

**Commercial Customs Operations Advisory Committee
Secure Trade Lanes Subcommittee
In-bond Working Group
Draft Recommendations**

March 2023

COAC

**COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE**

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Secure Trade Lanes Subcommittee
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Draft Recommendations

1. COAC recommends that 19 CFR 18.1(i)(1) be amended to extend the maximum in-transit time from 30 days to 60 days for all merchandise to be transported in-bond. Currently, only merchandise transported via barge is allowed 60 days. Extending the in-transit time will harmonize the threshold across all modes and accommodate movements requiring additional transit time, alleviating the need to request extensions.
2. COAC recommends that CBP provide Trade with the ability to electronically request an extension of in-transit time via ACE or CBP-approved EDI system for all merchandise to be transported in-bond. Currently, 19 CFR 18.1(i)(2) requires extension requests to be submitted in writing to the port director at the port of destination or port of exportation. Moving to a paperless solution will streamline the request process and is consistent with other in-bond requests, such as diversions.
3. COAC recommends that CBP communicate all in-bond hold messages in real-time via push messaging in a CBP-approved EDI system. Currently, Trade is required to proactively query each master bill of lading multiple times during the life of the shipment to check for a hold status. The current process is inefficient and burdensome for Trade, with most queries resulting in no hold. Recognizing that holds are important, CBP should actively push out real-time hold notifications eliminating the need for Trade to query every in-bond movement.