

April xx, 2015

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

Dear Ms. Pritzker,

As you may know, our Advisory Committee on Supply Chain Competitiveness (ACSCC) has been working on issues relating to the progress of the International Trade Data System, also known as the Single Window Initiative, and we wanted to make you aware of some of our concerns.

Since we provided our initial recommendation to you on this initiative, we have continued to work closely with your staff at the Commerce Department and key personnel at Customs and Border Protection (CBP), discussing the project status, related technical and strategic issues in developing the system, and updates on our IT & Data subcommittee's research on various development options of other countries' Single Window systems. We appreciate the opportunity to advise on these issues and have found our interactions valuable.

As the ITDS project enters a new phase, it will require increasingly higher levels of interagency cooperation. We believe the White House may need to intervene more aggressively across the interagency process to ensure that all of the agencies are aligned and cooperating fully with the Department of Homeland Security and Customs and Border Protection to successfully complete this system by December 2016. We also believe that the White House will need to take a more assertive role in addressing key differences among the agencies with regard to items likely to impact supply chain operational efficiency and reliability, such as agency service level (response time) standards and risk assessment criteria/rule sets, and items likely to impose additional IT and process costs on the supply chain, such as non-rationalized data elements and regulatory dissimilarities.

We strongly recommend that an industry subject matter expert with extensive prior experience in system design, development and deployment of single windows, be immediately designated to oversee the project.

We raise these concerns because this committee strongly supports CBP's and the Administration's effort to complete work on this system, and greatly appreciates the President's Executive Order to expedite it. We believe implementation of the ITDS Single Window, as quickly as possible, has the potential to significantly improve US companies' ability to export and strengthen our economy, but only if the implementation thoroughly and effectively addresses the factors listed above.

To help inform companies on the progress made with the development of the Single Window initiative, we would suggest that the White House provide a comprehensive work plan and status report by June 2015 to share the progress made, what resources are still needed, and what institutional challenges need to be addressed to make the deadline. This work plan and progress report should be followed up with a robust ITDS communication and education plan from the project team to share updates with all impacted stakeholders on a monthly or quarterly basis.

Finally, it is important to look beyond our borders. Single Windows are currently under development around the world. In support of the work and commitments entered into at the North American Leaders Summits, it is appropriate that our U.S. Single Window interoperability efforts should look first to our North American neighbors, Canada and Mexico. To date, multiple U.S. Government initiatives to simplify the movement of goods across the Canadian and Mexican borders and to strengthen the external perimeter around our three countries are underway. The ITDS Single Window must also interact as smoothly as possible with the single window systems (currently under development or at some stage of implementation) of both Canada and Mexico. Work to ensure the interoperability of the three countries' import/export control systems must begin as soon as possible in order to provide IT support for simplification/harmonization initiatives, and to reduce the cost and complexity caused by multiple required transmissions of identical data for cargo moving to and from our North American neighbors.

Thank you for your assistance to help ensure the ITDS Single Window project is completed by December 2016 and to help raise the profile of the necessity of system interoperability with our North American partners Canada and Mexico, and we look forward to continuing to work with you to make our supply chains more competitive.

Respectfully submitted,

Mr. Rick D. Blasgen  
President and CEO, Council of Supply Chain Management Professionals  
Chair, Advisory Committee on Supply Chain Competitiveness