

## **C-TPAT Best Practices - Entry Level Data Submission**

In April 2005, Mr. Robert Bonner, Commissioner of U.S. Customs and Border Protection, addressed C-TPAT members at the Supply Chain Security Conference held in Miami, Florida. Mr. Bonner noted that C-TPAT was intended to be a dynamic program designed to evolve to a higher level of supply chain security, and in exchange, increased benefits would be afforded to companies that invest and adopt C-TPAT security criteria. During his address, Mr. Bonner outlined a new tiered benefits structure for certified importers which would reward companies that have met or exceeded minimum security criteria by adopting best practices.

Tier One would consist of certified importers and afford meaningful reduced inspection benefits. Tier Two would consist of validated C-TPAT importers meeting minimum security criteria and would grant greater examination reductions than Tier One. The top level of benefits, Tier Three, would consist of those validated C-TPAT importers, who exceed the minimum security criteria and have adopted C-TPAT best practices.

Security measure identified as "best practices" by CBP include, but are not limited to, requiring the adoption of C-TPAT security measures throughout a company's entire international supply chain(s) through contractual means; active involvement in the security enhancement process by senior company leaders/management; use of GPS tracking devices, particularly in the trucking environment; security escorts of trucks to the border/port, in high risk environments; perimeter fencing with magnetic sensors that activate if pressure is applied against the fence; measuring empty trailers/containers prior to stuffing to identify false walls, ceilings, etc.; multi-level, encrypted IT security systems which restrict employees' access to only certain information based on their job description; criminal background checks on all employees, to the extent permitted by foreign laws/regulations; screening procedures for new clients, suppliers, manufacturers, etc., which go beyond financial stability measures to include security related indicators; use of container sealing devices which exceed the current minimum PAS ISO 17712 standards, for example, the use of cable seals around the "J" bars or "sea lock" devices; and the use of container security device technologies (as these technologies become more reliable and commercially available).

An additional measure identified as a "best practice" by CBP and immediately available to all importers involves the electronic transmission of entry level import data. To fully realize the reduced cargo inspection benefits afforded certified C-TPAT importers, entry level data should be transmitted to CBP as early in the importation process as possible, preferably prior to loading the cargo foreign (at the 24 Hour Rule timeline). Currently, carriers are required to submit manifest level data to CBP 24 hours prior to loading the cargo in the foreign port. However, entry level data, which is more detailed than manifest data and generally submitted by importers or their brokers prior to the vessel's arrival in port, may also be submitted much earlier in the process, at the 24 hour prior to loading timeframe.

Adopting this "best practice" further reduces the importer's likelihood of being subjected to a cargo examination at a Container

Security Initiative (CSI) port. Many importers have found that entry level data is available at the 24 hour rule timeline, but were unaware that this data could be submitted to CBP this far in advance. Those importers who do submit this entry level data at the 24 hour rule timeline are further realizing the benefits of reduced cargo inspections.

All importers are strongly encouraged to adopt this "best practice" and submit entry level data at the 24 hour rule timeframe. Doing so further reduces the likelihood of an examination at either a CSI port or upon arrival in the United States.

The above listed "best practices" are but a few of the measures importer's may adopt which may help elevate an importer into Tier Three status. Additional "best practices" will be posted to the CBP C-TPAT website in the near future ([www.cbp.gov](http://www.cbp.gov)).

If you have any questions regarding this message, please contact your assigned Supply Chain Security Specialist, or you may contact the C-TPAT Program Office in Washington at (202) 344-1180 or via email to [industry.partnership@dhs.gov](mailto:industry.partnership@dhs.gov).

Sincerely,

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