



# The American Companies

## "News Flash"

February 11, 2008

**Please see this very important memo written by one of the industry leaders in Customs Bonds and Surety products and services.**



### Important Notice

## 10+2 as Relates to Import Bonds

February 11, 2008

Importer Security Filing requirements (The "10" of "10+2") have been a controversial subject within the international trade community since CBP began widely discussing this about a year and a half ago. Following publication of the Notice of Proposed Rulemaking (NPRM) on January 2, interest and concerns have increased dramatically. Like you and your colleagues in the international trade community, Roanoke Trade and our sureties were taken by surprise when CBP included liquidated damage provisions (in the form of significant changes to Activity Code 1 bond conditions) in the NPRM. For further details on these provisions, see pages 102 and 110 of [Federal Register - January 2, 2008; Volume 73, Number 1](#).

Roanoke Trade opposes bonds/liquidated damages as an Importer Security Filing enforcement mechanism and we believe that our position is also in the best interest of our clients. If you have not already carefully read the NPRM in its entirety, we encourage you to do so without delay. Your company will not want to forego the opportunity to comment on this significant initiative either directly or through your affiliated trade association; and we hope you will join us in opposing the inclusion of import bond provisions.

The deadline is March 18 and comments may be submitted via the [Federal eRulemaking Portal](#) (follow the instructions for submitting comments via docket number USCBP- 2007-0077) or via mail to: Border Security Regulations Branch Office of International Trade Customs and Border Protection 1300 Pennsylvania Ave., NW (Mint Annex) Washington, DC 20229.

See the [Federal Register notice extending the comment deadline](#) for further comment filing requirements.

Roanoke Trade Services, Inc.

TAC Comment: This new requirement will have major impact on our industry. We anticipate that it could likely increase the supply chain timing of all companies as well as add additional expenses from bond charges for the added liability to service fees for the additional labor in handling. NOW is the time to voice your opinion to the Department of Homeland Security, Customs Border Protection. The American Companies have written several news letters and news flashes on this subject. If you require a copy please do not hesitate to contact your client representative. Should you have any specific questions or wish to discuss this with a representative of The American Companies, please send a detailed e-mail with your contact details to Marc Greenberg, President at [marc@shipamerican.com](mailto:marc@shipamerican.com) and he will be happy to contact you as soon as possible.

### The American Companies

250 Moonachie Road (HQ Office - Full Service)  
Moonachie, NJ 07074 (201-478-4600  
0782)

400 Oceangate, Suite 1106 (Full Service)  
Long Beach, CA 90802 (562-435-2327)

881 Route 83 (Full Service)  
Bensenville, IL 60106 (630-860-  
0782)

Domestic USA Ground Operations  
Domestic USA Air Operations  
Asheville NC 828-271-2061

3PL Locations  
Fairview, NJ  
Santa Fe Springs, CA  
Bensenville, IL