

NAFTZ Answers ACE Implementation Questions

One of the most urgent matters facing the FTZ community today is preparing for the implementation of the Automated Commercial Environment (ACE) in 2016. To help our members get ready for the new Customs automation system, the NAFTAZ hosted an informative webinar on Tuesday of this week, “Are You Ready for 06 Entry Filing in ACE?,” which provided participants an opportunity to ask detailed questions about how to best prepare for the transformation. To supplement answers given during the webinar, the NAFTAZ Automation Committee and ACE Task Force leaders have prepared the following Q&A for our members’ benefit:

1. Is the CF3461-06 going directly into ACE now? How does that work?

Filing of CF3461-06 is available in ACE and in ACS at this time. In order to know if yours are being filed in ACE currently, you must check you software if self-filing or ask your broker if you are using one to file to know to which CBP system your data is currently being transmitted.

2. Do FTZ entries now qualify for RLF processing with ACE?

Yes, RLF is available for 06 FTZ entries that are certified from summary. FTZ 06 weekly entries are not eligible for RLF.

3. Please confirm that changes to the 3461/Cargo Release outlined in the webcast apply to Type 01 consumption entries as well as Type 06 FTZ entries.

The Cargo Release CATAIR covers all entry types, so you have to read it carefully to understand what requirements are based on the entry type being filed. For example, name and address of the entities is required on all entry types, where status code is only required on a Type 06 entry. Here is a link to the [ACE Cargo Release CATAIR](#).

4. Do we have any information on changes to the e214 yet?

No, the CATAIR for FTZ admissions has not yet been published.

5. Is “Privileged Date” required for all PF status HTSs or only for those HTSs that have expired and a new HTS code is current?

The “Privileged Date” and “Current HTS Number” are only required on HTS numbers that have expired and were admitted to the zone in PF status.

6. Is the 06 entry filing in ACE for weekly estimated withdrawal designed to calculate 10th day entry summary due date based on zone week dates rather than initial release date?

The elected entry date will be given as the release date, provided that there are no holds or reviews put on the entry by CBP or a PGA. So the new entry date does not have an impact on the release date process.

7. In ACE, Line Item Quantity is required on the Entry Summary. To what quantity is CBP referring?

The "FTZ Line Item Quantity" refers to the quantity the zone uses to track the good. It would be found in your ERP or WMS system, or where you track your individual line item shipment quantities.

8. Where is Company unit of measure determined?

There is no means in the current CATAIR to report a unit of measure for the "FTZ Line Item Quantity" field on the entry (3461).

9. When will reporting PGA data electronically become mandatory?

Electronic filing in ACE will be mandatory for the following agencies as of Feb 28, 2016: FDA, NHTSA, and APHIS (Lacey) data. ACE must be used for filing AMS, APHIS Core, ATF, CDC, DCMA, DDTTC, DEA E&C, EPA, FSIS, FWS (contingent on FWS having its regulatory revisions in place by the July 2016 publication of the CBP Final Rule eliminating hybrid filings), NMFS and TTB data in July 2016.

10. Please clarify when PGA data is to be submitted to ACE: when reporting Cargo Release, Entry Summary or both?

PGA will be reported on Cargo Release for the 15 agencies that have provided guidance.

11. How are PGA's handling weekly estimates since the PGA data was not designed for such a filing?

At this time, we do not have detailed requirements from PGA's regarding weekly estimate filing.

12. Why isn't Fish and Wildlife included on the PGA list presented?

Fish and Wildlife have not yet published their Implementation Guide and have not yet indicated when they will be going live in ACE. The 15 PGAs published in the presentation are the ones that have given instructions and timelines for ACE roll out. There are 32 more PGA's that still have to formally publish their guidelines. [Find out more](#) about PGA's and the agency requirements by selecting the PGA tab.

13. Is there still going to be the option to report "FDA not required" on an entry?

Yes, there will still be an option to disclaim a PGA if the HTS flagged with the option. Some HTS numbers will require additional data just as is reported currently in ACS.

14. What is the Entity Role? What about the ID type?

Entity Role is the role a person or a company play in your supply chain. Examples of an entity include: Supplier, Manufacturer, and Seller. [View a complete list of entity roles](#) that can be found on page 252.

15. If our zone week ends on a date other than Feb 28, 2016, will we need to file two times within the zone week that spans that date?

You can start ACE entry filing at any point between now and February 28, 2016. Any entry that has been started in ACS before February 28, will need to be closed with an entry summary before the 28th when ACS is no longer available.

16: How will the “W” (Weekly Entry indicator) work for Supplemental Estimates/Entries?

There really is no change from the existing protocols in place today with ACS filing when it comes to the filing of a supplemental Weekly Entry. Let’s say that your zone week starts on Monday. You have filed your Weekly Entry (#1). It was authorized on the preceding Friday. If by, say, Wednesday you find that you need to file an additional Weekly Entry to cover your expected activity during your Zone Week, you would indeed file the second type 06 cargo release [aka Weekly Entry #2], marking it with the “W” (Weekly Entry indicator), and declaring the filing date (of Weekly Entry #2) as the elected entry date. For the purpose of this example scenario we will presume that Weekly Entry #2 is CBP-authorized the same day as the filing. Upon authorization of Weekly Entry #2 the FTZ Operator could begin to move authorized merchandise into the Commerce. Even though technically Weekly Entry would provide 7 days of removal activity from the FTZ from that Wednesday filing date, the Operator should operationally treat it as authorization for removal within the FTZ’s established Zone Week. Further, even though technically the entry summary for Week Entry #2 would not be due for a few days after the entry summary for Weekly Entry #1 is due, the Importer of Record should make sure that it is filed in line with the authorization/release date of Weekly Entry #1.

17. Who at NAFTAZ should I contact regarding programming questions?

The NAFTAZ ACE Task Force can assist with general questions regarding ACE preparedness and how to find published requirements. Specific questions regarding how to program to meet your specific situation should be posed to your software and service providers.

18. How can I submit a question to the ACE Task Force?

Questions about ACE can be sent to ACE@naftz.org