

COAC Advance Cargo Information Subcommittee

Truck Workgroup

March 14, 2003

Recommendations

Several meetings took place among the truck workgroup during February and March 2003. Discussions took place to generate recommendations to satisfy the pre-notification requirements established by the Trade Act of 2002. The recommendations are as follows:

1. The workgroup supports the goal of the Trade Act of 2002 to provide cargo information prior to arrival at border crossings for both imports and/or exports. Any requirement for pre-lading information should be eliminated; this is not only logistically impossible, but goes well beyond legislative requirements.
2. The workgroup believes that the Automated Commercial Environment (ACE) and the electronic Truck Multi-Modal Manifest solution are close at hand. However, the trucking industry has multiple sectors with limited current automation. Therefore, any interim solution prior to ACE roll-out should be implemented on the trucking industry last to minimize any negative economic impact and disruption to the trade.
3. Pending the roll-out of ACE:
 - Existing systems, including carrier proprietary systems and processes approved by Customs, should be used to satisfy the statute's requirements for electronic pre-notification. There should be no new systems development costs imposed on the trade during the interim period for either import or export.
 - The current in-bond processes should remain in place, pending implementation of ACE.
 - During the interim period prior to the implementation of ACE, there should be a single pre-notification process that is consistent for all Government agencies.
4. Implementation of electronic pre-notification requirements should not be allowed to compromise in any way the expansion of expedited processing options such as *FAST/NCAP* to all land border crossings.
5. A policy of port uniformity for import and export processes should be consistently applied at all ports along the northern and southern borders.

6. There should be no restriction on the number of shipments processed per trailer utilizing PAPS at primary. This recommendation minimizes the need to refer such shipments to secondary.
7. A C-TPAT/*FAST* Carrier/Driver utilizing the *FAST* lane will be given priority/preferential treatment if referred for further processing or be immediately released to their bonded facility.
8. Customs should develop and widely publicize a contingency plan for handling loads arriving without any form of pre-notification. This plan should minimize delays of compliant loads.
9. Current exemptions from export reporting should be maintained, along with existing post-export options for approved parties.
10. Parties should not be held liable or subject to penalties for incorrect/incomplete data provided by other parties. Clear mitigation guidelines should be established and should be uniformly applied among ports.
11. The COAC Truck Workgroup has developed four Highway Carrier models:
 - PAPS Highway Carrier Model (Non-*FAST*)
 - BRASS Highway Carrier Model
 - Expedited Highway Carrier Model (*FAST*)
 - Highway Carrier Export Model