



AMERICAN PETROLEUM INSTITUTE

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Office of International Trade
U.S. Customs and Border Protection
90 K Street NE
Washington, DC 20229-17

ATTN: Tracey Denning, Regulations and Rulings

Re: Agency Information Collection Activities: Importer ID Input Record
OMB No.: 16651-0064
Form No.: 5106

Dear Ms. Denning,

The American Petroleum Institute (API), on behalf of its members, submit the following comments concerning U.S. Customs and Border Protection's (CBP) request for comments on the Agency Information Collection Activities: Importer ID Input Record published in the Federal Register, 79 Fed. Reg. 61091, on October 9, 2014.

API is a national trade organization representing over 600 companies involved in all aspects of the domestic and international oil and natural gas industry, including exploration, production, refining, marketing, distribution and marine activities. The API member companies participate in an industry that is essential to the economic health of the United States and a vital part of U.S. trade. While we understand CBP's security and protection mission, we do not believe that the proposed collection of information would be necessary or have practical utility and may compromise CBP's other objective of supporting trade.

The breadth of excessive information gathering proposed in Form 5106, does not bear any significant value to the validation and security process for participating entities. For example, Social Security numbers, Passport numbers, and bank account information of Officers are not pertinent to validating entities that already possess tax identification numbers or other identifying marks that differentiate them from one another. We recognize that other commenters, specifically the American Association of Exporters & Importers, have focused on this issue in more detail and we lend our voice to their concerns.

We would note that in the limited instances where an Importer ID Form is submitted by either (a) non-resident entity that is not a known importer with an acceptable compliance history; or (b) a new or privately-held entity that is not a subsidiary or affiliate of a publically - traded resident company or of a known importer with an acceptable compliance history, it may be appropriate for CBP to require that entity to complete applicable relevant portions of Section 3 of the proposed Form 5106 for further inquiry and risk assessment of the company.

Based on these concerns, API has strong concerns with the proposed revision of CBP Form 5106.

Should you have any questions or wish to discuss our comments further, please do not hesitate to contact me at 202-682-8264 or FlickingerM@api.org.

A handwritten signature in black ink, appearing to read 'Michael Flickinger', with a long horizontal flourish extending to the right.

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