



US Customs & Border Protection
Regulations and Rulings
Office of International Trade
90K Street NE
10th Floor
Washington DC 20229-1177
Attn. Tracey Denning
December 5, 2014

RE: comments for proposed revisions to CBP form 5106

Dear Ms. Denning,

JAS Forwarding USA Inc. is a customs broker and international freight forwarder. I would like to express the following comments in regards to the proposed revisions to the 5106 update. I believe more information is important but believe that a few of these items will be difficult to obtain as well as impeding international trade.

Collecting of SS # or passport number of an officer of a company will be extremely difficult. Identity theft is a real issue that many people are concerned about. Officers of companies work for those companies but do not normally have financial ties to the company such as ownership. The proposal is asking officers of the company to provide their SS#/passport in order to import product for their company not themselves. The SS number/passport is a person's private identity number with the government and should not be tied to the company they work for in order to import product.

If the broker is required to obtain in order to complete the 5106 the broker will then be responsible for protecting this information of personal data for the importer as well. This could be a burden to the broker as well as an issue for the officer of the company to expect the broker to keep this information confidential.

The requirement to provide a broker and broker telephone number also seems irrelevant and could change periodically. Some importers use multiple brokers for various business reasons so indicating 1 broker when they in fact may use more would be a burden.

A handwritten signature in dark ink, appearing to read 'Laurie Arnold', is written over the typed name.

Laurie Arnold
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