, it has to be deleted and then resubmitted.
- Add capability to move bonded freight (FTZ and bonded warehouse moves) no longer traveling on the original bill of lading, within same port on PTT created outside of manifest or e214 (currently QP/WP).

Policy Solutions:
- Evaluate and issue appropriate guidance based on solution of these issues.
- Scenarios are needed for issues like T&E in-bonds returned for export after rejection at destination.
- In-bonds that begin travel to destination but are rejected prior to arrival and return to the originating port should arrive the in-bond at the port of rejection (or intermediate port) and issue a new in-bond to export but that is not clearly spelled out.
- User Guides/Web videos for ACE Reports/in-bond authorization per mode.

A. Transit from In-bond Origin to Destination in Tranches
- Pain Point: For shipments that move from the in-bond origin to in-bond destination in tranches, there is a mismatch between Air Manifest in-bond arrival functionality (full arrival only)and the 2-business day arrival requirement as interpreted by CBP (arrival report mandatory (w/in2 business days of arrival of first piece

B. CBP fails to arrive manifest; no trade visibility to failure until downstream problem with subsequent in-bond
- Pain Point: Air manifest filers are dependent for all downstream process on a CBP Officer arriving the conveyance in ACE. This causes a failure of downstream processes as notifications are suppressed until arrival is completed. This causes extra work for both CBP and carriers as well as downstream brokers and forwarders.

C. Air Manifest naming conventions/functionality
- Pain Point: Missing port codes/diversion/destination. Air is built around airport codes and not port codes which drive the rest of the system. The ability to add a port or have it translated in the system would significantly align air to the other modes.
- Cross-reference Topic: Topic 3

D. Ability to create a T&E that exits through the first port of arrival in the case of a return or misrouted shipment (example Caribbean AWB enters San Juan, PR in-bonds to a hub, doesn't clear, in-bond back to San Juan to go back to the Caribbean).
- Pain Point: Shipments moving under a T&E that are returned back to originating port cannot be arrived or closed due to system edits.

E. FIRMS code administration is handled manually and differently at each port
- Pain Point: Ability for carriers to create and maintain FIRMS codes in ACE. A FIRMS code module should be created in ACE to handle this automation and other FIRMS related functionalities**.**

F. 30-day clock for IB does not "stop" when cargo is under Customs hold.
- Pain Point: When cargo is under CBP or PGA regulatory hold, the in-bond clock should stop until the trade has the ability to move cargo once a release is issued at the port of destination

G. Merchandise Processing Fee multiplies when in-bond ocean freight enters the U.S. at a border port by rail.
- Pain Point: ACE does not recognize a single multi-container shipment from a vessel that is split onto multiple trains, which generates much higher costs to the U.S. Importer. This is a CBP policy and system issue. When importers/brokers clear a single in-bond shipment from a vessel calling on a Canadian port, made up of multiple containers crossing the border on different trains, they should be able to file a single entry

H. Issue: CBP external outreach per Mode.
- Pain Point: CBP outreach is limited to processing documentation. We would like additional focused outreach including enhance user guides and videos.

I. Ability to file in-bond/local transfer for a MAWB, I did not put on file when I am nominated as the agent via air manifest.
- Pain Point: Cannot file as above.

J. Issue: Active FIRMS code list not available in ACE.
- Pain Point: FIRMS codes are currently only available as a text file that is only updated every 2 weeks. This does not facilitate the use of active FIRMS codes and rejects are the only way filers are made aware of the issue.

K. Congestion at Rail Ramps at origin impacting move to in-bond location.
- Pain Point: Have ability to stop clock based on delays at ramp, and have notice generated to CBP through ACE to allow clock extension until cargo physically moves

L. ACE Portal does not allow controls on Bond Authorization for "bonded moves" within the same port.
- Pain Point: The trade is currently conducting work-around to circumvent controls. Please see truck scenario submission called "Zone to Zone Transfer scenario cell 9F regulations say Zone-to-Zone within Port/different Operator must be an I.T. = Can't do I.T. in systems within same port – currently using workaround. ACE requires a PTT for this move and conflict must be resolved.

M. **ACE does not allow in-bonds to be directly amended and updated but instead require a delete and re-add.**
      a. Pain point: This causes problems for all parties including CBP when the in-bond is not added or the bond stays in deleted status.