Teresa Telesco

From: asia <asia@eastbridgebooks.org>
Sent: Saturday, July 28, 2012 12:14 PM
To: Teresa Telesco
Subject: BIS Request for Public Comments on Shipping Tolerances for Export Licenses

Good Morning, Teresa,

Comment...
Having a centralized, uniformly-applied, easily-auditable on-line algorithm is a very good idea. It would clearly facilitate successful enforcement of the compliance duties of the agency--with all the positive (carrot) and negative (stick) connotations of that role--and pose no discernible difficulties for exporters.

The shipping tolerance regulations are straightforward and transparent and both accessible and understandable by anyone. Deployment of a uniform web-based calculator would simplify everyone's life at insignificant cost. I can assure you even the least experienced industry exporter using Excel has already produced a worksheet accomplishing the same thing and any novice industry exporter using Access has already created a more elegant solution. Neither of these, of course, offers the assurance-of-accuracy and ease-of-central-audit compliance benefits of a centralized on-line system. The point is that the benefits are real while the actual coding and education effort involved are trivial.

My major disappointment in BIS is that such an obvious efficiency has not been implemented at some point within the past several decades since the introduction of the personal computer in 1980 or the extension of the internet by implementation of the world-wide-web in 1990. Nowadays everyone is touting the "cloud"--whatever--there's no time like the present.

It is CRITICAL however, that ANY centralized, uniform automated system be implemented for ALL THREE applicable measurement parameters--value, unit, and volume--not solely for value. The benefits for both exporters and compliance officers of a wholly-uniform solution for the entire shipping tolerance calculation are difficult to overstate. The biggest challenge will be exporter education in applying the new global system which, since everyone already HAS a local system in place, should also be trivial. I suspect that any exporter finding a uniform, centralized shipping tolerance calculation confusing shouldn't have been permitted in the first place--and therefore should never be faced with using the new shipping tolerance system.

Conclusion...
Do it--but for the COMPLETE set of shipping tolerance measurement parameters--and how about a realistic deadline of "before lunch"?.

My qualifications to comment...
I am a "small business" owner and we export items not covered by EARs but I should be disappointed if that disqualifies my comment for consideration. OTOH, I am also a retired USCG finance officer and member of the American Society of Military Comptrollers (ASMC). My undergraduate degree is from Harvard (1970) and my MBA is from the Tuck School at Dartmouth (1972). My dozen-year corporate career with two Fortune 50 companies was primarily in the corporate treasury function.

Sincerely,

Joe

CDR JC West USCG(ret)

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