

❖ AAEI American Association of Exporters and Importers  
*The Voice of the International Trade Community Since 1921*

April 29, 2008

Ms. Tracey Denning  
U.S. Customs & Border Protection  
1300 Pennsylvania Ave., NW, Room 3.2.C  
Washington D.C. 20229

Re: Comments in response to the Proposed Collection and Comment Request  
FR Doc 1651-0075  
Proposed Collection; Comment Request; Drawback Process Regulations and Entry Collection Documents

Dear Ms. Denning:

On behalf of the American Association of Exporters and Importers (AAEI) and in accordance with the referenced Proposed Collection and Comment Request, the Association respectfully submits the following comments on US Customs and Border Protection's (CBP) proposed Drawback Process Regulations and Entry Collection Documents.

**AAEI Background**

AAEI has been a national voice for the international trade community in the United States since 1921. Our unique role in representing the trade community is driven by our broad base of members, including manufacturers, importers, exporters, wholesalers, retailers and service providers including brokers, freight forwarders, trade advisors, insurers, security providers, transportation interests and ports. Many of these enterprises are small businesses seeking to export to foreign markets. With promotion of fair and open trade policy and practice at its core, AA EI speaks to international trade, supply chain, security export controls, non-tariff barriers, import safety and customs and border protection issues covering the expanse of legal, technical and policy-driven concerns.

**Drawback Process Regulations and Entry Collection Documents Comments**

With respect to the Drawback Process Regulations and Entry Collection Documents comment request, AA EI would like to submit the following comments:

1. For the CBP Form 7551 (Drawback Entry), with the change noted in the comments below regarding request to add the boxes for the HMT claimed amount, we submit the suggestion that the "CBP Form 7551 Instructions" document will require edits to incorporate the addition of the boxes for the HMT claimed amount.
2. For the CBP Form 7552 (Delivery Certificate For Purposes of Drawback), we request the following change to Page 2 in the Declarations Section, Second Statement:

The current language reads: The merchandise transferred on this CD is pursuant to 19 U.S.C. 13130)(2) and will not be designated for any other Drawback purposes.

The language should read: The merchandise transferred on this CD is pursuant to 19 U.S.C. 1313(J)(2) and will not be designated for any other Drawback purposes.

3. For the CBP Form 7552 (Delivery Certificate for Purposes of Drawback), we would also request the following change to Page 2, Box 30: add box for exhibit of Harbor Maintenance Fee.
4. For the "CBP Form 7552 Instructions" document, edits may need to be made to correspond to the change in Form 7552 requested above.

We thank you for considering these comments, and look forward to working with you to further these changes. Please do not hesitate to contact us at [hnorthcott@aaei.org](mailto:hnorthcott@aaei.org) or (202) 857-8009.

Respectfully Submitted,



Hallock Northcott  
President and CEO  
American Association of Exporters and Importers

CC: Randi Heuser, co-chair of AAEI's Drawback and Duty Deferral Committee  
Edwin Van Ek, co-chair of AAEI's Drawback and Duty Deferral Committee