
BEFORE THE
UNITED STATES CENSUS BUREAU

Comments on “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Automated Export System (AES).”

**Docket No. 2023–20227
Dated September 19, 2023**

October 17, 2023

The National Customs Brokers and Forwarders Association of America, Inc. (“NCBFAA” or the “Association”) submits the following comments to the United States Census Bureau (“Census”) in response to Census’s Notice of Information Collection, Request for Comment (“Notice”), published in the Federal Register at 88 Fed. Reg. 64407 (Sept. 19, 2023). The Notice seeks comments on proposed and continuing information collections regarding the Automated Export System (“AES”) Program.

Pursuant to the Association’s review of the Foreign Trade Regulations (“FTR”) and current data collection requirements, NCBFAA proposes two recommendations aimed at increasing the accuracy of data collection and reducing the burden on U.S. Principal Parties in Interest (“USPPI”) and authorized agent filers.

First, the Association respectfully recommends removing the State of origin data element and directing State governments and other partner agencies to use the state reported in the USPPI address. As noted by the Notice, State governments rely on the State of origin data field “to focus activities and resources on fostering the exports of goods that originate in their States.” However, a separate data field for State of origin is unnecessary because the FTR already requires that the originating state be reported in the USPPI address data field. As such, AES reports contain duplicative information since the data fields for State of origin and USPPI address both identify where the goods began their journey to the port of export. Since the USPPI address data field captures the originating state information, the State of origin data field may be removed without impeding Census’s data collection activities.

Second, NCBFAA respectfully recommends renaming the data field for USPPI address to “freight location” to clarify the data element, reduce confusion within the trade community, and increase the accuracy of the reported address in the AES. By renaming the data field to “freight location,” Census would clearly indicate to the USPPI and its authorized filer(s) that the address information to be reported is the location where the goods began their journey to the port of export.

The Association, together with its more than 1,275 member companies, appreciates the opportunity to respond to Census’s Notice and hopes that its comments have assisted and will continue to assist Census in its efforts to assess the effectiveness of collecting data through the AES. Please do not hesitate to contact the undersigned with any questions on these comments.

Respectfully,



Jose D. Gonzalez
President
NCBFAA