DAY 1 - TUESDAY MARCH 6, 2012

Overview: e-Manifest: Rail and Sea (M1) – *Jim Swanson, Director, Cargo Automation Coordination, Office of Field Operations (OFO)*
- **Questions:**
    1. Several Service Center representatives indicated they were still holding back on testing in M1 as they were not clear about CBP deployment plans.
        - Response - CBP stated that there are several service centers that have completed M1 testing. If you need assistance you should contact your Client Representative.
    2. Question: What type of access do filers/users have to the manifest reports?
        - Response: The carrier, as the trade account owner, has the authority to grant access to the importers, and other filers of the manifest information.
    3. Question: Can importers get access to in-bond reports?
        - Response: The carrier would need to grant access to their importers to get in-bond information.
    4. Question: Is there any way we can determine who might be using our bond?
- **Action Item 1**: CBP will follow up with you to provide a step by step instructional, showing how to do a customized report that reflects who is using your bonds.
- **Response:** CBP is currently working with the trade to see if the In-Bond Details Report can be modified to identify when another party has obligated the carrier's bond. It appears that security is prohibiting the trade from seeing that information. CBP also discovered that if there are multiple users of the bond (i.e. additional IR numbers) we only show the primary IR number associated with the bond. The system will not allow the trade access to all of the information needed to determine who might be using their bond.

Changes to Message Formats – *Randy Slusher, Jim Klosko*
- **Questions:**
    5. Will production issues in the ACE environment be fixed by end of March based on discussion at the CESAC meeting?
        - Response - CBP is working on these fixes. Most are AMS/ACE synchronization issues and the goal is to have all fixes completed by the end of March to mid-April.
    6. Question – Can you speak to the ability for a carrier to close an in-bond?
        - Response - If you have QP you should be able to close the in-bond.
    Action Item 2: Can a carrier receive multiple container level holds from different PGAs and can CBP clarify the process for handling PGA holds in ACE?
    Response: A Carrier can get container level holds from multiple PGAs. A carrier can get multiple holds from different PGAs, i.e. 1H hold messages.
        - Per Bill Delansky policy changes will be required to handle certain holds.
        - Per Vinny Annunziato – you cannot get multiple holds from one PGA. PGA holds are not active in M1 today. PGA holds will not be activated until AMS is decommissioned and the PGAs have final MOUs.
        - In addition to the responses cited above, CBP has not yet finalized policy on all PGA hold activity. CBP is working with the ITDS Board of Directors and the individual PGAs to finalize this policy. All PGA hold authority will be based on the specific PGA's statutory and regulatory authority to hold cargo, presence at the Port of entry, and the final Operational Memoranda of Understanding (MOUs) and Interconnectivity Security Agreements (ISAs) in place with CBP.

- **Action Item 3**: Can the trade get a list of only the new disposition codes?
- **Response:** Per Jim Klosko - This will take a significant amount of time to put together. We can follow up with you to see if this is something we can provide.

Trade Pilot and Trade Testing Status – *Becky Lally, Ocean AMS, Jim Wolford Rail AMS*
Summarized CBP Responses to Questions:
7. All scenarios including diversions will be available for testing during the test phase.
8. Testing will demonstrate the use of PGA disposition codes. For those Terminal Operators who are dealing with multiple carriers and run into a lot of complicated transactions, testing scenarios can be developed in conjunction with the carriers with whom they are doing business to test specific types of transaction scenarios.
    - **Post Meeting Addendum:** Becky has created the testing scenarios for terminal operators and they have been distributed to the client reps.
9. Similar testing can be done with broker download.
10. Terminal Operators will get a specific code that indicates an in-bond diversion.
11. It is still taking an average of 25 days to do certification. It can take more or less the same amount of time, depending on workload complexity, and dedication of the client.

Summarized CBP Responses to Wrap Up Questions
12. QP/WP will no longer work after CBP decommissions AMS. Several CSMS messages have been issued on how carriers should prepare for ACE M1.
    - **Post Meeting Addendum**: A spreadsheet of the changes to the impacted ABI messages was distributed as an attachment to CSMS Message #12-000082.
13. We have a new developer working on air in-bond functionality. Bill Delansky is heading this effort.
    - This will be part of an AMS solution not an ACE solution.
    - Air manifest in ACE is still down the road.
18. CBP will turn off AMS for ocean and rail manifest. CBP cannot afford to keep 2 systems running much longer. For M1, the functionality is all there. CBP plans to issue an FRN by the end of the month and will turn off AMS by the end of September.
    - **Post Meeting Addendum:** The FRN was published on March 29, 2012 (*see* CSMS# 12-000108 - ACE Ocean/Rail Manifest Federal Register Notice Published Today, issued March 29, 2012).
19. Carriers and service providers need to take steps to get involved in ACE now.

DAY 2 – WEDNESDAY, MARCH 07, 2012

Welcome – Cindy Allen, Jim Byram
- **Questions**
    1. What is the timeline for deployment of e-Manifest for Air Manifest?
        - Response – CBP may be able to modify the ACE rail manifest code for reuse for air manifest, but there is no definite deployment schedule for air manifest yet.
    2. Is Remote Location Filing available for entry summary?
        - Response - RLF is available for entry types 01 and 11.
    3. Will ABI programming for in-Bond need to change when ACE becomes the System of Record.
        - Response - Yes and CSMS messages have gone out on this issue.

Decommissioning AMS: Rail and Sea Manifest – Jim Byram, Jim Swanson
- **Action Item 4:** Evaluate the need to issue an In-Bond Authorization User Guide for M1 in a CSMS message. There appears to be confusion in the trade community about how to authorize in-bonds and the rules pertaining to authorizing or not authorizing an in-bond user.
- **Response:** The In-Bond Authorization User Guide was updated and is posted the ACE Modernization page on cbp.gov at: **http://www.cbp.gov/linkhandler/cgov/trade/automated/modernization/ace_welcome/user_guide .ctt/user_guide.pdf**
- We will review the User Guide to determine if any enhancements are needed and will disseminate via a CSMS message in the near future.

Export Manifest Processing – *Bill Delansky*
- **Questions:**
    4. What does CBP mean when it states it is re-hosting AES?
        - Response – Currently the Automated Export System, the Census Bureau's electronic export commodity filing system, is housed on a CBP mainframe computer. The AES commodity data is owned by Census. The AES needs to be enhanced and now is the time to make those enhancements. CBP is planning on enhancing AES and re-hosting it on an ACE platform in order to leverage the commodity data and the manifest data based on required agreements with the Census Bureau.
    5. What is the status of the Document Image System (DIS) for ocean manifest?
        - Response - CBP is planning to test the use of DIS, as an interim solution, for filing ocean export manifest documents. CBP is working with the World Shipping Council to engage carriers in testing this functionality. CBP is targeting the end of March to begin pilot testing of the DIS solution. There are also policy legal and policy issues on sharing data the need to be resolved.
        - **Post Meeting Addendum**: CSMS# 12-000102 was issued on 3/22/2012, announcing the Pilot for Export Ocean Manifest Submission via Email in the Document Image System (DIS).
    6. There are 24 hour rules in the European Union and China requiring the filing of the import manifest 24 hours prior to loading in the U.S. Once a manifest is filed with CBP and the filer gets a "Do Not Load" message from the EU or China how does CBP get notified? Will CBP regulations need to be revised to handle this?
        - Response- CBP will need to establish a reason code to handle this.
- **Action Item 5:** Develop a process for handling the "Do Not Load" message received from the European Union, China or other foreign government.
- **Response:** Per Bill Delansky This has been noted for ocean exports but will be captured in the functional requirement gathering as amendment codes are being identified for exports.

Cargo Release/Simplified Entry – *Vincent Annunziato, Jim Byram, Jeremy Perez, Gary Schreffler, Steve Hilsen, Dave Neuhart, Sabet Chowdhury*
Cargo Release – *Vincent Annunziato*
- **Action Item 6:** CBP needs to issue a policy statement for handling Diversions.
- **Response:** Per Vincent Annunziato: This will be done by OFO and is not an action item for the Cargo Control and Release (CCR) team. CCR will handle the detail of the expected requirements for diversions between the modes and the interaction with the trade. That will be done at the time the functional requirements are written.

- Scenario – An in-bound conveyance is diverted to a different port. Numerous consumption entries have already been filed against cargo on that conveyance. A Diversion was requested by the carrier or directed by CBP because of a national emergency.
- Per CBP, Northern border diversions happen all the time and they are requested by the carrier. This will not impact those types of diversions. There are universal port codes in some of the northern border areas.
- When an SE is filed there is no port assigned. The SE does not take transportation data or port information at the entry. Vinny would like to see this data.

Simplified Entry – *Steve Hilsen, Director of Trade Policy and Agreements*
- **Questions:**
    7. Assuming testing with air goes well when will other modes start?
        - Response – CBP would like to get SE in the ocean environment as soon as possible, i.e., 90 days after air. We would also like to leverage the PGA message set, DIS and RLF when we can fit that in, following the iterative development process.
    8. This data is the same as ISF. Why do we need a separate data set for Simplified Entry - why not use ISF? Will SE satisfy the security filing data under ISF or could ISF push data to SE?
        - Response – Unlike ISF, simplified entry is subject to the regulations for "conducting Customs business." SE is used for entry and release and ISF is used for security filing. CBP is trying to avoid duplicating the collection of data elements but some data elements are required by different parties. We try to reduce as many data elements as we can however some duplicate data elements are required for SE and ISF.
    9. Is SE going to be mandatory for air?
        - Response – No, SE will not be mandatory for entries filed for air. However ISF is mandatory for ocean shipments. The pilot is testing the concept of a simplified entry process and will incorporate the PGA message set. Eventually SE will become part of cargo release.
- **Action Item 7:** Without a port of entry on the SE record how do we know the filer is licensed to file at that port?
- **Response:** Per Vincent Annunziato, SE is in the testing phase and will need to test the viability of not having certain data elements included in the 3461 (HI/HN) transactions. It should be noted that at the time of manifesting, the port code will be on file for the SE and will be validated against RLF rules.
    10. As a company, how do we convince management that we need to participate in ACE and that SE is part of ACE development? There is a lot going on in ACE in a one or two year period and we need to convince management that we need to invest in developing this functionality.
        - Response - It is nice to hear we are putting too much functionality out at once. Per Cindy Allen, we are putting out smaller pieces of functionality that are usable. This will be happening more in the future. As of now some of these programs will not be mandatory but it will be to the filer's advantage to get involved and start using some of this functionality as it will become required in the future. And we are building this functionality only in ACE.
    11. Are we adding a party to the entry and what other changes are there in SE?
        - Response - We are looking for the manufacturer and seller of the merchandise. The Manufacturer/Supplier Name and Address- these elements are the same as the ISF data.
            - Entry Summaries require a MID. CBP wants to get away from the MID as it does not work well. CBP wants to move to a name and address system and SE is the first step in allowing us to do this. We are testing this in the pilot to see

how it works – we may change this in the future. CBP would like to stay with name and address for SE.
- Tariff number may change based on when the shipment was arrived.
- CBP.Gov has a web page that provides more information. The link is: http://www.cbp.gov/xp/cgov/trade/trade_transformation/
- Currently we are focusing on current pilot participants. We will make a determination on when to expand to other trade testers as we go forward.

Document Image System – *Celestine Harrell, Shailesh Sardesai*
No Action Items

PGA Message Set – *Emi Wallace*
No Action Items

SUMMARY OF ACTION ITEMS – DAY 1

ACTION	DESCRIPTION	POINT OF CONTACT	ACTION TAKEN
Action 1 Ref: Q - 2, 3, 4	Follow up on providing step by step instructions showing how to run a customized report that reflects who is using your bonds.	Jim Swanson, Anita Brown	CBP is currently working with the trade to see if the In-Bond Details Report can be modified to identify when another party has obligated the carrier's bond. It appears that security is prohibiting the trade from seeing that information. CPB also discovered that if there are multiple users of the bond (i.e. additional IR numbers) we only show the primary IR number associated with the bond. The system will not allow the trade access to all of the information needed to determine who might be using their bond.
Action 2	Can a carrier receive multiple container level holds from different PGAs and can CBP clarify the process for handling PGA holds in ACE?	Vincent Annunziato, Bill Delansky	A Carrier can get container level holds from multiple PGAs. A carrier can get multiple holds from different PGAs, i.e. 1H hold messages. • Per Bill Delansky policy changes will be required to handle certain holds. • Per Vinny Annunziato – you cannot get multiple holds from one PGA. PGA holds are not active in M1 today. PGA holds will not be activated until AMS is decommissioned and the PGAs have final MOUs. • In addition to the responses cited above, CBP has not yet finalized policy on all PGA hold activity. CBP is working with the ITDS Board of Directors and the individual PGAs to finalize this policy. All PGA hold authority will be based on the specific PGA's legal and regulatory authority to hold cargo, their presence at the Port of entry, and the final Operational Memoranda of Understanding (MOUs) and Interconnectivity Security Agreements (ISAs) have with CBP.

| Action 3 | Provide trade with a list of all "new disposition codes." | Jim Klosko | This will take a significant amount of time to put together. We will follow up to see if this is something we can provide. |

SUMMARY OF ACTION ITEMS – DAY 2

ACTION	DESCRIPTION	POINT OF CONTACT	ACTION TAKEN
Action 4	Evaluate the need to issue an In-Bond Authorization User Guide for M1 in a CSMS message. There appears to be confusion in the trade community about how to authorize in-bonds and the rules that pertain to authorizing or not authorizing an in-bond user.	Jim Swanson, Bill Delansky	The In-Bond Authorization User Guide for M1 was posted on the on the ACE Modernization page on CBP.GOV (reference link above). CBP will review the User Guide to determine if any enhancements are needed and will disseminate via a CSMS message in the near future.
Action 5 Ref Q 6	Develop a process for handling the "Do Not Load" message received from the European Union, China or other foreign government.	Bill Delansky	This has been noted for ocean exports but will be captured in the functional requirement gathering as amendment codes are being identified for exports.
Action 6	CBP needs to issue a policy statement for handling Diversions. • Scenario – An in-bound conveyance is diverted to a different port. Numerous consumption entries have already been filed against cargo on that conveyance. A Diversion was requested by the carrier or directed by CBP because of a national emergency. • Per CBP, Northern border diversions happen all the time and they are requested by the carrier. This will not impact those types of diversions. There are	Vincent Annunziato	This will be done by OFO and is not an action item for CCR. CCR will handle the detail of the expected requirements for diversions between the modes and the interaction with the trade. That will be done at the time the functional requirements are written.

	universal port codes in some to the northern border areas. • When an SE is filed there is no port assigned. The SE does not take transportation data or port information at the entry. Vinny would like to see this data.		
Action 7	Without a port of entry on the SE record how do we know the filer is licensed to file at that port?	Steve Hilsen	SE is in the testing phase and will need to test the viability of not having certain data elements included in the 3461 (HI/HN) transactions. It should be noted that at the time of manifesting the port code will be on file for the SE and will be validated against RLF rules.

DAY 3 – THURSDAY, MARCH 08, 2012

ACE Entry Summary Processing and Documentation Review – *Chuck Woods, John Vandegrift*

- **Questions:**
    1. Are the ACE Reports limited to ACE entry summaries?
        - Response - No, ACE reports include both ACE and ACS entry summaries.
        - Comment: When brokers file entry summaries in ACE, we are challenged on how best to respond in a timely manner based on new ACE processes. For example, CBP can now request documents pre or post summary filing.
    2. We have also been told that CBP can ask for documents in free form text instead of an electronic message. We just want to make sure we don't miss anything.
        - Response: The issue is really with port familiarity with the new ACE processes. You should not be receiving a request for documentation in free form text. If that is happening, please let us know. However, filers may receive a request for specific documents in a UC message (disposition type code = 3) created by a CBP user. The specific documents will be identified in text contained in the remarks of the UC message E3-record.
    3. Does Appendix H for the Census Override give the mapping for the warning and the code for overriding?
        - Response -Yes
    4. If we get a Census Warning and we realize we made a mistake in the data, can we override the error?
        - Yes, you can correct the entry summary data and retransmit the AE to ACE.
    5. When we get a Census Warning and we try to override it, will we get a reject?
        - Response - If the entry summary is in trade control you can retransmit the AE or submit the CW transaction to override just that Census Warning.
    6. If we are not filing ACE entry summaries can I still get access to the AD/CVD information on the ACE Portal?
        - Response - You do not need to be filing ACE entry summaries to have access to the AD/CVD reference information, however, you do need to have an ACE Portal Account.
    7. How do you determine whether an article should be subject to AD/CVD?
        - Response - You will receive an informational message from the system if the HTS number used on an entry summary line is listed for any one case for the country of origin of that line.
    8. Does ACE use the HTS flag indicator for purposes of AD/CVD?
        - Response – No, ACE looks at the HTS number, country of origin, and the date that is applicable.
    9. Will the Korean Free Trade Agreement be updated in ACE?
        - Response – Yes, the implementation instructions were drafted as a result of the legislation- we couldn't make the changes until we received those instructions. We are currently working on the HTS updates. This will not be in the system by March 15.
        - **Post Meeting Addendum**: System updates were available on March 21, 2012 as announced in CSMS Messages #12-000100 and #12-000081.
    10. We need 90 days of testing before we can move to a production environment; CBP has not always been consistent in giving us the full 90 days. Can you give us those 90 days for both fixes and new functionality?

- Response - For new functionality, we always try to give you as much time as possible, however, that is not always possible, as is the case for example, with any new legislation that issued. Fixes are a different situation- we would not provide 90 days of testing.

11. When the QP changes are made, will that become part of the ACE functionality? That is, will we be using the same entry summary batch and block for ocean/rail?
    - Response – Yes, you will use the control record specifications for your inbound transactions as found in the ACE ABI CATAIR Batch and Block Control chapter.