



## **DETROIT CUSTOMS BROKERS & FORWARDERS ASSOCIATION**

---

June 20, 2023

Seth Renkema  
Chief, Economic Impact Analysis Branch  
U.S. Customs and Border Protection  
Office of Trade  
Regulations & Rulings  
90 K Street NE – 10<sup>th</sup> Floor  
Washington, D.C. 20229-1177  
*Email: [CBP\\_PRA@cbp.dhs.gov](mailto:CBP_PRA@cbp.dhs.gov)*

**U.S. CUSTOMS & BORDER PROTECTION**  
**DOCKET No. USCBP-1651-0022**  
**REVISION OF ENTRY COLLECTION INFORMATION**

The Detroit Customs Brokers and Forwarders Association (DCBFA) is based in Detroit, Michigan and represents over 25 local and national customs brokers in the State of Michigan. All our members are also members of the National Customs Brokers and Forwarders Association (NCBFAA).

We are writing to confirm that we fully support the detailed comments provided by the NCBFAA regarding comments on this Notice of Proposed Rulemaking, notably around efficiency, automation initiatives and avoiding duplication of efforts to the customs entry process.

“For the following reasons, we respectfully urge CBP to reconsider and withdraw its proposed revisions requiring additional data elements for the 7501.

It is crucial to consider the reasonableness of requiring the trade industry to submit redundant information. The proposed requirements include data elements that are already being provided to the Commerce Department by virtue of their licensing requirements as mentioned in the Notice. These required import license numbers are currently transmitted to CBP as a condition for release. We firmly believe that CBP has an opportunity to streamline the data collection process and retrieve all required information from relevant agencies, such as the Commerce Department. CBP enforces the laws of nearly fifty (50) government agencies, many of which have licensing or permit requirements. CBP’s proposed revision to collect license information at the time of entry represents a slippery slope wherein hundreds of other agency licensing or permit information likewise could eventually become required customs entry data elements, making the entry and clearance process much more cumbersome. This runs completely contrary to the objectives of CBP’s 21<sup>st</sup> Century Customs Framework to minimize duplicative data particularly from other government agencies.

The unnecessary duplication of data both in electronic format and through paper-based processes increases resource consumption for both the trade and Customs which also goes against Customs' green initiatives and sustainability efforts. We have previously submitted comments applauding CBP's efforts to embrace practices and policies which align with environmental sustainability goals. The collection, storage, and transmittal of data has both an economic and environmental cost for both CBP and trade. By establishing effective data sharing mechanisms, the need for redundant submissions, including country of source and cast provided in steel and aluminum licenses, could be eliminated. Moreover, it is worth noting that in cases where non-ABI transactions occur, and a steel license is required, CBP already possesses the necessary data from the paper license. Therefore, modifying the 7501 would be redundant, as the information is already accessible through the existing license documentation. We encourage CBP to explore regulatory changes to facilitate this integrated approach.

We also take note that the Notice refers to paper 7501, and we advocate that CBP should not continue to rely on the paper Form 7501 for Automated Broker Interface (ABI) entries. The paper-based approach is archaic and hinders the efficiency of importation processes. Instead, we urge CBP to continue to embrace modern technology and fully transition to electronic submission methods. This transition would significantly reduce paperwork burdens and enable faster and more accurate data exchange between importers and CBP.

In instances where additional non redundant data is deemed necessary, we strongly recommend that CBP effectuate a change in the Customs and Trade Automated Interface Requirements (CATAIR). This change should establish electronic data transmission channels, ensuring that all CBP officers have access to comprehensive information through the Automated Commercial Environment (ACE) system. By relying on electronic data, the need to modify the paper Form 7501 would be obviated, as all relevant information would be readily available through existing electronic platforms.”

In conclusion, the DCBFA respectfully urges CBP to reconsider and withdraw its Notice for additional data elements in the 7501. The data already align with Department of Commerce licensing requirements. Further, it is vital for CBP to embrace electronic data submission methods, address system inadequacies, and foster enhanced communication between relevant agencies. By doing so, we can collectively achieve a modernized importation process that prioritizes efficiency, reduces burdens on the trade industry, minimizes data duplication and aligns with the goals of automation and green initiatives.

Respectfully submitted,



Monica DeMars  
President, DCBFA

cc:

Ivana Gavroski, DCBFA Vice President  
Jamie Acker, DCBFA Secretary  
Charles Dionne, DCBFA Treasurer