



MARITIME EXCHANGE

for the Delaware River and Bay

Leading the Way to Port Progress

John T. Reynolds, Chair
Uwe Schulz, Vice Chair
Dennis Rochford, President
Lisa B. Himber, Vice President
A. Robert Degen, Esq., Secretary, Solicitor
James F. Young, Esq., Assistant Secretary
Dorothy Mather Ix, Treasurer

March 5, 2009

Mr. Allan J. Martocci
Area Port Director
U.S. Customs and Border Protection
2nd & Chestnut Streets
Philadelphia, PA 19106

Dear Mr. Martocci:

On behalf of the Delaware River trade community, please allow me to thank you and your staff for conducting the informational sessions in January to discuss the implementation of the Importer Security Filing and Additional Carrier Requirements (10+2) regulation. We very much appreciate your willingness to listen to our concerns and work with the trade to meet compliance.

It is obvious from the twelve-month flexible enforcement period that CBP understands the complexities that importers, carriers and service providers face complying with the regulation. As indicated in the discussion session, it is our understanding that you and your staff are sensitive to these issues as well and as such will not be placing cargo on hold or levying fines, provided that there is a demonstrable effort to meet the requirements.

The purpose of this letter is to update you, on behalf of our TRACS users in the region, of our ongoing efforts to meet compliance. Immediately after the rule was issued last November, we reached out CBP with specific technical questions. Unfortunately, after multiple calls and emails, CBP HQ did not provide guidance until the FAQ was published on January 25, 2009, one day prior to the effective date. We worked throughout February to canvass system users regarding their stow plan and container status message needs and have begun to document required changes to our TRACS system. We expect to complete this work in March, after which we will then begin programming. We will keep you informed of our progress.

Again, thank you for your ongoing willingness to work with us as we make the necessary changes to meet compliance. Please feel free to contact me with any questions you may have or if you would like additional information.

Sincerely,

Lisa B. Himber
Vice President