

- **Ensure CBP's Budget Allocation and Funding Supports Trade Modernization and Facilitation:** Congress should increase funding for U.S. Customs Border Protection (CBP) to improve CBP's technical, e.g., ACE 2.0, and human resource capacity, e.g., additional import specialists.
- **1USG at the Border:** Codify the Border Interagency Executive Council and expand the council's role to oversee and align participating government agencies' (PGAs) requirements to mitigate risk in conjunction with homeland security risk prioritization, trade facilitation, and global standardization where possible. Develop one set of data and standard nomenclature. Replace multiple datasets, and a coordinated border management approach to customs modernization, where PGA's work to develop complementary and coordinated risk management processes, including the sharing of information; identifying trusted traders; and providing a single release at the border.
- **Additional Data Requirements:** Congress should create a framework to ensure proper justification of any incremental data request by any border agency, specifically by defining parameters and conditions to be met to support collection of incremental data.
- **Reinforce reasonable care and informed compliance:** Reasonable care decision-making should be re-engineered and measured at the \*account level\* instead of transactional levels (update mitigation guidelines); informed compliance should include transparent programs and reliable guidance that eliminate penalties. CBP can benefit from having an informed trade community.

- **Export Modernization:** Congress should encourage CBP to explore a multi-year initiative to improve the efficiency and effectiveness of the export processes. The initiative includes several different projects, such as: modernizing the electronic export manifest (EEM) system; Developing a new export enforcement strategy; creating a new export data analytics capability in ACE; and improving the coordination of export enforcement with other government agencies (BIS, State, DEA etc.).The goal of Export Modernization is to make it easier and faster for businesses to export goods from the United States, while also strengthening CBP's ability to enforce export laws and regulations. The benefits of Export Modernization are reduced paperwork and processing time for all entities; increased visibility and transparency into the export process; improved compliance with export laws and regulations; and enhanced enforcement capabilities.
- **Voluntary Progressive Filing with Facilitative Benefits:** Ability for facilitative data transmissions, provided in a manner that is progressive over time, provided that such input concludes prior to the conversion into an entry filing and is appropriately certified by the importer, importer of record or their agent licensed customs broker. Progressive must include facilitative priority processing and expedited release of merchandise from customs custody; reduce redundancies in the trade data that parties in a supply chain must provide; allow for the opportunity to resolve requests for additional information prior to departure or arrival of the merchandise; and reduce the need for a demand for redelivery to customs custody.
- **Improve IPR information sharing:** For intellectual property purposes, allowing the sharing of shipment information with "rights holders" who could ensure compliance with Customs laws; and ensure that the shipment importer is informed in advance of the "rights holders".
- **Improve Bad Actor information sharing:** The government should tell traders who the bad actors are and specifically state which parties that businesses should not engage, like a denied party or import bad actors list; clearly define convicted bad actors vs. suspected bad actors. Publish information about the relevant countries, industries, parties, etc.

- **1USG Trusted Trader Program:** Congress should create one trusted trader program for all government agencies, which considers a company's membership when processing compliance complaints, fines, penalties.
- **Codification of Trusted Trader Benefits:** Trusted Trader program intents need to be explicitly outlined. Congress should ensure that trusted trader programs do not move beyond the program's original intent. Trusted Trader program benefits need to be explicitly outlined, including fee reductions for members (ex: MPF and HMT) and other facilitative benefits.
- **Continue to Facilitate Entries Under Regulations:** Congress should expand the United States' global leadership in implementing the Trade Facilitation Agreement by amending 19 USC 1498 to grant the Secretaries the ability through rulemaking to adjust for inflation for entries under regulations. Finally, Congress should codify the parties granted the right to make entry as currently defined under customs regulations.
- **Drawback Simplification:** Reduce unliquidated claims; streamline privilege application process; and improve CBP Headquarter's ruling process.
- **Codify Express Delivery Facilitation (Part 128):** Codifying the unique processes and procedures of the express industry in statute, as currently reflected in regulation and trade agreements, would recognize the express sector as a standard mode, like rail, truck, and ocean vessel.