

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

Dear Madam Secretary,

As you well know, the United States, Canada and Mexico have seen significant trade increases as regional partners since the early 1990's. Unfortunately, many companies continue to experience delays and inefficiencies in the administrative processes associated with moving their goods and services across borders. While overall trade within the North American region has risen from \$337 billion in 1993 to over \$1.2 trillion in 2013, that trade remains hampered by three individual and non-integrated border control systems that are neither harmonized nor interactive, and that require importers and exporters to go through separate approval process by a number of different agencies in each country. This expensive and slow process has been a driver for governmental modernization efforts over the last decade through prominent campaigns in North American partner countries, similar to customs and partner government agency modernization efforts in other countries around the world.

Recently, some members of our Advisory Committee on Supply Chain Competitiveness (ACSCC) have begun to participate in the regular meetings and conference calls of the Customs Operations Advisory Committee (COAC) - North American Single Window Working Group and, through this coordination, have learned of the numerous issues and difficult challenges to be addressed and overcome in the development of a Single Window across North America. We applaud the members of this working group for their expertise, their dedication to the work of establishing a North American Single Window, and the sage advice they have put forth thus far.

In addition, many members of our ACSCC are themselves representatives of the largest global companies and are impacted daily by customs challenges and complexities. Based on our ACSCC member's expertise and deep understanding of the import / export control systems, and with the goals of accelerating the development of a North American Single Window to enhance the interoperability of the U.S. Single Window with those of our Mexican and Canadian neighbors, the ACSCC puts forth the following recommendations:

- Emphasize Trusted Trader Concepts, such as C-TPAT/ISA, Compliance (trust but verify approach),
- Simplify and harmonize data sets and allow export data to be used as import data (single data set),
- Reduce redundant message sets, particularly with Partner Government Agencies,
- Require commonality/consistency of Single Window entry filing field requirements,
- Truly harmonize and agree on NAFTA entry treatment and standard document/data required,
- Reduce "data creep" (Consumer Product Safety Commission's proposed data requirements are a good example of new data being requested by the federal government for targeting and enforcement purposes, and CPSC' request for new information under its General Certificate of Conformity pilot is another example of this),
- Focus on policy, but also the technical and systematics changes necessary to comply with any new proposals (process mapping),
- Improve agent training on various border crossing issues causing delays and undue

hardships,

- Streamline communication from Vendor →Broker →Customs,
- Create a single-harmonized glossary of data elements amongst all governments and the PGAs within each government,
- Create commonality of field requirements for each country,
- Harmonize all PGA flags at the tariff level.

Supporting these recommendations will help move the U.S.' International Trade Data System, also known as the Single Window Initiative, forward, and help ensure the interoperability of the U.S., Mexican and Canadian Single Window import/export control systems. In particular, these changes will help provide IT support for simplification/harmonization initiatives to reduce the cost and complexity caused by multiple required transmissions of not-quite-identical data for cargo moving to and from the U.S. and our North American partners. Our committee members believe that these recommendations need to become a reality.

While detailed and technical, these recommendations, if implemented, will directly and positively impact the commerce and trade of all three North American nations, and are critical to our nation's, and the North American continent's, economic health and global competitiveness.

Additionally, we are resubmitting, as an attachment, the white paper produced by our Council in 2015 - *Trade Automation and the North American Trade Portal* - for your review and background information on the importance and benefits of a North American Single Window.

Again, we thank you for your leadership and assistance to help ensure the ITDS Single Window project is completed by December 2016 and to ensure its system interoperability with our North American partners, Canada and Mexico in the most timely manner. We look forward to continuing to work with you to make our supply chains more competitive.

Respectfully submitted,

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