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March 23, 2011

Diana Hynek  
Departmental Paperwork Clearance Officer  
Department of Commerce, Room 6616  
14<sup>th</sup> and Constitution Avenue, NW  
Washington, DC 20230

RE: Proposed Information Collection; Comment Request; Automated Export System (AES) Program

Comments:

Weyerhaeuser NR Company is a forest products company with a significant volume of export shipments to multiple countries.

The proposed change states, ***"For shipments where the method of transportation is containerized vessel cargo, the container number will now be required to be reported in the equipment number field."*** The Federal Register also states that, ***"only 19% of AES records filed are reported as containerized and that 'individually', completing these conditional fields will not affect respondent burden significantly."*** In the case of Weyerhaeuser NR Company, this change of data element will affect 99% of our more than 20,000 annual export shipments.

Currently, we find it difficult to get timely assignment and acknowledgment of container numbers from our carriers, even when filing under Option 4. We are concerned that changing this data element from conditional to required may impact our ability to file our AES accurately and on time, especially under the new post departure filing requirements. At minimum, it will likely cause us to file our AES and then revise it later if the carrier information changes. This proposed change could result in substantial rework for our export documentation teams. We anticipate it will be very difficult to influence the timeliness of receiving the necessary information from our third party carriers, and this change will make our reporting requirements significantly more cumbersome. We ask you to consider keeping equipment number as a conditional data element for AES reporting.

Please contact Weyerhaeuser's Customs Manager, Sherry Hellenkamp, if there are any questions.

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Sincerely,



Tracie Higley  
Asst. Tax Director, Weyerhaeuser NR Company

