



MOL (America) Inc.

December 14, 2009

Re: 10 + 2 Importer Security Filing Requirements (Mandatory Compliance Phase)

Dear Valued Customer:

As the 10+2 mandatory compliance date of January 26, 2010 approaches, we would like to take this opportunity to recap the Importer Security Filing (ISF) and Additional Carrier Requirements, otherwise referred to as the **10 + 2 Rule**. The Importer Security Filing Program applies to goods being shipped to the U.S. by ocean carrier, and will require the submission of additional data elements **no later than 24-hours before the cargo is loaded onto the vessel**. While this ruling became effective on January 26, 2009, the Customs and Border Protection did allow for a 12-month “flexible” enforcement period, both for carriers and importers.

Basic Reporting Requirements:

Importer Security Filing (10 Additional Elements)

- Seller
- Buyer
- Importer of record number/foreign trade zone applicant identification number
- Consignee Number(s)
- Manufacturer (or supplier)
- Ship to Party
- Country of Origin
- Harmonized Schedule Commodity Code (6 digits)
- Container Stuffing Location
- Consolidator (stuffer)



Importer Security Filing (10 data elements) **must be transmitted no later than 24 hours prior to the container being loaded onto a U.S. bound vessel.** This information can be provided by the importer or its agent, which could include a Customs House Broker, Forwarder or other properly authorized party.

Please note: The party providing this data must have access to either the ABI (Automated Brokers Interface) or AMS (Automated Manifest System) and there is no requirement that the party making the Importer Security Filing reside within the United States.

MOL will provide the Booking Number to the Booking Party/Initiator. The Booking Number will convert to the bill of lading number. **It is the responsibility of the Booking Party/Initiator to provide the booking/bill of lading number to the Importer for their Importer Security Filing.** Compliance with "24-Hour Rule/Advance Manifest" cut-offs times will help ensure that bill of lading numbers are received in time to satisfy the ISF reporting requirements. Any modifications **made by the Booking Party** that result in a booking number change (splits, multiple bills requirements, etc.) must be conveyed **by the Booking Party** to their importer.

Importers have the option of filing the ISF 24 hours before the cargo is laden on board the vessel and submit a formal entry for the merchandise upon its arrival in the United States, or they can file a "Combined Customs Entry/Security Filing" 24-hours before the goods are laden on board the vessel for shipment to the United States.

Due to security concerns and the confidential nature of this data, MOL will not assume ISF 10 reporting responsibilities on behalf of the importer.

Carrier Data Reporting Responsibilities:

- Vessel Stow Plan (BAPLIE)
- Container Status Messages (CSM)

In addition, carriers are responsible for providing the following data elements for shipments consisting entirely of **Foreign cargo Remaining On Board (FROB)** or are intended either for **Transportation and Exportation (T&E)**, or **Immediate Exportation (IE)**.

- Booking Party
- Foreign Port of Unlading
- Place of Delivery
- Ship to Party
- Harmonized Schedule Commodity Code (6 digits)

As MOL is responsible for submitting this information to the CBP, **all shippers must provide the HTS Commodity Code(s) at the time of booking, and on their bill of lading instructions.**

We appreciate your continued support, and efforts to comply with these new regulations. Additional information can be found on www.cbp.gov.

Sincerely,

MOL (America) Inc.