

❖ AA EI American Association of Exporters and Importers
The Voice of the International Trade Community Since 1921

May 9, 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.

Please accept this letter as an additional comment from the letter that we sent you on April 29, 2008 (see attached.)

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, AAEI 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, AAEI would like to submit the following comments:

CBD Form 7553 (Notice of Intent to Export, Destroy or return Merchandise for Drawback Purposes)

The instructions for the completion of CBP Form 7553 that are available on the Customs website do not follow the CBF Form 7553 currently on the website, and therefore need to be updated.

Box 2. Drawback Entry No. – this is very confusing since the form is not requiring an actual drawback entry number as is required on CBP Form 7551, but rather a document reference number. The term “Drawback Entry Number” should not be used in this context since it has a very precise meaning as used on the CBP Form 7551.

Box 7. Location of Merchandise – the location of the merchandise prior to exportation or destruction is irrelevant. If Customs notifies the claimant that they wish to examine the merchandise prior to exportation, then arrangements are made to determine the time *and place* of examination. If the merchandise is to be destroyed, then that information is indicated in Box 8. Where the merchandise is located at the time of the preparation of the form is immaterial.

Box 8. Method of Destruction/Location – this should be split into 2 boxes; one describing the method of destruction, and one giving the location of the intended destruction.

The current form is confusing in that it appears to request much of the information required by a drawback entry (CBP Form 7551), even though this Notice of Intent form is prepared and filed long before a claim is prepared. There should be no need to indicate the Import Entry Number (box 14), the drawback amount being claimed (box 16) on the CBP Form 7553 and these boxes should therefore be deleted.

Box 19. Drawback to be filed as - this should not be required, since a claimant may not know at the time of export which type of drawback is ultimately going to be claimed. The form’s use is only to advise Customs of the intent to export or destroy merchandise to be claimed for drawback – the type of drawback being claimed will be indicated on the CBP Form 7551 when it is filed, and is immaterial at the time of exportation or destruction when the CBP Form 7553 is filed.

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 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

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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 or (202) 857-8009.

Respectfully Submitted,



Hallock Northcott
President and CEO
American Association of Exporters and Importers

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