



Comments of the
Semiconductor Industry Association (SIA)
On
Agency Information Collection Activities:
Importer ID Input Record
79 Fed. Reg. 61091 (October 9, 2014)

December 3, 2014

Tracey Denning
Customs and Border Protection
Regulations and Rulings
Office of International Trade
90 K St. NE, 10th Floor
Washington, DC 20229

The Semiconductor Industry Association (SIA), the voice of the U.S. semiconductor industry,¹ appreciates the opportunity to submit comments on U.S. Customs and Border Protection's (CBP's) proposal to revision of an existing collection of information. Semiconductor innovations form the foundation of America's \$1.1 trillion technology industry affecting a U.S. workforce of nearly 6 million.

Founded in 1977 by five microelectronics pioneers, SIA unites both manufacturers and designers, accounting for over 80 percent of U.S. semiconductor production. SIA seeks to strengthen U.S. leadership of semiconductor design and manufacturing by working with Congress, the Administration and other key industry groups to promote policies and regulations that fuel innovation, propel business and drive international competition in order to maintain a thriving semiconductor industry in the United States.

CBP invited public comments on proposed CBP revisions to Form 5106, "by gathering additional information about the company and its officers. This will enhance CBP's ability to make an informative assessment of risk prior to the initial importation and will provide CBP with improved awareness regarding the company and its officers who have chosen to conduct business with CBP." The notice continues that, "this detailed information will provide CBP with a greater knowledge about the company and its' previous business practices." CBP seeks comments addressing, "(w)hether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility".

SIA believes nearly all the additional information to be requested in Form 5106 has already been submitted to other government agencies. CBP should coordinate with those agencies to obtain this additional information and not burden companies to re-state it to CBP. Since this information is already known to several other federal agencies, SIA does not believe that CBP collection of the information is necessary for its proper performance. At a minimum, SIA would propose that the social security

¹ Additional information on SIA is available at www.semiconductors.org.



SIA

SEMICONDUCTOR
INDUSTRY
ASSOCIATION

numbers of corporate officers should not be required, as this poses a security risk to the individuals.

Finally, if these changes are based on assessment of risk, companies that are members of the Customs-Trade Partnership Against Terrorism (C-TPAT) should be exempted from sending this additional information to CBP.

SIA appreciates CBP's consideration of our views, and we look forward to continuing to work with CBP to strike an appropriate balance in the collection of information for Importer ID Input Records.