



# The American Companies

## "News Flash"

November 30<sup>th</sup>, 2009

### Importer Security Filing Update – Less than 60 Days to go until Enforcement

**ISF Quantitative Benchmarking and Timing** – At this stage in the ISF implementation process you should be well along the way now and should be using the tools we provide to measure the quantity of your ISF filings against your total overall ocean imports. Your quantitative compliance percentage should be at least 95% or better with the need to reach 100% by January 26<sup>th</sup>.

From a timing perspective CBP (Customs) will most likely continue to be lenient after January 26<sup>th</sup> and as a result will more than likely benchmark timely filings based on the timeline of 24 hours prior to ETD. However do not be fooled, the interim rule as well as CBP officials confirm that a timely filed ISF needs to be filed no later than 24 hours prior to container lading on vessel. Ultimately CBP will no longer practice leniency – so be prepared! Do not use this extended period of leniency to avoid filing sooner and as required.

If you have not reviewed our ISF Quality Assurance reports we strongly suggest that you do so NOW and take immediate action to insure that you or your supply chain partners are providing TAC with the required information needed in order to insure your ocean import supply chain is compliant. If you need assistance or have not been getting your ISF Quality Assurance reports please contact Keri Ann Sanabria at [kerianns@shipamerican.com](mailto:kerianns@shipamerican.com) or call 201-478-4634.

**ISF Compared to Entry Details** – While CBP has confirmed that they will be comparing ISF data to data filed at the time of entry, it should be noted that MID information (manufacturers address) that CBP has on file has been noted to be “not very accurate in most cases” and one should note that the rules for MID creation and use in the entry data set differs from that of the ISF data set where actual manufacturer and separate seller are required. That said, given all the variances in how these entities are listed on the ISF vs. the Entry, it will be difficult at best for CBP to make comparisons. TAC’s reports do a fine job at applying some business rules that allow some levels of flexibility and take into consideration the variant rules for each, but in some cases slight differences will be reported. One should not attempt to get too exact in these areas.

However when it comes to country of origin and HTS number, a much higher degree of accuracy must be demonstrated and these areas should be focused on to insure 100% compliance. Variations in these areas would raise some concerns with CBP officials. Our exception based reports detail a mismatch in red and includes the appropriate comment.

“Ship To” locations should also be monitored as CBP does have access to this information via the steamship lines once a delivery order is presented by the receiving carrier to the delivery clerk. Our reports will only show exceptions and please...don't forget to report those diversions. You have an obligation to change an ISF if more accurate data becomes available 24 hours prior to the vessel arriving at its first USA port of call.

**ISF Record Keeping** – As part of our continued efforts to “Go Green”, we are making pdf images available of all ISF filings and will offer as follows: 1) As part of an electronic billing package e-mailed to our clients upon request. 2) As available on our ISF Web Portal 3) Coming Soon: available on AmeriWeb and AmeriTrack. These alternatives are in addition to the current auto e-mailed pdf ISF status report. If you wish to receive an electronic billing packet from TAC contact Michele C. Figueroa at [michelef@shipamerican.com](mailto:michelef@shipamerican.com) or 201-478-4670.

#### The American Companies

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

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  
Carson, CA  
Bensenville, IL

<http://www.shipamerican.com>