Teresa Telesco

From: Dana Goodwin <DGoodwin@tradelinksystems.com>
Sent: Tuesday, August 21, 2012 3:38 PM
To: Teresa Telesco
Subject: Shipping Tolerance of Export Licenses

Dear Teresa,

I am aware that the comment period closed yesterday on this topic but I am hopeful that my comment below will be considered. I am responding specifically to the following:

"BIS is seeking information that would help it determine: Whether an automatic calculation of the dollar value-based shipping tolerance in AES (electronic decremention) would assist exporters in maintaining compliance with the allowable shipping dollar value of the license."

As relates to DSP-73 and DSP-61 licenses, this proposal will not work. When items are returned to the US under a DSP-73 that has been issued for a "series of departures and returns" (which is the case in almost all DSP-73's), the item quantity and item value are restored to the license (added back). However, the restoration does not occur "automatically" because CBP's Automated Broker Interface (ABI) does not communicate with Automated Export System (AES). In fact, the license number, item quantity and value data are not captured in the ABI system. The reconciliation is and always has been a manual method.

The same situation exists with DSP-61 temporary import licenses: when items are exported after having been decremented at time of import, the item quantity and value is restored (added back) to the license, and again, this is tracked manually.

Please let me know if further clarification of my comment would be helpful.

Respectfully,

Dana Goodwin

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