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To: CBP Paperwork Reduction Act Officer  
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Office of Trade, Regulations and Rulings  
Economic Impact Analysis Branch  
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Washington DC 20229-1177

Date: Aug 23, 2017

Ref: OMB Control number 1651-0001

To whom it may concern,

Riley-Sherman Shipping Agency, Inc (hereinafter "RSSA") would like to submit the below comments in response to FRN (Vol. 51, No 33) dated August 16, 2017 "Notice and Request for Comments" in regards to the Electronic Ocean Export Manifest Burden Hours (FRN Chart dated July 28, 2017).

RSSA would like to officially object to the declared burden time estimated for the Electronic Ocean Export Manifest. The FRN has reported a burden time of only 1.5 minutes which is heavily underestimated.

Our company has been filing Ocean Export Manifests as part of the Pilot program for the past 13 months (since July 25, 2016). To date, we have filed 34 manifests total, under 15 different voyages. It has been our experience over the past year, that the Export Manifest is very similar to AMS (inbound) except that additional data elements are required (ie: ITN numbers and possibly the Country of Ultimate Destination to be confirmed). Also, extra time is now needed to obtain the information 24 hours prior to loading. This channel of communication did not previously exist, as the Carrier was only receiving most of the manifest details once the Bill of Lading was issued after the vessel sailed. However, in order to file 24 hours prior to vessel loading, there now must a new line of communication between the Carrier, Voyage Charterer, Ship Broker and the Exporter (and/or their filer).

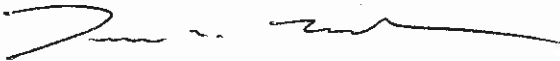
With the extra data elements that are required and the new line of communications that must take place, the Ocean Export Manifest is definitely taking a significantly greater amount of time to process than we have experienced on the AMS side (Inward Cargo Declaration) over the last 13 years of providing AMS services to our clients.

The same FRN has declared a burden time of 30 minutes for Inward Cargo Declaration (CBP Form 1302 – AMS) compared to only 1.5 minutes for the Export Manifest. In our opinion, the total burden hours for an Ocean Export Manifest submission should be greater than the 30 minutes burden time on the Inward Cargo Declaration side, possibly as high as 40 minutes.

RSSA would like to request that CBP review the required data elements and coding documentation (ie: CAMIR) for the Ocean Export Manifest and the Inward Cargo Declaration to compare the differences. You will most likely find that no part of the process or required data elements of the Ocean Export Manifest is any less than an AMS (Inward Cargo Declaration) filing.

RSSA highly appreciates CBP's time and consideration in the above matter. We are available to discuss further if needed, and look forward to a revised figure for the burden hours reported for the Ocean Export Manifest filings.

Best Rgds,



Tom Lucek

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