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**UNITED STATES DEPARTMENT OF COMMERCE**  
**Economics and Statistics Administration**  
**U.S. Census Bureau**  
Washington, DC 20233-0001

**FTSR Letter No. 174**

**To:** U.S. Customs Service Headquarters, Directors of Field Operations, Port Directors, Foreign Trade Zone Operators, Department of Commerce District Offices, Exporters (U.S. Principal Parties in Interest), Freight Forwarders, Exporting Carriers, Consolidators, U.S. Customs Brokers, and All Others Concerned

**From:** U.S. Census Bureau (Census Bureau)

**Subject:** Reporting Requirements and Clarification of U.S. Principal Party In Interest (USPPI) for Merchandise Imported into the United States for Export to a Third Country of Ultimate Destination

This is to clarify requirements for filing a Shipper's Export Declaration (SED) or Automated Export System (AES) record for merchandise imported into the United States from a foreign country for export to a third country of ultimate destination. In situations where merchandise is being shipped through the United States for export to a third country of ultimate destination, but is first entered for consumption or for warehouse in the United States, a SED or AES record must be filed when the merchandise is exported out of the United States.

Only a U.S. entity can be designated as the U.S. Principal Party In Interest (USPPI) on the SED or AES record. Usually, this will be the U.S. importer of record shown on the Customs Form 7501 entry summary. By law the importer of record is the owner or purchaser of the imported merchandise, or a licensed U.S. Customs broker appointed by the owner, purchaser, or consignee of the merchandise. However, there may be instances when the importer of record on the Customs Form 7501 is a foreign entity. In this situation, the USPPI will be the U.S. resident agent designated by the foreign importer for service of process. In such cases, the USPPI on the SED or AES record will not match the importer of record listed on the entry summary.

The USPPI is thereby responsible for following the provisions for the USPPI as specified in the Foreign Trade Statistics Regulations, Title 15, CFR, Part 30, §§ 30.4 and 30.7. The USPPI, in this circumstance, is required to provide the import entry number on the SED or AES record.

Every effort must be made by all parties in these transactions to comply with the provisions contained in the Foreign Trade Statistics Regulations, Title 15, Code of Federal Regulations, Part 30. If you have any questions concerning these requirements, please contact the Regulations, Outreach, and Education Branch, Foreign Trade Division, on 301-457-2238.

A handwritten signature in black ink, appearing to read "C. Harvey Monk, Jr.", written over a horizontal line.

C. HARVEY MONK, JR.  
Chief, Foreign Trade Division