

# Tradeverifyd



February 11, 2025

**OMB Number:** [1651-ONEW](#)

U.S. Customs and Border Protection  
Department of Homeland Security

**Subject:** Public Comment on Agency Information Collection Activities; New Collection of Information: Global Interoperability Standards for Trade

To Whom It May Concern,

On behalf of [Tradeverifyd](#) (formerly mesur.io), I would like to express our strong support for the U.S. Customs and Border Protection (CBP) efforts to advance trade modernization initiatives through the Global Interoperability Standards and the upcoming National Customs Automation Program (NCAP). As a company that has worked extensively with CBP, and is under contract with the [US DHS Silicon Valley Innovation Program \(SVIP\)](#) to design, develop, implement and refine these interoperability standards and tests, we are pleased to see the agency moving toward limited production testing and practical implementation.

We appreciate CBP's recognition of the critical role that technology plays in facilitating secure, efficient, and transparent trade processes. As a result of these innovations we are also proud to help our commercial clients realize cost savings and expand their business as a result of our product that implements these Global Interoperability Standards. We have also enabled our customers to proactively adopt these standards to accelerate their own conformance with CBP's roadmap. Since inception, our team has been deeply engaged in developing and deploying interoperable data solutions across multiple import sectors including industrials (steel, aluminum, etc.), agriculture, textiles, high tech, and e-commerce. We are excited about the potential for these Global Interoperability Standards to enhance data-driven decision making in customs enforcement and to improve supply chain transparency and security.

As CBP continues to expand pilot programs under the NCAP and other trade modernization initiatives, we strongly encourage the agency to reaffirm its commitment to an open, competitive market that allows any software vendor meeting the required global interoperability standards to participate. These [interoperability standards](#) were developed in part with funding from US Government (via our and others' work under [DHS SVIP](#)), and include the use of internationally recognized standards at the [IETF](#) and [W3C](#). CBP has previously conveyed that all companies that have implemented these standards—and successfully passed required interoperability tests—would be eligible to participate in future pilot programs. Ensuring this remains the case will help maintain trust in the process, encourage broader industry investment, and promote the original intent of fostering a dynamic and competitive trade technology ecosystem.

We urge CBP to ensure that future Federal Register Notices related to limited production NCAP rollouts across different commodity sectors remain inclusive of all qualified vendors. Additionally we recommend CBP publicly release a list of qualified vendors on its official website and publish via press release or other relevant channels to ensure the American public and importers have accurate compliance information. Such an approach will maximize innovation, enhance supply chain resiliency, and ensure that both CBP and commercial trade companies can leverage the best available technology solutions across all U.S. imports. As we know, there are several upcoming opportunities for additional NCAP rollouts and tests, and we hope that each new initiative will continue to reflect a transparent, competitive, and standards-based approach to trade facilitation.

Tradeverifyd remains committed to supporting CBP and the broader trade community in the successful deployment of these Global Interoperability Standards and other trade modernization efforts. We appreciate the opportunity to provide feedback and look forward to continued collaboration to strengthen global trade interoperability.

Thank you for your consideration.

Sincerely,



**Karyl Fowler**  
Chief Policy Officer