

# JOINT INDUSTRY GROUP

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JBC International

Friday, January 25, 2002

U.S. Customs Service  
Information Services Group  
Room 3.2-C  
1300 Pennsylvania Ave, NW  
Washington, DC 20229

To Whom It May Concern:

The Joint Industry Group (JIG) thanks the United States Customs Service for the opportunity to comment on a notice for information collection requirements on Customs Commercial Invoices that appeared in the November 26, 2001 Federal Register (66 FR 59048).

JIG is a coalition with more than 160 members including Fortune 500 companies, trade associations, professionals and businesses actively involved in international trade. We both examine and reflect the concerns of the business community relative to current and proposed international trade-related policies, actions, legislation, and regulations, and undertake to improve them through dialogue with the Commerce Department, the Customs Service, other agencies and the Congress. JIG membership represents more that \$350 billion in trade.

Our members take exception to the listed estimated time per respondent as “10 seconds”. This is a gross underestimation of the time burden for the collection of information required by Customs on commercial invoices. Additionally, using Customs estimated total annualized cost to the public, this calculates to a salary of approximately \$14/hour or \$26,000/year. This figure does not accurately reflect the salary, benefits and other costs importers must expend to provide Customs the required information on a commercial invoice.

We believe a more accurate assessment of time per respondent is 15 minutes for the creation of each invoice. Further, the trade estimates the base cost of creating invoices to range from \$50 to \$60 per hour, and in some cases to cost significantly more.

As an example, most companies require similar pieces of information to be supplied on an invoice prior to authorization of payment. Customs requires the following data elements that are not generally required on corporate payment authorization invoices:

- Detailed product description;
- Country of origin;
- Harmonized tariff system number;

- Port of entry;
- Number & type of packages;
- All rebate, drawbacks & bounties;
- All goods and services furnished for the production of the merchandise;
- All charges upon the merchandise itemized by name and amount, including freight, insurance, commission, cases, containers, coverings and packing;
- In cases where classification or appraisal of merchandise depends on component materials, the invoice must list the value, weight, or other measurement for each component material; and,
- Additional detailed information on 47 classes of merchandise listed in 19CFR141.89.

While we understand the need for Customs to use this information to know what is entering the United States, Customs also needs to understand the burden importers face in providing this information. Many importers have complained about the escalating costs of providing Customs this information and would like to see that Customs truly understands the cost to business to comply with these requirements.

We thank you for your attention.

Sincerely,

A handwritten signature in black ink that reads "Ron Schoof". The signature is written in a cursive, flowing style with a large, prominent initial "R".

Ron Schoof  
Chairman  
Joint Industry Group