

U.S. CUSTOMS AND BORDER PROTECTIONS
(CBP)

COMMERCIAL CUSTOMS OPERATIONS ADVISORY COMMITTEE
(COAC)

QUARTERLY PUBLIC MEETING

Wednesday, September 14th, 2022

1:00 P.M. to 3:17 P.M. (CST)

Chicago, Illinois

By: Chelse Sander

OPENING REMARKS

Felicia Pullam, Executive Director for the Office of Trade Relations, opened the meeting and welcomed COAC Members and all the public attendees. The roll was called, and all members except Travis Skinner and Michael Slonim were present.

CBP Deputy Commissioner Troy Miller welcomed and thanked all those participating. He is in attendance on behalf of Customs and Border Protection as Commissioner Chris Magnus is in Mexico for the High-Level Economic Dialogue. The Commissioner is there to discuss several key areas of collaboration with Mexico, including Unified Cargo Processing, the alignment of the U.S. and Mexican Authorized Economic Operator Program, and the modernization of the new and existing border infrastructure through new technologies and strategies.

Deputy Commissioner Miller then provided some Trade updates. First, the 19 CFR 111 Broker Modernization was briefly discussed. It was explained that they are still waiting on the final rule, which is set to be published in the immediate future. Once published, they will be hosting multiple webinars to provide up-to-date details and information regarding the rule.

Progress on the 21st Century Customs Framework legislative package is being made with an emphasis on stakeholder input. Since the start of the 16th COAC term, there have been numerous working sessions with the 21-CCF Task Force members regarding legislative discussion drafts, Trade facilitation, and other industry benefits that should be codified. The Task Force will present additional recommendations during this meeting.

CBP continues to employ a dynamic risk-based approach to enforcement that prioritizes action against the highest risk based on current data and intelligence to prevent prohibited goods from entering the United States. Twelve recommendations focused on UFLPA were presented at the previous public meeting, which CBP and COAC have jointly reviewed, and they are now under full consideration.

Lastly, CBP has modified the Withhold Release Order against the Indian company Natchi Apparel Limited and is allowing the company to resume importation into the United States. This took place roughly one month after CBP issued the WRO at the end of July 2022 and is an example of the swift collaboration between civil society, Natchi, and CBP. As a result, Natchi addressed all six indicators of forced labor identifications within the WRO. This outcome is the ideal whenever a WRO is issued, that forced labor is immediately remediated within a supply chain.

In conclusion, Deputy Commissioner Miller announced that the next Quarterly Public COAC Meeting would be held on December 7th in Washington, D.C. He thanked all the members for their continued participation and introduced the next speaker.

Tax, Trade, and Tariff Policy Deputy Assistant Secretary Tom West stressed the importance of the forward-looking work of the COAC in helping CBP keep up with the changing Trade environment and community. Through this dialogue, they can leverage new technologies and approaches which address many complex supply chain issues.

Under the Next Generation Facilitation subcommittee, specifically the 21-CCF, COAC strives to reach a consensus on the proposals within the Task Force's paper. Through constructive dialogue, they provide critical feedback on their concerns and disagreements with CBP in hopes of reaching a mutual agreement whenever possible

Deputy Assistant Secretary West briefly added that the Rapid Response subcommittee and Broker Modernization Working Group are in their final review of the Broker Modernization and Fee Regulation package. Furthermore, the importance of CBP pilots is stressed as these pilots can provide real-time data on statutory and regulatory reform. He thanks everyone for their continued work and looks forward to their continued input.

Assistant Secretary for Trade and Economic Security Bridget McGovern briefly expressed appreciation to COAC for their formal recommendations relating to ACE 2.0, eCommerce, and export modernization as they relate directly to essential aspects within the Trade environment. She then discussed the continued effort to eradicate forced labor within supply chains and the implementation of the Uyghur Forced Labor Prevention Act.

It was noted that at the previous COAC meeting, DHS and the Interagency Forced Labor Enforcement Task Force had just published the Uyghur Forced Labor Prevention Act strategy, a launching point to galvanize public and private activities to combat this injustice. In addition, at the previous meeting, the Forced Labor Working Group submitted several recommendations, thanking the Working Group and all of COAC for its invaluable input.

Cardell Morant, Assistant Director of the Center for Countering Human Trafficking, explained that HSI is responsible for combatting transnational criminal organizations that exploit the global infrastructure within the Trade, Travel, and Finance realms. In addition, HSI continues to lead the effort of investigating and preventing intellectual property rights violations, digital piracy, illicit trade, and customs fraud through the HSI lead Intellectual Property Rights Center and our field investigative groups.

HSI also focuses on fighting human trafficking globally. With over two hundred and fifty domestic and eighty-five international offices, HIS can work with law enforcement partners, private organizations, and private industry across the globe to generate and gather tips on human trafficking and relay them to its agents. HSI is also uniquely suited to administer the DHS Center for Countering Human Trafficking (CCHT).

Established in October 2020, the CCHT is a cross-department coordination center for countering sex trafficking and forced labor comprised of sixteen supporting components and offices. These efforts include criminal investigations, improvement of victim protection, as well as outreach and training. Through integration and coordination across the many partnerships, the CCHT can enhance each aspect of DHS's work in countering human trafficking.

The Trade sector has a unique awareness of what constitutes as suspicious behavior within complex supply chains, the knowledge of where these crimes are taking place, and their ability to connect with victims to gather preliminary information, which often forms a basis for criminal investigation. \ By sharing information, HSI can focus investigative efforts on manufacturers, importers, and criminal organizations that benefit from forced labor.

COAC Trade Co-Chair Kathy Wilkins gave appreciation to the level of participation and the resources provided to COAC. It was noted that they are anxiously awaiting the release of the Forced Labor Notice of Proposed Rulemaking. Also, a brief comment on the Trade Summit was made.

COAC Trade Co-Chair Brian White summarized that the COAC met the two days prior to the Public Meeting to deliberate, review, and prepare their remarks for this meeting. They also had the opportunity to meet with local port officials. In addition, all members received an overview of the passenger processing and renovation projects at O'Hare International Airport and witnessed some of the Agency's challenges in the international mail facility. On behalf of the members of COAC, they thank CBP for their continued service and dedication to supporting their broad mission and the many daily challenges. COAC is grateful for the opportunity to support CBP in its mission as it relates to providing advice and guidance on Trade commercial practices

INTELLIGENT ENFORCEMENT SUBCOMMITTEE

COAC Co-Lead Erika Vidal-Faulkenberry provided a brief overview of the Subcommittee, which includes the four groups: Anti-Dumping and Countervailing Duty, Bonds, Intellectual Property Rights Process Modernization, and Forced Labor. Although none of the working groups have recommendations to present at this meeting, they look forward to presenting some at the December Public Meeting.

BOND WORKING GROUP

Subcommittee Co-Lead and Working Group Chair Matthew Zehner comments that the group continues to meet monthly, missing only the July meeting due to activities surrounding the Customs Symposium. Since the last meeting, the Commerce Department has provided an update on recent regulatory changes affecting some procedures and processes concerning how commerce handles dumping matters.

Outside the working group, Customs took a step toward helping Trade to understand some of the dumping information by completing an update to the AD/CVD information in the ACE portal. As a result, companion cases are better connected and reestablished, meaning there is a higher chance of seeing the various companion countervailing and anti-dumping cases associated with them.

The Bond Working Group has started looking at the impact of eBonds Status Messaging; the new platform Customs will be using to communicate information to sureties and second-notified parties on bonds. It allows events in the entry not only from the cargo release through liquidation that even involve all protest decisions but how that Bond Status Messaging will relate to entries that may not be connected to an eBond.

ANTI-DUMPING & COUNTERVAILING DUTY (AD/CVD) WORKING GROUP

Co-Chair Matthew Zehner expressed that one of the significant issues that have carried is the issue relating to risk-based bonding. As a reminder, they've introduced the policy of using the SAM list, which identifies those who must do single transaction bonds as they can no longer utilize continuous bonds. Clarification was also added, instructing that the importer may be outside this definition.

Customs has become fully automated. Reviews of the continuance bonds' efficiency are being conducted on a monthly basis. They are designed to help protect revenue from the large number of importers and import transactions that use continuous bonds. Additionally, Customs is training staff on bond issues and field staff on how eBonds are submitted, processing paper bonds, reviewing TIB entries, bond exposure, and handling informal entries.

INTELLECTUAL PROPERTY RIGHTS (IPR) PROCESS MODERNIZATION
WORKING GROUP

COAC Co-Lead Heather Litman explained the group is looking at the operations of the detention and seizure process from past recommendations, which focuses on communication. They've asked how they can improve tracking seized goods through the process, at what point Trade rights holders are notified, and the methods of communicating what happens to those goods.

The Office of the Inspector General report discussed the need to enhance the Trade facility regarding those statistics. By working with Customs, they are looking at how that process can be improved, what parts are paper-based, and what parts are automated. In addition, Customs was looking at what systems are involved.

FORCED LABOR WORKING GROUP

Co-Lead Julie Pojar restated the tremendous effort put in by the group members in putting forth twelve recommendations focusing mainly on the consistency in communication, outreach, and training for CBP, as well as looking for bi-directional training and communication. This was done while attempting to clarify the Trade's position on the Uyghur Forced Labor Prevention Act.

The Forced Labor Working Group met three times this quarter as a working group, and then COAC and CBP leadership teams met once to discuss further strategy. They have focused on diving deeper into the twelve recommendations presented in the second quarter with CBP. However, an action that will carry over into the fourth quarter meeting with the regulations and ruling team to clarify the ruling process concerning one of those recommendations.

A priority for the working group is to continue engaging with CBP on the implementation process of the Uyghur Act. Including communication that concerns Trade, such as fact sheets. Fact sheets will likely be the easiest and quickest vehicle for that type of communication.

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Eric Choy, the Acting Executive Director of Trade Remedy Law Enforcement and CBP Lead, explained that overall, the Intelligent Enforcement Subcommittee has continued to look for opportunities to enhance Trade and government processes, policies, and programs.

The AD/CVD Working Group continues to improve to better facilitate imports of complied importers in ways for those importers to achieve high compliance and enhance accuracy with AD/CVD entry filing.

The Bond Working Group continues to implement recommendations from previous COAC sessions. In addition, they are continuing work on the clearance for the Notice of Proposed Rulemaking to incorporate eBond into 19 CFR 113 Regulations. The rule will update the eBond functionality in automated commercial environments from a test to a requirement that eliminates the majority of paper bond processing. The rule will also ensure that bonds on file are in completion of a thirteen-part bond educational webinar series for CBP personnel.

The Forced Labor Working Group met to focus on providing further clarification in response to COAC recommendations from the July meeting. Additionally, they have discussed updating their statement of work and revising the ongoing priorities for the Agency.

The Intellectual Property Rights Process Modernization Working Group has continued to develop ideas for enhancing CBP operational practices, policies, and programs waiting for CBP's interdiction of violative and counterfeit goods. While drafting their forthcoming December recommendations, they want to ensure that they consider the suggestions reflected in the Office of the Inspector General's report entitled DHS and CBP Should Improve Intellectual Property Rights Management and Enforcement.

PUBLIC COMMENT

Office of Trade Relations Deputy Executive Director Valerie Neuhart opened the floor for public comment.

No comments were heard from online participants or those who attended in person.

NEXT GENERATION FACILITATION SUBCOMMITTEE

COAC Co-Lead Tom Gould explained that the Subcommittee comprises five working groups: the One United States Government Working Group, the 21st Century Customs Framework Task Force, the Automated Commercial Environment 2.0 Working Group, the eCommerce Task Force, and the Emerging Technologies Working Group, which is currently inactive.

ONE UNITED STATES GOVERNMENT (1-USG) WORKING GROUP

Working Group Co-Chair Craig Sellig explained that the group had met five times over the last quarter, including meetings with CBP on the Global Business Identifier Pilot Program. The Working Group does not have any recommendations to present at this time.

21ST CENTURY CUSTOMS FRAMEWORK (21-CCF) TASK FORCE

Working Group Chair Brian White summarized that the 21-CCF Task Force provided a report that included an executive summary, timeline of activities, COAC's position, and the status of each CBP challenge area. Trade facilitation and modernization opportunities were categorized into two groups: on the statutory and procedural or regulatory levels.

Over the last quarter, the group met with CBP leadership to discuss remaining CBP challenge areas. Also, they had single-issue calls for the task force and COAC-specific working group members to discuss concerns on the export penalty statute for 1595a(a), (d), and (e).

Before presenting the recommendations, Mr. White added a call to action for the Trade community to think about statutory-level facilitation opportunities they would like to see and what concepts Trade wants to see advance with CBP to maintain the balance between enforcement and facilitation opportunities. We wish to solicit these concepts related to modernization opportunities.

The first recommendation from the 21st Century Customs Framework Working Group and COAC is for CBP to increase transparency for the Trade for Customs Mutual Assistance Agreements (CMAAs), and CBP must ensure the text of each is linked to the CBP website.

The second recommendation from COAC is that CBP proceeds to internally finalize the draft statutory language based on areas addressed in the course of 21-CCF discussions.

The third recommendation from COAC is that CBP, the 21-CCF Focus Group, and any additional PGAs, as appropriate, continue to discuss and attempt to finalize the below statutory changes proposed by CBP and separately by industry.

AUTOMATED COMMERCIAL ENVIRONMENT (ACE) 2.0 WORKING GROUP

Working Group Co-Lead Jody Swentik explained the group had met three times since the last COAC meeting. The meetings included demonstrations of potential technology solutions that have been either in pilot or under consideration for advancement to the ACE 2.0 project; however, it is not a formal project currently.

Their challenge is to implement the idea behind the ACE 2.0 program with what a new system for the government should look like. To meet the challenge, they've surveyed different areas to consider various supply chains, commodities, and those commodities within supply chains. They discovered more similarities across other industries regarding the workload than differences. For example, a seed from soil to cotton to jeans to shelf is a similar workflow for unrelated sectors.

What is being considered is if there is enough information and the necessary information for partner agencies and Customs to be in a position to make upfront decisions, to decide if they should stop and inspect something or if it can flow through the supply chain. The traceability and visibility of a product, a seed from soil to shelf, as well as its carbon footprint, could increase the visibility of forced labor within a supply chain and its impacts.

The Work Group recommends that CBP continues to pursue further assessment and analysis of modern technologies and innovative tools to improve management and reporting of global supply chain data and efficient cargo release.

COAC's second recommendation is for CBP to promote and encourage Partner Government Agencies (PGA) to sync and modernize processes and infrastructure to allow expanded adoption of the single window.

ECommerce Task Force

Task Force Co-Chair Amy Smith summarized the group's recent activities as they continue to work with Customs to examine the growing ecosystem for eCommerce shipments and how to best target illicit and dangerous shipments while facilitating the flow of legitimate eCommerce.

They have focused on additional data requested by Customs for specific shipments, including possible HTS filings and data elements for Section 321 eCommerce transactions. Specifically, Customs tasked this group with providing the Agency guidance on the waiver process that will be established for filing in HTS, if required having provided initial advice on how the waiver should be constructed and implemented for the Section 321 filers could meet the proposed waiver requirements. They will continue examining new data elements and if they should be subject to a waiver with substantial compliance in eligibility requirements.

The eCommerce Task Force recommends that CBP share with the E-commerce Task Force the initial HTSUS waiver proposal draft, compliance process, and/or additional data waiver prior to its finalization and prior to any notice or release to the public.

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Trade Policy and Programs Deputy Executive Director Robert Kossowsky thanked all the members of the Subcommittee for their continued hard work and leadership as they continue to identify ways to enhance trade, as well as government processes, policies, and programs to better position Trade and CBP for the future.

The 1-USG Working Group continues to be a key conduit for the Trade community to engage partner government agencies to discuss operational and technical policies and regulatory issues of interest. They have held meetings spotlighting guest speakers from the 21-CCF initiative, the Consumer Product Safety Commission, and the National Oceanic and Atmospheric Administration, with upcoming seminars scheduled with the Food and Drug Administration, the Census Bureau, and the Department of Commerce. These presentations have encouraged open dialogue between Trade, CBP, and PGAs.

The cornerstone of the 21st Century Customs Framework Task Force is updating CBP's statutory authorities. Accordingly, CBP has prepared legislative discussion drafts structured around what the Agency views as the biggest impediments to trade modernization. Five working sessions have been dedicated to 21-CCF discussion drafts and industry ideas concerning trade facilitation and other modernization priorities. CBP has also met with an industry-led focus group for a series of five workshops. Held between May and June, the workshops analyzed the 21-CCF discussion drafts and detail, explored potential changes that would address the Task Force's feedback, and identified any remaining concerns or edits to form the future.

The ACE 2.0 Working Group continues to build on the COAC's Reimagined Entry Working Group vision enabled by the legislative framework from the 21-CCF. In addition, the group recently completed an operational analysis to build a vision of the 21st Century supply chain and a capability gap analysis that outlined the overlaps and differences between ACE and ACE 2.0. They are currently organizing internal working groups to evaluate these processes from a government perspective; engaging with industry stakeholders and trade experts continues to be key as ACE 2.0 develops further.

The eCommerce Task Force has been working on minimizing the overwhelming volume of small packages and the lack of actionable data that continues to limit CBP's ability to identify and prevent high-risk shipments. CBP assesses this risk in part using the Harmonized Tariff Schedule or HTS. As a result, the Task Force is currently discussing the development of alternatives to HTS and de minimis shipments.

Concluding, Deputy Executive Director Kossowsky stressed the importance of engaging with the Next Generation Facilitation Subcommittee as a critical asset in defining the future of Trade. He thanked CBP for all their efforts and each member of the working groups, task force, and the Subcommittee as a whole.

PUBLIC COMMENT

Office of Trade Relations Deputy Executive Director Valerie Neuhart opened the floor for public comment.

The first written comment before COAC was from Mr. Nolan (unintelligible last name), read by Mr. Troy Martin from the Office of Trade Relations. The statement reads that providing further instruction and speeding up the process concerning compliance reviews would save their company and many others from high costs and delays. He respectfully requests that COAC create an initiative or pilot program for the FDA to expand its Trusted Trader Program to drug importers. The FDA has advised us that this request should come from COAC, specifically the 1-USG Work Group.

Executive Director Neuhart notes the comment for the public record and will route the comment through the appropriate channels.

The following comment was made by Leonard Feldman, who commented that CBP's 21-CCF paper indicates that CBP will share the COAC-approved 21-CCF legislative discussion draft with the original stakeholders that had displayed interest in advancing these priorities on Capitol Hill. He asks if CBP advised the congressional officials not to move forward with any 21-CCF legislation until COAC, with CBP's input, provides facilitation recommendations as mentioned.

Executive Director Neuhart responded to the comment (audio cut out/no audio).

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Executive Director Felicia Pullman requested a motion to submit the three 21-CCF Task Force recommendations. Mr. J.D. Gonzalez moved to offer all three recommendations, which Ms. Kathy Wilkins seconded. Then, calling for a vote and having heard no objections, the 21st Century Customs Framework recommendations were unanimously submitted. Please see the Appendix for the complete list of recommendations.

Executive Director Pullman asked for a motion to submit the two ACE 2.0 Working Group recommendations. Mr. Tom Gould has moved to submit the recommendations, which Mr. David Corn seconded. The recommendations were voted on and unanimously submitted. Please see the Appendix for the complete list of recommendations.

Executive Director Pullman inquires if there is a motion to submit the one eCommerce Task Force recommendation. The motion was made by Ms. Jody Swentik and seconded by Mr. John Van Walleghen. COAC unanimously agreed to submit the recommendation. Refer to the Appendix for the full set of recommendations.

RAPID RESPONSE SUBCOMMITTEE

Subcommittee Co-Lead Julie Pojar explained that they did not meet as a Subcommittee but did receive regular updates from the Broker Modernization Working Group and the Domestic Manufacturing and Production Working Group. Further, the USMCA Working Group has reconvened from hiatus.

BROKER MODERNIZATION WORKING GROUP

Working Group Co-Chair John Van Wallaghen stated that although they do not have any recommendations at this time, they have been meeting consistently. They have focused on the upcoming October broker exam and have been sharing ways to streamline the exam with CBP for the most optimal and efficient results.

DOMESTIC MANUFACTURING AND PRODUCTION (DMAP) WORKING GROUP

Working Group Co-Chair Julie Pojar explained that DMAP believes that over the last few years, IPR smugglers have been increasingly using all available transportation modes to ship their products and impacting domestic manufacturers and producers. Additionally, there has been an increase in eCommerce-type shipments and the use of de minimus.

The working group supports continuing the 321 Data Pilot and the Entry Type 86 Pilot. The pilots are a crucial step in understanding its leveraging of new tools and how enhanced entry will increase CBP's ability for enforcement measures with de minimus shipments.

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Executive Director Robert Kossowsky thanked the members of the Rapid Response Subcommittee for their continued leadership and hard. They continue to focus on modernizing the import/export process, including trade intelligence and maximizing efficiencies that better position the trade community and CBP for the future.

The new Domestic Manufacturing and Production Working Group met for the first time in April 2022 and was tasked with understanding areas of Trade within CBP's authority impacting domestic industries. They've held in-depth discussions on topics such as intellectual property rights enforcement and de minimus shipments, reflecting a wide array of domestic manufacturing interests in this group. They've also started assessing the impact of the strong U.S. dollar, import trade trends, and CBP trade enforcement.

Briefly Touching on the efforts of the Broker Modernization Working Group. They are focusing on various efforts, including the 19 CFR 111, and working with CBP to review changes in the Notice of Proposed Rulemaking. Additionally, with the next customs broker license exam coming up on October 25, 2022, a remote testing option and testing centers will be available for those who wish to take the exam.

Executive Director Kossowsky is pleased to share that the USMCA working group has reconvened after a brief hiatus. The yearly volume of USMCA is the most utilized free trade agreement adopted by the U.S. in the automotive, agriculture, and electronic sectors. Given that importance, they have revamped the group to consist of COAC members, industry representatives, and stakeholders. The working group will focus on implementing and enforcing USMCA's Chapter 7 on Customs Administration and Trade Facilitation. They are also to provide CBP with valuable feedback on private sector challenges regarding compliance within the agreement.

PUBLIC COMMENT

Office of Trade Relations Deputy Executive Director Valerie Neuhart opened the floor for public comment. No comments were heard from online participants or those who attended in person.

SECURE TRADE LANES SUBCOMMITTEE

Subcommittee Co-Lead Angela Cook noted that the Subcommittee comprises five working groups: Cross-Border Recognition, Export Modernization, In-Bond, Trade Partnership and Engagement, and Remote & Autonomous Cargo Processing.

CROSS-BORDER RECOGNITION WORKING GROUP

Working Group Co-Chair J.D. Gonzalez explained the group was created to work with CBP on issues relating to strengthening cross-border supply chains and improving land border operations. They have had five crucial meetings, which have continued bi-weekly. However, they currently do not have any recommendations.

EXPORT MODERNIZATION WORKING GROUP

Working Group Co-Chair David Corn stated the group has had well-attended bi-weekly meetings. Within the group is a smaller focus group working on getting trucking manifests on the same level as Air, Ocean, and Rail. The focus group currently does not have any recommendations. However, the Working Group has two recommendations it will be presenting.

The Working Group as a whole has been working on enhancements from the June meeting on the electronic export manifest document that was recommended during that meeting. From that suggestion, they have developed the paper Electronic Export Manifest Pilot Document Outlined Benefits for Why You Need to Participate, which was released publicly before this COAC meeting. The paper outlines the background and vision of the Electronic Export Manifest, provides features of the program, outlines what's changing within the pilot, and explains why additional carriers and consolidators, IACs, and NVOCCs are needed to engage in the Electronic Export Manifest Pilot.

The Export Modernization Working Group recommends that CBP publish the "Electronic Export Manifest Pilot Document: Outlined Benefits for Why You Should Participate" paper. The document should be posted to CBP.gov, and a corresponding Cargo Systems Messaging Service email should be sent to the trade to maximize the reach for pilot participation and expansion.

Their second recommendation is for CBP to perform an internal review to determine the necessary resources to support additional pilot participation in advance of the Notice of Proposed Rulemaking for the Electronic Export Manifest for Rail, Ocean, and Air modes of transportation.

IN-BOND WORKING GROUP

Working Group Co-Chair Chris Everly briefly updates that they have had three group meetings and touched on their topics. He notes that they have no recommendations to present at present.

TRADE PARTNERSHIP AND ENGAGEMENT WORKING GROUP

Working Group Co-Chair Kerry Novak explained they changed their name from the Partnership Program and Industry Engagement Working Group. While the group could not meet this quarter, the CTPAT team held a summit and worked on the new forced labor CTPAT requirements, the CTPAT Trade Handbook. The group currently has no recommendations.

REMOTE & AUTONOMOUS CARGO PROCESSING WORKING GROUP

Working Group Chair Stephen Simmons elaborated that the group was established to identify a vision of autonomous conveyance and to speculate how Customs operations should be built to include efficiencies of the Trade and U.S. Government. They have proposed the limited Remote & Autonomous Cargo Processing Technology Pilot Program, which has led to the Working Group being placed on a current hiatus.

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Thomas Overacker, Executive Director for Cargo and Conveyance Security, thanked and acknowledged each member and co-chair for all their hard work. With respect to the Export Modernization Working Group and their recommendations, he stressed that Electronic Export Manifest Pilot is an interim measure. This will be the vehicle to get where they need to be in order to public regulations that are to be required in all modes of electronic export manifests.

PUBLIC COMMENT

Office of Trade Relations Deputy Executive Director Valerie Neuhart opened the floor for public comment. No comments were heard from online participants or those who attended in person.

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Executive Director Pullam called for a motion to submit the Export Modernization recommendations. Ms. Julie Pojar has moved to submit the recommendation, and it was seconded by Mr. Chris Everley. Having been unanimously agreed, the recommendation was submitted. See the Appendix for the complete recommendation.

CLOSING REMARKS

Executive Director Felicia Pullman reminded COAC that the next public meeting will be on December 7, 2022, in Washington, D.C. She thanked all the participants and adjourned the meeting at 3:17 P.M.