

September 5, 2007

U.S. Customs and Border Protection Information Services Group -- Room 3.2C 1300 Pennsylvania Avenue NW Washington, DC 20229

RE: Comments - Paperwork Reduction Act - Importation Bond Structure

Dear Sir or Madam,

These comments are prepared based on the July 12, 2007, Federal Register notice [72 FR 38094] concerning the form CBP-301, more commonly known as the Customs Bond. Roanoke Trade Services an insurance broker that specializes in providing insurance products for the international trade community, including Customs bonds. The surety companies we represent are the underwriters for in excess of 200,000 bonds each year.

The Customs bond requires the signature of the surety company's agent, and that agent must also disclose his Identification Number. This number facilitates the verification by CBP of the agent's authority to bind the surety, based on a previously filed power of attorney form CBP-5297. Currently CBP regulations [19 CFR 113.27(g)(1)(ii)] stipulate that this identification number is the social security number of the surety agent. Typically, the bond is executed in such a manner that it is a 3-part document so that CBP, the bond principal, and the surety all have a copy of the bond. This identification number usually appears on all copies. Further, a bond copy may be the subject of FOIA requests or appear as an exhibit or appendix to public records such as court filings, where such disclosure may not conceal the identification number.

In an age of an increasing frequency of identity theft, it might be prudent that CBP transition from a policy that the identification number be the social security number of the agent and adopt a policy that CBP assign a unique identification number to an individual that desires to be a surety's attorney in fact. This would be similar to how CBP assigns foreign corporations and individuals a "Customs Assigned" importer number; CBP would still have a unique number against which it can confirm POA authority, and personal information such as the surety agent's social security number would not be visible to the general public.

We recognize that this request may be beyond the scope of the Federal Register notice for comments since it implementing our recommendation would involve a change to CBP regulations and the form CBP 5297. However, we did want to be on record by bringing it to CBP's attention. Thank you for the opportunity to provide comment. The company of the particle of the verification of the particle of the verification of the particle of the sound of the particle of the

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