



October 10, 2012

Office of Management and Budget
Office of Information and Regulatory Affairs
Attention: OMB Desk Officer for Customs and Border Protection, Department of Homeland Security
Washington, DC
Sent via electronic mail to: oir_submission@omb.eop.gov

RE: U.S. Customs and Border Protection (CBP) of the Department of Homeland Security and the Agency Information Collection Activities: Importer of ID Input Record – 30 Day Notice and Request for Comments: Extension of an Existing Collection of Information. Federal Register (76 FR 37696) on June 22, 2012, allowing for 60-day comment period – in accordance with 5 CFR 1320.10.

Title: Importer ID Input Record

OMB Number: 1651-0064

Form Number: CBP Forms 5106

Dear Sir or Madam:

Dun & Bradstreet (D&B) Government Solutions, a global provider of information on some 219 million businesses, appreciates the opportunity to comment on Customs & Border Protection's (CBP) "Agency Information Collection Activities: Importer ID Input Record."

For over 170 years D&B has been the leading source of commercial information and insight. Our solutions support nearly every U.S. Federal Government Department and independent agency, including CBP, in addition to a worldwide customer base of some 250,000 organizations. The recommendations included in this document are based on a set of best practices drawn from our experiences with public and commercial sector customers around the world.

Specifically, we believe that our corporate core competencies and well-developed best practices uniquely qualify us to provide CBP, as well as the Office of Management and Budget (OMB), with ideas and feedback regarding the extension of this existing collection of information. In particular, after reviewing the five areas that were suggested for comments, D&B sees the following three areas as ones where our many years in business, specifically in the business of collection data on organizations, qualifies us to provide a unique perspective.

The comments should address:

- (c) ways to enhance the quality, utility, and clarity of the information to be collected;
- (d) ways to minimize the burden including the use of automated collection techniques or the use of other forms of information technology; and



(e) the annual costs burden to respondents or record keepers from the collection of information (a total capital/startup costs and operations and maintenance costs).

1. Ways to enhance the quality, utility, and clarity of the information collected.

The core of D&B's business is the collection, maintenance and dissemination of information on commercial enterprises. This process is one that has been honed over the course of many years. In fact, the process of data collection is so critical to our way of business that we have patented the process for not only collecting the data, but also maintaining it. We call this process the DUNSRight Quality Process and it underpins all of the work that we do on behalf and in support of our clients.

Over the course of collecting and maintaining data for the better part of 170 years, we have tested, tried and modified just about every conceivable way to gather data from businesses – all with an eye of outputting and delivering to our clients the highest quality and most useful business data available on the commercial market today. This background serves as context in establishing the fact that D&B is truly a subject matter expert when it comes to the collection of information on businesses.

Consequently, we firmly believe that CBP and OMB should look to the commercial world for advice and perhaps even services to make this government-run procedure of getting an Importer ID Input Record run more efficiently and effectively, all the while reducing the burden on industry and making the whole endeavor less cumbersome. We have several ideas to support CBP's collection of high-quality information through this process.

First and foremost, in any data collection process it is critically important to employ upfront data validation procedures to insure that the data flowing into the system of record is of the highest quality. As a point of reference, D&B validates its own data by following a rigorous Quality Assurance process. This includes over 2,000 separate, automated and manual checks designed to maximize the integrity of our data before it is loaded into our system.

These automated edits, imposed by the D&B systems that collect and maintain our global data repository, range in complexity from simple, straightforward field validations, to complex algorithms that rely on the information captured in our worldwide database to establish normative values against which to compare collected information. The following is a short list of examples used by D&B within our own process and would be validations suggested for use by CBP as well:

- Initially validating the legitimate existence of the submitting business
- Identifying whether a business phone is a land line or a cellular phone (higher fraud instance)
- Validating that the city and state match the postal code
- Flagging those entities not present in a comprehensive referential database for further review
- Validating the business name is appropriate for the line of business (“AI’s Auto Body” with an SIC Code of “Medical Supplies” would raise a flag)
- Validating the street address against postal databases, including the National Change of Address (NCOA) database
- Assignment of a persistent key that links corporate family hierarchies and makes it possible to append additional demographic, contact and predictive information



CBP could create these validations themselves; however, a more efficient and perhaps more effective process might involve the use of a high-quality, comprehensive commercial database to validate against during the registrant's data entry process. Ultimately, we believe leveraging commercial best practices to build this type of validation process would make the most sense for CBP.

2. Ways to minimize the burden including the use of automated collection techniques or the use of other forms of information technology; and

D&B keenly understands both the art and the science of collecting data – on hundreds of millions of companies. One of the most significant tenants of collecting this type of information is to make it as easy as possible on the subjects not only on the front-end, but also on an ongoing basis. Thus, where possible, we will provide what is already known about a business to that entity, requesting that they update those data elements first before proceeding with any additional data requests/submissions. Therefore, one significant recommendation to CBP and OMB would be to match any input (Business Name, FEIN/IOR#, DUNS or Name/Address) to a referential database and provide standardized, known business location back to the registrant to confirm or modify. This same process can be used in an annual (or other interval) update request to the registrant to verify continuing presence and correct, current information in the registrant profile.

In other words, the government could receive whatever input the registrant would prefer to use – which is in turn would prompt an auto-population of a significant portion of the remaining fields – including business name, I.R.S Number, DBA (tradestyle) business name, street and mailing address, city, state, zip code, country code, telephone number, type of location (corporation, partnership, sole proprietorship, US Government, State/Local Government and Foreign Government) and CEO (most senior person) name and title. With these fields completed, the registrant is now simply checking the accuracy of this information and completed the Form 5106 with any additionally required fields/data requests – such as a Social Security Number, CBP-Assigned Number and/or whether or not they have ever been assigned a CBP Importer Number before.

The benefit of this standardized data is fewer data entry mistakes and ease of use for the customer. It also provides the ability to tailor the data provided to CBP's needs. For example, if a branch location's address is provided, the process can provide a prompt – “You've selected a branch location, while IOR data is recorded at the business headquarters level. We show the HQ as X, is this the correct location to associate with your registration?”

3. The annual costs burden to respondents or record keepers from the collection of information (a total capital/startup costs and operations and maintenance costs).

D&B's perspective on the costs associated with this type of data collection process is that the upfront collection of data is the least expensive and typically eases from an operational point of view. The more significant costs and harder work come from the upkeep and maintenance of this data over time. Additionally, it is far more cost-effective to prevent data issues upfront than to try to resolve them later. Typically, the costs and work associated with creating a web-based registration system are fairly straight-forward. However, once you are charged with the upkeep of these same data elements, you quickly realize the difficulty is associated with maintenance of the information.



A great example of the dynamic nature of a global business database is illustrated by looking at our database and its frequency of change -- based on our database activity, every 60 minutes in our U.S. system:

- 290 businesses will have a suit, lien or judgment filed against them
- 86 business telephone numbers will change or be disconnected
- 57 business addresses will change
- 91 directorship (CEO, CFO, etc.) changes will occur
- 78 new businesses will open their doors
- 2 companies will change their names
- 12 businesses will file for bankruptcy

With an understanding that the burdens of maintaining a large database of entities can be significant, the business case to off-load a portion of this burden and rely upon commercial best practices to source the requisite data and to keep it current is compelling. CBP should strongly consider the use of an off-the-shelf solution to identify Importers of Record and perhaps consider the introduction of a commercially accepted standard for business ID. The proven COTS choice in this situation is D&B and the D-U-N-S Number, which has been used within the federal procurement data system for well over 30 years.

Thank you for the opportunity to comment on the proposed regulation. D&B is a long-time partner to CBP, the Department of Homeland Security as well as the entire Federal Government for mission-critical data services that support the Nation's security, while streamlining the legitimate flow of trade within the United States as well as around the world.

Sincerely,

Michael Caskin

Michael P. Caskin, Director of Business Development
Global Trade Management Practice