



August 10, 2018

Border Security Regulations Branch Office of Trade
U.S. Customs and Border Protection

Re: Docket Number USCBP-2018-0019

Japan Machinery Center for Trade and Investment (JMC) appreciate this opportunity to present the comments to the above program.

We are a non-profit organization comprised of 244 Japan's major electronics manufactures, machinery manufactures and trading companies.

We have addressed to the U.S. supply chain security programs which U.S. CBP introduced and enforced after 9.11 terrorists attacks. JMC understand the purpose and background of ACAS, but we have some concerns to the possible influence brought by the enforcement of ACAS to the operation of the air cargo supply chain.

Most of our members largely depend on the air transportation exporting their products to the U.S. This is because the air transportation realizes the minimization of the transit time, optimizing the stocks in the U.S. as well as reducing the logistics costs, which enable the commodity supply to the U.S. consumers with less expensive and delay. However we have some concerns that the process filing the manifest data to U.S. CBP before loading might lead to the extension of the lead time and possible disruption of the supply chain.

Considering the case they receive the referral for some pieces of the unit load of the consolidated cargoes, forwarders and airlines may freeze the packing operation until they receive any message after the risk assessment so that they can respond to the referral promptly if issued. They will start the packing operation only after they receive the clearance message. Then they may advance the cut off time to ensure the required time for the packing operation which is equivalent to the length of the time between filing time and reception time of any message issued after the risk assessment.

Consolidated cargoes account for the majority of the air cargoes and most of them are loaded into the passenger flights which value the punctuality.

As we know that the forwarders and airlines do many works within the limited times, we are sensitized to the time possibly added by the full enforcement of ACAS

Having said that, any indication related to how soon the filers receive any message of clearance, referral or DNL after ACAS data submission from CBP will be appreciated. Because we think it will help the forwarders and airlines to consider the appropriate cut off time to comply with ACAS efficiently, which lead to the stable supply chain operation of the air cargoes.

Global Trade Facilitation committee
Japan Machinery Center for Trade and Investment (JMC)