February 20, 2014

The Honorable Penny Pritzker U.S. Department of Commerce Washington, D.C. 20230

Dear Ms. Pritzker,

As Chairman of the Advisory Committee on Supply Chain Competitiveness (ACSCC), and on behalf of the members of the ACSCC, and this being our first correspondence to you since your confirmation, please accept our congratulations and support in your role as Secretary of Commerce.

As ACSCC members, we are pleased to offer you our recommendation on how the Federal Government should expedite implementation of an integrated, government-wide "single window" import and export data filing and border clearance system that was required by Section 405 of the SAFE Port Act of 2006. This system, formally known as the International Trade Data System (ITDS), when implemented together with its Automated Commercial Environment (ACE) user interface, will eliminate many of the filing complexities and import/export clearance delays that filers currently face when importing and exporting goods across our Nation's borders.

The Federal Government initiative to create and achieve a "single window" system began in 1995, but has been repeatedly slowed by a series of Federal reorganization, budget, and management difficulties. Expediting the completion and implementation of the "single window" will improve the competitiveness of U.S. companies and their supply chains, while protecting our national security, public health and safety, and environment and natural resources. The implementation of ACE and ITDS, together with other improvements to border processing and information infrastructures, could increase global GDP by nearly five percent (\$2.6 trillion) and global trade (in terms of exports) by 15 percent (\$1.6 trillion), according to the World Economic Forum.

The following recommendations are based on ACSCC members' experience in border processing and technology matters related to ITDS and ACE, and their participation in user community efforts to facilitate ITDS and ACE development. Also, these are based on extensive work that was done by two of our subcommittees, IT & Data and Trade and Competitiveness, which conducted interviews with key government officials and business representatives on the development of the electronic filing system in the United States and abroad, reduction of duplicative reporting efforts by agencies, and security concerns that impact the supply chains. The recommendations are offered to help ensure that the U.S. "single window" system is implemented as quickly as possible and that it meets the urgent needs of the U.S. trade community. To accomplish this goal, the Administration should:

 Create a White House-led "rapid-deployment team" to work with the Department of Homeland Security's Bureau of Customs and Border Protection (CBP) and other participating agencies to fund, complete, and implement the "single window" system by no later than December 31, 2015. This team will be co-chaired by a White House designee and a trade community expert and part of its responsibilities will include selecting three industries to pilot an integrated National Service Center of Excellence approach to manage all trade interactions with the federal government.

- A private sector technical project manager, working collaboratively with the White House and the ITDS board of directors, must be put into place. This individual must have recent and relevant private sector experience and expertise to direct and provide independent oversight of such a complex, rapid and large scale implementation.
- Conduct a rapid review of "single window" technology requirements to ensure that new technology requirements meet recent trade agreement commitments.
- Speed up the technology build-out of the ITDS and leverage rapid development methodologies, middleware to extract existing data from disparate systems, and best practices in information exchange (including lessons learned from Singapore's TradeNet system.)
- From March 15, 2014 through December 15, 2014 (during the initial 6-9 months), launch a highly targeted pilot phase aimed at developing and deploying in select sites a highly simplified ACE user interface covering a cross-section of products.
- Launch a subsequent 18-month scale-up phase to deploy ITDS as an interagency and public/private partnership model to be used across the whole trade network.

The full text of our recommendation follows.

We strongly believe that it is crucial to complete and implement the Federal Government's "single window" system in an expedited manner, in order to maintain the United States' global leadership in trade and customs matters and achieve the full interagency coordination needed to ensure that our companies will remain competitive in the global marketplace.

Thank you for your support and commitment.

Respectfully submitted,

Kil D. Blasser

Mr. Rick D. Blasgen

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