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August 2, 2011

U.S. Customs and Border Protection
Attn: Tracey Denning
Office of International Trade/Regulations and Rulings
799 9th Street, NW
5th Floor
Washington, DC 20229-1177

Re: Agency Information Collection Activities: Vessel
Entrance or Clearance Statement (Form 1300)

To Whom It May Concern:

The Maritime Exchange for the Delaware River and Bay is pleased to submit these comments in response to the July 5 Notice and Request for Comments regarding vessel entrance and clearance information collection. We applaud U.S. Customs and Border Protection (CBP) for its efforts to reduce paperwork.

As information, the Maritime Exchange is a non-profit trade association representing nearly 300 port businesses and related organizations within the tri-state Delaware River port complex. In addition to serving as an advocate for the \$4 billion commercial maritime industry in the region, the Maritime Exchange has developed and operates a port-wide maritime information and intelligence network on behalf of its membership. Included in this system are an electronic notice of arrival/departure filing component, which facilitates members' compliance with both CBP and Coast Guard regulations for filing advance electronic vessel, crew and passenger information, and a CBP certified Automated Manifest System (AMS) for electronic submission of manifest data as required by 19 CFR.

Because of our unique dual role as information service provider and liaison between the local steamship community and federal regulatory agencies, the Maritime Exchange has a keen understanding of the challenges facing both the regulated industry and the government agencies responsible to collect continually increasing amounts of information.

Maritime Exchange members have worked closely with CBP to identify opportunities for improvement, streamline operations, and eliminate redundancy, inefficiency and waste wherever possible. Coupled with the commercial and trade aspects of data submission,

Exchange members have also dedicated their time and expertise to help furthering the agency's security mission by providing guidance and suggestions on proposals to increase the volume of data required and expand the pre-arrival filing timetables.

Most recently, the Exchange, together with the World Shipping Council, has worked with CBP to develop a paperless I-418 Passenger List/Crew List process. This work resulted in the pilot program currently in production. Much like the I-418 form, most of the information required on form 1300 is already available through the CBP AMS submission and the USCG Notice of Arrival/Departure.

Accordingly, we strongly support federal efforts to automate data collection and eliminate the need to deliver documents by mail, facsimile, and hand delivery wherever possible.

It is with this goal in mind that we offer the following comments for consideration:

We recommend that CBP discontinue collecting paper 1300 forms and utilize the data already received via the manifest and electronic Notice of Arrival/Departure. Those few data elements which are unique to the 1300 can and should be added to an existing system, such as ACE. We also recommend the use of electronic signatures if needed for Masters' certifications.

The complex paper process, wherein vessel operators or their agents must submit original 1300 forms to CBP at the vessel's arrival could be eliminated. This would save hours of work time in completing the paper forms, as well as eliminate paper processing and storage charges for CBP.

Given the success of the current partnership between CBP, Coast Guard and industry to facilitate electronic data exchange, we are confident that expanding the existing system can be done in a timely, efficient and cost-effective manner.

Thank you for the opportunity to submit these comments.

Sincerely,



Lisa B. Himber
Vice President