THE WORLD ACADEMY

Volume 1, Issue 59

Spring 2016 Quarterly Ed.

THE COMPLIANCE JOURNAL

The Pros and Cons of Binding Rulings

By Jasmin Marin, LCB
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INSIDE THIS ISSUE:

Perhaps one of the more underutilized privileges extended to importers involves the filing of formal customs binding ruling requests concerning the import admissibility for any number of their products into the United States. More often licensed customs brokers, or customs attorneys, are contacted for advice on questions pertaining to matters such as what their classifications should be for their products or whether their goods would qualify for NAFTA. In many cases, these resources provide valuable and accurate information, including the ability to perform full product scope reviews. However, there are instances in which counsel from either a customs attorney or even customs broker determinations that warrant additional review or do not exactly agree with item's properties for which a more accurate provision may apply. Or an importer may flat out disagree with the stances of what the country of origin should be from that which a broker claims it should be. It is in precisely these moments that the venture into drafting a binding ruling request letter to Customs should be considered.

Since the inception of the Customs Modernization Act of 1993, US Customs has had the position to provide general advice and guidance to importers for the entry of merchandise into the United States. From classifications, country of origin determinations, rules of marking and labeling, to rulings on qualifications for any number of free trade agreements and valuation or special entry provisions, binding rulings serve the purpose in providing insight and clarification into the interpretive positions over these various areas as held by US Customs. Although it is often easy to be intimidated or wary of contacting Customs, the binding ruling provision has for decades allowed the direct communication between an importer, their broker, or other party-of-interest to request Customs advice concerning a number of areas that typically impact the entry of product into the country. In so doing, affording the importer clarity and providing official standing from Customs on import issues. Additionally, the binding ruling can be applied to an importer's specific product throughout any port of entry allowing Customs specialists nationwide to accept the entry as declared, no matter where the goods arrive to.

Ruling requests can be made well in advance of an intended product's introduction to the U.S. and serve as the guideline for future importations of a specific product (and in some cases similar products) with a sense of reliability and certainty. Once the ruling determination is made for a particular item, however, that ruling must always be cited for all current and upcoming imports of that product…always and forever…unless the ruling is protested and revoked. For some, this creates inflexibility in interpreting the terms of importation for a shipment that may often be subject to long-term monetary impact on an importer's operation not previously accounted for that are later encountered under the definitions of the binding ruling.

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The Pros and Cons of Binding Rulings *Continued*...

While a ruling may indeed possess an advantage to some importers, it is not necessarily the most appealing depending on the circumstances.

In cases where an importer adamantly disagrees with the Custom's determination, that importer will still have to reference the ruling on all incoming entries until it can be protested and overturned by Customs Headquarters or further in the Court of International Trade. This may cover an extended period of time in which an importer may, in some cases, be subjected to a higher rate of duty or unfavorable valuation principle and therefore lead to a prolonged period of financial risk and impact to revenue that was not initially forecasted while the ruling protest is under review and decided upon.

There are importers that for this reason may commonly resort to informal rulings or verbal advice from a Customs import specialist. Although these methods of communication with Customs are available, taking the informal method will impact the uniformity of applying the same tariff or valuations principles throughout other ports of entry and lead to sometimes conflicting information or entry reviews by import specialists from port to port. On the other hand, requesting a binding ruling from Customs on a periodical basis by the importer raises the import compliance profile of that company with Customs. Often, this demonstrates evidence of informed compliance by the importer in pursuing rulings to show the company's involvement and commitment to ensuring accuracy towards entered shipments in their business model.

Whether to decide on pursuing a binding ruling or not, the avenue exists for obtaining a formal Customs position and opinion regarding the terms or conditions of importation for a company's line of products or arrangements without the need to worry or suffer through the confusion of not understanding the reasoning behind Customs' decisions. Some companies strive for a certain number of rulings within their profile, and others prefer to utilize their on-hand expertise or other expert resources. In either case, it's always important to have full and detailed information when concluding and tendering information to Customs.

Importer Acknowledgement of Excellence

By Aricela Valerio, LCB
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Despite all the changes we have been facing in the trade community in recent years, the responsibilities of a customs broker remains a very important part of the import clearance process. Even the most knowledgeable importer still heavily relies on their broker in the import process for the expertise and guidance that brokers are legally bound to demonstrate through brokerage reasonable care standards such as providing expert advice through licensed individuals, providing full and complete information to clients related to their customs business and many others. The customs broker is the primary agent for the importer and communicates with US Customs on their behalf in the process of conducting Customs business. Our duties include advising clients on import regulations and helping them practice reasonable care as an importer to meet the regulatory guidelines detailed in the Modernization Act. To do this the brokerage community must form a relationship with clients and continue to remain the point of expertise through continued informed compliance demonstration as a broker.

Unlike importers who choose their customs broker, we as brokers do not get to choose who our importers will be. When you work for a customs brokerage firm there is typically more than one person handling customs entries for the account of their clientele. Their level of experience varies as well as their strength in different areas. This plays a major role when deciding who handles which importer. After the match is made, it is the job of both the broker and the importer to communicate on all matters. This relationship is essential in remaining compliant during the import process. It is a best practice of brokers to cross train their internal operations team as a demonstration of continued growth and experience in various industries and various accounts.

I have over fifteen (15) years of brokerage experience in my tenure as an international trade professional and have had the pleasure of working with many great importers; however there is one that stands out among them all. Not only because of the communication we have, but because of their level of expertise as an importer that represents the core foundation of content requirements of the Broker Known Importer Program. This importer brings in shipments of vitamins requiring FDA and Prior Notice to be filed. Normally the aforementioned requirements make an entry more challenging, however that is not the case with this importer. The complete documentation is always sent to me in a timely manner including a broker's letter of instruction. This gives me more than enough time to review the documents and see if there are any foreseeable issues that need to be resolved. Immediately after the entry is complete and released I send the importer the customs entry documents for review. They are reviewed and approved within 24 hours and typically no changes need to be made. The importer has demonstrated their internal controls and SOP's to be current and in line with applicable customs regulations and reasonable care.

Consequently, the ample communication and defined process established with this importer makes the clearance procedure smooth and leaves little room for mistakes, making this importer an ideal customer. It is my honor to serve the trade community as an industry expert and licensed customs broker. I am bound by CBP regulations to provide expert advice to my clients related to customs business. My advice to my client is to continue your excellent process of importer supervision and control in your representation of your importer reasonable care standards.

Latest Happenings with the U.S. Export Control Reform Initiative

By Jennifer Saak, Ph.D.
Customs Consultant
American River Group of Companies

"It can be challenging for companies to determine which [rulings] directly impact their day-to-day operations. This article focuses on changes that impact R&D companies across the board, regardless of the global footprint or type of items that are exported."

In the past several months there's been a flurry of activity from the Department of Commerce, Department of State, and the Department of Treasury, the three primary agencies that oversee U.S. export controls. There have been proposed rulings and final rulings covering definitions, cyber-security, fire control/optical guidance systems, surveillance, destination control statements, and dual-use missile technology. Some of these rulings relate to shifts of items from the BIS Commerce Control List (CCL) to the DDTC's United States Munitions List (USML) or the implementation of changes stemming from multi-lateral agreements. Others relate to clarification, interpretation, and a reframing of key regulatory terms. On the sanctions side, the constantly evolving geopolitical landscape has resulted in multiple updates around Russia, Sudan, and Cuba from the Treasury Department's Office of Foreign Assets Control (OFAC).

It can be challenging for companies to determine which changes directly impact their day-to-day operations. This article focuses on changes that impact R&D companies across the board, regardless of the global footprint or type of items that are exported.

"Definitions" Rulings

Two broadly relevant proposed federal rulings are 80 FR 31505 (from the Department of Commerce) and 80 FR 31525 (from the Department of State.) They are parallel proposed rulings that cover basic definitions in the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR). Some of the changes are non-substantive and are primarily for organizational purposes. In those cases, the regulations haven't fundamentally changed; the proposed updates pull in interpretations that were previously published, for instance, through Advisory Opinions, into formal regulatory clauses. An example of this is how BIS addresses authorization for dual-nationals to access controlled technology when it comes to deemed exports (transfers of controlled technology within the U.S.) What are the more substantive changes that need a more careful read?

There are multiple substantive changes encompassed by these two proposed rulings. Six of them are highlighted below.

Subject to the EAR. This relates to Part 743.3 in the EAR and Part 120.6 in the ITAR. There are new types of transactions that are spelled out as "not subject to the EAR." The concept of "fundamental research," educational material, and granted patents/patent applications are formally captured here under the proposed rules.

Technology. This relates to Part 772.1 of the EAR (and Part 120.10 of the ITAR for the comparable, but not identical, term "technical data.") There is a "catch and release" approach to the proposed definition, similar to that of the "specially designed" definition that was previous introduced; section (a) spells out what is covered and (b) spells out what is not covered.

Required. This relates to Part 772.1 in the EAR and 120.46 in the ITAR. An important section to understand covers the phrase "peculiarly responsible." This also adopts a catch and release format.

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Latest Happenings with the U.S. Export Control Reform Initiative *Continued*...

The Department of Commerce has indicated that the objective of this revision is to ensure that, moving forward with a final ruling, "technology" associated with an item falls under the same jurisdiction as the item itself.

Export. This relates to Part 734.13 (EAR) and Part 120.17 (ITAR). A key change is around incorporating the transfer of decryption keys/access codes/passwords (and the like) into the definition of an export. Essentially, providing the means of accessing technical data in clear text counts as an export.

Release. This relates to Part 734.15 in the EAR and Part 120.50 in the ITAR. The proposed changes clarify how visual inspection (think: site tour by visitors) is considered a "release" of technology.

Not an export/re-export/transfer: For the first time, the regulations would more cleanly carve out certain circumstances that are not considered an export, re-export, or retransfer by BIS and DDTC. This relates to Part 734.18 in the EAR and Part 120.52 in the ITAR. If the proposed changes go into effect, then sending, taking, or storing technology or software that is secured using "end-to-end encryption" would NOT be considered an export, re-export, or retransfer. There are specific details around the nature of the encryption, so exporters are advised to read that section of the rulings carefully.

What to Do Next

Even with this harmonization effort under the Reform initiative, there are still terms that will remain distinct, but related between in the EAR and ITAR. Those include, but are not limited to, published (EAR) versus public domain (ITAR), technology (EAR) versus technical data (ITAR), and the respective definitions of the term U.S. Person.

Exporters are advised to read the proposed rulings carefully as they seek to grasp the other substantive changes that affect their unique business. Consider how your company's export compliance program may need to evolve if these changes go into effect as written. Now is the time for exporters in all industries that conduct R&D internally or through third parties to carefully review and provide relevant comments to the Commerce and State Department, including suggestions on when final rulings should into effect.

OFAC

Social Media Participation Does Not Demonstrate Reasonable Care

By Rennie Alston
Chief Executive Officer
American River Group of Companies

"There are daily posts, comments, and exchanges visible to all media participants that contain misstatements of fact, biased opinions, self-promoting suggestions, and simply bad advice.

In many cases, there are no qualification credentials available to substantiate the expertise of individuals posting information on various social media platforms."

My experiences to date include many positive exchanges in networking environments, public forums, professional association meetings, executive roundtable discussions, and one-on-one dialogues. There is true value in the exchange of information from credible platforms, sources and industry professionals whose experiences themselves qualifies them for a platform to exchange.

Social media has evolved to a major platform of availability of information in various formats such as LinkedIn, Facebook, Twitter, and other various internet groups with a common interest in international trade compliance. I am a supporter of networking, information sharing, online tutorial exchanges, webcasts, and email chat groups. It is my professional opinion that the ease of access to credible information is itself a means of virtual benchmarking that has endless benefits if used carefully.

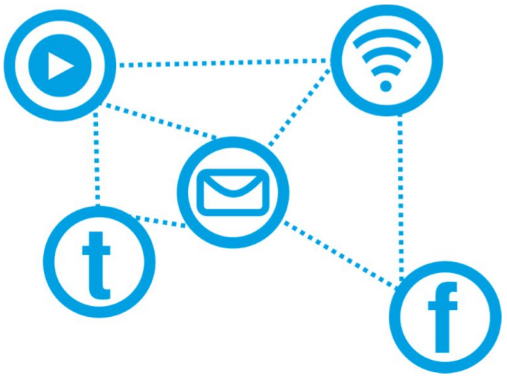
My father taught me at an early age "don't believe everything people tell you or everything you hear." If I told him something that I was told and thought to be true, he would ask "who told you that?" He said that "sometimes people like to talk and be heard, but not everyone is deserving of the stage to be heard and definitely not the microphone." He taught me to choose my conversations carefully.

I reflect to those wise words often as I read interpretations and points of views from individuals in various social media platforms designed as a value added tool for the international trade compliance industry. There are daily posts, comments and exchanges visible to all media participants that contain misstatements of fact, biased opinions, self-promoting suggestions and simply bad advice. In many cases there are no qualification credentials available to substantiate the expertise of individuals posting information on various social media platforms.

The Reasonable Care standards, published in 1993, warned us about advisory information and required importers to seek advice from industry experts such as licensed customs individuals, customs consultants, and attorneys specializing in customs law. This definition was put in place for a reason. Opinions of fact are easy to come by. Log onto LinkedIn discussion groups at any time and you can read endless opinions on various topics. At issue is: What are the qualifying factors of those individuals, some whom just like to talk or enjoy the platform and holding the microphone?

Use extreme caution when reading online information as social media participation is not a demonstration of due diligence or reasonable care. Utilize the opportunity to expand your horizons and gain access to broad opinions so that you may conduct your own due diligence and form an educated position of your own.

And, don't believe everything people tell you or everything you hear. -Harvey Alston, 1981.



ACE Opinion Statement from a Brokerage Perspective

By Gabriela Grof-Tisza
Customs Brokerage Manager
American River Brokerage Services Ltd.

The time has come and there's no turning back! ACE transition is in full effect and whether you are a small-sized broker or a corporate giant, ACE is affecting your daily operations.

U.S. Custom has been taking steps in their efforts to keep the trade informed of the changes that are happening on an almost daily basis. One of the best tools you can use for staying current with announcements of ACE production deployments or outages in services is by subscribing to the Cargo System Messaging Service (CSMS). Here, you can search by topics or search all messages and you will see a list by date and CSMS number with a full explanation in the message as to what will occur. Customs provides alerts to its users of system outage notifications so you will be aware of a problem and that steps are being taken to resolve them. These messages minimize calls into your software provider's help desk or to your ABI Reps.

The first set of PGA's to be operational in ACE are Animal and Plant Health Inspection Service (APHIS) for Lacey Act and the National Highway Traffic Safety Administration (NHTSA) (unless paired with other PGA data). Of particular interest are filing entry types in ACE such 23, 51, 52 in addition to the 01, 11 and 03 entry types. Over this summer there will be ongoing releases of these additional entry types and PGAs for processing entry summaries and obtaining cargo releases in ACE.

Currently, we are seeing messages that come back from Customs when submitting ACE entries that are more descriptive. For example, the new "One USG" message, or One United States Government, indicates that all data elements required for entry have been submitted, that all participating government regulated products have been issued a "may proceed" and that CBP has conditionally released the shipment.

Another benefit found within ACE is the split-shipment messaging response produced for an entry now built to reflect an automatic customs release on each part of the split upon arrival without the need to contact Customs at the port and request for them to post the release to each part. This used to be time consuming and difficult at times especially when you were trying to find the correct phone number for the port.

Census warnings are now accepted via ACE and the process has become much easier than producing the physical entry documents along with the ACE rejection cover letter which after so many years is probably printing crooked and misaligned as recently enabled Document Imaging System (DIS) allows documents to be viewed electronically and warning responses to be communicated through ACE. CONTINUED ON PAGE 8

ACE Opinion Statement from a Brokerage Perspective *Continued*...

The trickiest new function for me has been submitting documents via email to DIS. I preferred obtaining the Action ID number and logging into my ace portal and uploading documents that way. However, once I got the format down, it went smoothly. Depending on your software provider, the DIS documents may be directly from the entry creating an almost seamless paperless process.

One of the most significant new functions to show improvement is the processing for brokers of ACE entries that are subject to single entry bond/E-Bond. The days of preparing entry documents in a folder and sending them out to your local customs office hoping they would not get lost or overlooked are over! You can obtain a paperless release just as with any importer holding a continuous bond. It is cost-efficient and time-effective.

Although there are various challenges that are being worked on with customs, programmers, and the trade community, there definitely has been a lot of progress made with more to come. I recommend you stay informed, participate in the new program functionalities as they become available and keep your clients informed as to your progress. There still is a long road ahead, and it will be a bumpy one but the end is in sight.

HTS Classification Best Practices and Management

By Jodi Ader
Customs Consultant
American River Group of Companies

When I first started working for a company nearly 20 years ago, one of my responsibilities was assigning HTS codes to all of its products. It was a large company with presence in 35 countries and diverse businesses, but for some reason, nearly every one of its 10,000 items was classified as only one of two HTS numbers. Clearly, pigment additives, minerals, precious metals, and ozone convertors were very different and should have had different HTS numbers. I knew I had my work cut out for me!

In order to manage your HTS codes effectively, you must establish procedures and a classification database. You must also establish a means of communicating the data internally and externally with your Customs brokers and suppliers. You must audit your brokers' work to ensure accuracy. Finally, you must review your classifications at least annually to ensure your information is current.

Procedure Development

Before determining HTS classifications, you need to have a classification procedure that assigns ownership to the process. It is best to have either one person or a team reporting to a process owner responsible for the classifications. The procedure should include a policy statement that stipulates that people not specifically part of the classification team may not determine the HTS. The process owner and classification team must all have comprehensive HTS training. The procedure and company policy must be communicated throughout your organization so it can be followed.

Classification Database

Once the procedure is in place, you should create a product database that lists all products you are importing and exporting. It should be a live document that includes classifications and revisions of new and existing products. You will need technical specifications of the products (including composition and use) in order to make your determination. Chances are you will need help from your internal technical staff, or in many cases, your supplier, to give you the information you need. Using a current copy of the tariff schedule, Customs rulings (CROSS), and other resources such as Explanatory Notes, you can determine the HTS number.

If you're unable to determine the classification yourself, you should engage a Customs expert like a Customs broker, consultant, or attorney. When all else fails, you can apply to Customs for a binding ruling. Once you determine the classification, you should add the HTS number and justification for classification, including references to binding rulings, to your database. The database should be used internally and should also be provided to your Customs brokers to ensure uniformity. If you have an item master file in an ERP system, you should also add the HTS codes there. Since it is likely you will make updates gradually, you need to communicate the changes as you make them.

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HTS Classification Best Practices and Management *Continued*...

Communication

All people directly involved in the importation of merchandise must communicate the classification for the relevant item to the foreign vendor to include on the commercial invoice. By doing so, this gives the Customs broker another form of reference for applying the correct HTS number on the Customs entry. If, for some reason, something falls through the cracks and your broker receives paperwork for a shipment without an HTS code, the broker should contact whoever within your organization is responsible for classifying the item for instructions. Under no circumstance should your broker determine the HTS code on your behalf. You should audit all import entries for accuracy.

Review

Either once or twice a year, in January and July when the major tariff updates are published, you should review your classifications to make any changes. If an HTS number was simply updated, you'll need to update your database and distribute it accordingly, as well as your item master file in your ERP system. However, if you find that an HTS number changed substantially – either because the tariff rules changed or you hadn't validated the HTS yet and just found an error – you must check all import records from the date of the change to the date of discovery of the change, to ensure that Customs entries during that time period reflected the correct HTS number. If you find that the Customs entries in question do not reflect the correct HTS number, you must make the appropriate disclosure to Customs. As always, you must keep an audit trail to document any updates.

Like in my case, if you have a large amount of items to classify, classifying your items will take quite a bit of time. Whatever the magnitude may be, as long as you have documented procedures, a classification database, a system of communication, and a process to review classifications on a regular basis, you will be operating in a way that exemplifies best practices in managing your HTS classification process.

TCJ's 'Ask the Experts' team – Sarah Reynolds, Senior Consulting Associate, Jasmin Marin, Compliance Manager and Rennie Alston, CEO from American River Group of Companies– answer readers' import or export related questions. Readers may submit questions to nlopez@americanrivergroup.com.
This month's column is being answered by Rennie Alston.

Question 1: How do I obtain the status into the Broker Known Importer Program as an importer of record? What are the benefits?

Answer: The BKIP program is a trusted trader program designed to reward compliant importers for their internal work in the development of compliant procedures and processes. There is no application process to get BKIP status like traditional trusted trader programs such as ISA and C-TPAT. The BKIP program places the responsibility on the Customs Broker of Record to certify an importer as having compliant procedures and controls in place that indicates supervision, control, and compliance awareness. The Broker flags an entry with the BKIP status after having conducted an assessment of the importers known compliance controls and certifies in the entry transmission that the importer is knowledgeable.

A validation of the compliance controls is necessary either by the brokerage compliance licensed persons in charge or outside third party consultants to affirm the compliance status of the company to the broker.

The benefits of BKIP is the designation of trusted trader status, increased expedited entry processing times, and mitigation to fines and penalties.

Question 2: Does the exporter have any regulatory obligation to conduct internal self-assessment reviews for compliance management and reasonable care?

Answer: The USPPI has the obligation to meet the regulatory requirements of the full range and scope of their export activities, which could include various regulatory agencies such as BIS, CBP, DOC, and DOS.

Self-assessment reviews are an essential tool to ensure that gaps discovered can be addressed and placed on an improvement schedule as a corrective action to avoid costly fines and penalties. Compliance fire drills are often equated to best practices of compliant minded companies as a tool to keep management aware of risk factors and compliance amendments to ensure the protection of the company's risks remain protected.

Self-assessments are a basic concept in most company's internal controls and should be incorporated to include the international supply chain practices, inclusive of export transactions compliance management.

ace 2016
Realizing the Single Window

Mandatory Dates Overview

The mandatory dates are aligned to different filing functions for CBP's trade partners. They can be categorized by manifest filings, entry filings, entry summary filings, Partner Government Agency (PGA) filings, and remaining electronic portions of the CBP cargo process. Below, we have outlined which mandatory dates have criteria that will impact trade parties within cargo processing categories. By selecting a date, you will be taken to more details about the capabilities and filing requirements on that date.

Manifest Filings	May 1, 2015		
Entry Filings	March 31, 2016	May 28, 2016	Summer 2016
Entry Summary Filings	March 31, 2016	May 28, 2016	Summer 2016
Remaining Portions of CBP Cargo Process	October 2016		
PGA Filings	March 31, 2016	May 28, 2016	Summer 2016

2016 Course Schedule

(Additional classes can be found on our website—www.theworldacademy.com)

C-TPAT Security Program and Portal 2.0 Management (Half Day) (NEW)
June 17, Woodbridge, NJ *9 am—12 pm*
July 13, Costa Mesa, CA *9 am—12 pm*
September 21, Woodbridge, NJ *9 am—12pm*
November 8, Seattle, WA *9 am—12 pm*

Harmonized Classification, Determination and Compliance Workshop (Half Day)
August 10, Atlanta, GA *1 pm—4 pm*
October 11, Charlotte, NC *1 pm—4 pm*

ITCC workshop for Importers (Full Day) *2 YEAR PROFESSIONAL CERTIFICATION*
June 14, Woodbridge, NJ *9 am—4 pm*
July 22, Las Vegas, NV *9 am—4 pm*
August 11, Atlanta, GA *9 am—4 pm*
October 25 Phoenix, AZ *9 am—4 pm*

Contact:
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Office: 732-947-5492
Fax: 732-947-5495

ITCC workshop for Exporters (Full Day) *2 YEAR PROFESSIONAL CERTIFICATION*
June 13, Woodbridge, NJ *9 am—4 pm*
July 20, Las Vegas, NV *9 am—4 pm*
August 12, Atlanta, GA *9 am—4 pm*
October 26, Phoenix, AZ *9 am—4 pm*

Incoterms 2010 for Sales, Purchasing, and Operations Personnel (Half Day)
July 14, Costa Mesa, CA *9 am—12 pm*
October 11, Charlotte, NC *9 am— 12 pm*

Drawback Workshop (Half Day)
September 21, Woodbridge, NJ *1 pm—4 pm*
December 7, Miami, FL *1 pm—4 pm*

Importer of Record—Managing of the Customs Clearance Process (Full Day) (NEW) *ADVANCED*
June 2, Woodbridge, NJ *9 am—4 pm*
September 20, Woodbridge, NJ *9 am—4 pm*
October 12, Charlotte, NC *9 am –4 pm*
December 6, Miami, FL *9 am—4 pm*

Basic Export Operations and Regulations Workshop (Full Day)
October 13, Charlotte, NC *9 am—4 pm*
December 8, Miami, FL *9 am—4 pm*

Record Retention Management—The Road to Import Regulatory Compliance (Half Day)
June 17, Woodbridge, NJ *1 pm—4 pm*
July 13, Costa Mesa, CA *1 pm—4 pm*

2016 Webinar Schedule

(Additional webinars can be found on our website—www.theworldacademy.com)

Cost per webinar - $95.00 for one attendee - $55.00 per attendee for three or more attendees

All Webinars are 1 hour sessions
****ALL WEBINARS ARE EASTERN STANDARD TIME****

As with all The World Academy webinars, you will have access to the presenter via email and phone, if you should require such assistance after the presentation ends.

(NEW) Routed Exports Compliance Management on June 1, 2016—1:00 pm—2:00 pm EST

This webinar is designed to review the details of the AES filing process to compliment your company's export controls. Additionally, this presentation will review best practices of the management of routed export transactions.

This is an excellent opportunity for USPPIs and FPPIs to review the electronic export filing requirements to avoid costly fines and penalties. Attending this webinar serves as a best practice demonstration of export reasonable care.

(NEW) AESDirect in ACE Compliance Management on June 7, 2016—1:00 pm—2:00 pm EST

The President mandated a single window system for exports and imports and ACE is the hub to fulfill this directive. The AESDirect export filing application has migrated into the International Trade Data System's Automated Commercial Environment (ACE) which allows the ACE registrant access to a comprehensive export report.

This one hour webinar will focus on understanding the migration from AESDirect export filing application to ACE, an overview of the benefits, the registration process, and the current regulations for properly filing the EEI.

Topics to be discussed include:

- Signing up for an ACE Exporter Account
- ACE Export reports
- Mandatory Filing Requirements of the Foreign Trade Regulations 15CFRPart 30
- Filing AES for Routed Export Transactions
- USPPI and Agent Responsibilities
- Fines and Penalties for Non-Compliance

C-TPAT Re-validation Management on June 16, 2016—1:00 pm—2:00 pm EST

This Webinar will provide all C-TPAT members with a proven successful strategy to manage your next validation meeting with CBP inclusive of domestic and foreign site visits. Experience real life examples of validation preparation techniques that will ensure your tier status as a validated member. This is a valuable exchange to compliment alternative preparation that will make a positive difference in your company's ability to present evidence of implementation at your next validation meeting. This class is a must for all C-TPAT members.

Publisher: Rennie Alston ~ Editorial Staff: Jasmin Marin ~ Managing Editor: Nathalie Lopez

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