SIA – 2026 SUMMER BACK TO BASICS

You've Got Your License… Now What?
or
Where Export Meets Customs…

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International Trade Compliance Strategies, LLC
(ITC Strategies)

Conference Agenda

We are here in the transaction process!

Trade Compliance Programs → Submission Tools → ITAR Registration (as required) → Jurisdiction and Classification →

ITAR Exemptions/ EAR Exceptions → ITAR/EAR Licensing → ITAR Agreements → **Customs Clearance** → Disclosures and Enforcement

YOU'VE GOT YOUR LICENSE NOW WHAT…

- License Management
  - Proviso compliance
- Customs / Shipping / Logistics
- Record keeping

LICENSE MANAGEMENT

Be Proactive, not Reactive!

WHILE YOU'RE PREPARING YOUR LICENSE APPLICATION….

- Think about Shipping and Export Documentation!

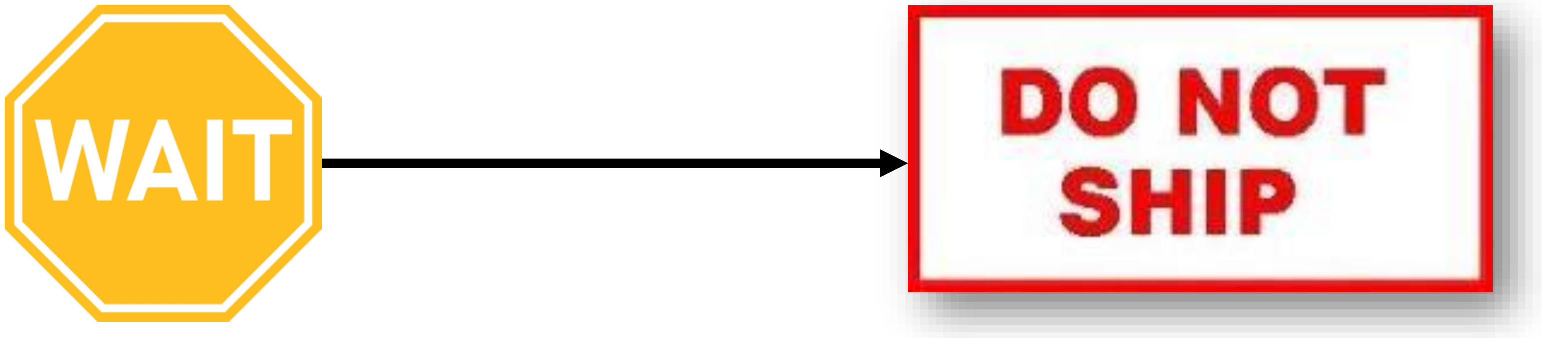
- Consult with your Traffic/Logistics Departments to understand and include:
  - Foreign Intermediate Consignees
    - Foreign Freight Forwarders
  - US Freight Forwarders

LICENSE MAINTENANCE

- Review licenses for provisos/limitations/conditions
- Ensure Licenses are properly decremented
  - Ensure Records are kept as required
- Apply for replacements in timely manner
  - Don’t wait for items to be ready to ship to address licensing
- Notify DDTC when:
  - Agreements are not executed within a year
  - Agreements are terminated

More Regulations

- You may have gotten your authorization to export, but you are not done…



- Another set of regulations governs the actual shipment of the item…
- And there are still more hoops to jump through…

SHIPPING PRODUCTS

- Getting the license is not enough…
- Proper paperwork must be filed for all tangible exports (and imports)
  - Ensure that Licenses are properly decremented – Keep Records!
    - Licenses DSP-5, DSP-61, DSP-73
      - Not presented to CBP - decremented through ACE/AES
      - Check with your local port or freight forwarder for any Port specific practices

- Automated Export System (AES) Filing **must** be completed and approved ***BEFORE*** an export can occur
  - ALL ITAR Hardware Exports require an AES Record be filed
  - ALL EAR Licensable Hardware Exports require an AES Record be filed
    - ALL 600 Series Exports require AES to be filed as well!

SHIPPING DO'S…

- Be Consistent!
  - License Description and Shipment Description
  - Schedule B/HTS Commodity Codes
  - Ensure FF used is authorized by License **(ITAR)**
  - Ensure "Ship To" address is **EXACTLY** as it appears on license
  - Ensure the Destination Control Statement & License or Exemption appears on Shipping Documents
    - Note: Use of ITAR exemptions require specific language on shipping documentation
      - Include proper certification and clauses
  - Ensure ITN appears on Shipping Documents
  - Ensure Port of Exit reported to AES is **Actual** Port of Exit
  - Follow required Wait Times

REQUIRED WAIT TIMES

Mode	USML	CCL
Truck	8 hours	1 hour prior to arrival at Border
Air	8 hours	2 hours prior to wheels up
Rail	24 hours	2 hours prior to arrival at border
Vessel	24 hours	24 hours prior to departure
Timelines apply to Hand Carried shipments as well!		

§ 123.9 COUNTRY OF ULTIMATE DESTINATION AND THE DESTINATION CONTROL STATEMENT

(a) The country designated as the country of ultimate destination

i. on the export license, or

ii. Electronic Export Information (EEI) filing where an exemption is claimed,

<u>must be the country of ultimate end use</u>

(b) The exporter <u>must</u> inform the end-user (and all consignees) that the defense articles being exported are subject to U.S. export laws and regulations:

(1) The following information <u>must</u> be incorporated as an <u>integral</u> part of the commercial invoice, whenever defense articles are to be shipped (i.e. exported in tangible form):

(i) The country of ultimate destination;

(ii) The end-user;

(iii) The license or other approval number or exemption citation; and

(iv) The following statement:

"These items are controlled by the U.S. government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the U.S. government or as otherwise authorized by U.S. law and regulations."

§ 758.6 DESTINATION CONTROL STATEMENT

(a) The exporter <u>must</u> incorporate the following information as an <u>integral</u> part of the **commercial invoice** whenever items on the Commerce Control List are shipped (exported in tangible form):

(1) The following statement:

"These items are controlled by the U.S. Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the U.S. government or as otherwise authorized by U.S. law and regulations" and

(2) The ECCN(s) for any "500" or "600 series" "items" being shipped

Hand Carries - Exports

- Shipments being hand carried by employees still require the same level of detail and documentation as if shipment were shipped through a forwarder

- Same export documentation required regardless of means of export
  - Commercial Invoices must be prepared and contain the proof of AES filing as well as the applicable DCS

  - AES for hand carry must be filed pre-departure in accordance with the required wait times.
    - ITAR item must be filed 8 Hours prior to departure!
    - EAR item must be filed pre-departure in accordance with appropriate mode of transportation!

HAND CARRIES – EXPORTS

- Laptops should also have documentation!
  - Laptop Hand Carry Form or Laptop Letter
  - AES filing generally not required
- Most Laptops ECCN - 5A992.c
- Send clean laptops, if possible!
- If ITAR technical data is on laptop <u>for employee's use only</u>, cite 22 CFR 125.4(b)(9)
- If EAR technology, cite 15 C.F.R. § 740.9 license exception TMP

My Laptop contains ITAR controlled technical data generally described as follows:

Quantity	*Technical Data Description*

Insert item

"22 CFR 125.4(b)(9) Applicable"

1. I certify that I am a U.S. Person and the technical data is for my use only and will not be shared with any foreign party unless authorized under a separate license or other approval.
2. I will not travel through or to any of the countries prohibited by the U.S. Department of State, listed here: https://www.pmddtc.state.gov/embargoed_countries/index.html

I, ______ * acknowledge the above ☐

Submit | Cancel

Temporary export of a Laptop Computer from the United States

I hereby certify that the commodities identified below are the property of ________________. and are being temporarily exported from the United States in accordance with the requirements of the Export Administration Regulations (EAR), 15 C.F.R. pts 730-774. These commodities:

- Are for the personal use of and will remain under the control of the U.S. person presenting this letter;
- Are for temporary export and subsequent re-import only and are not for resale abroad;
- Will be returned to the United States within twelve (12) months of the initial departure date;
- Are "tools of the trade" and are used in the ordinary course of the company's business; and
- Qualify for License Exception TMP (15 C.F.R. § 740.9) – Shippers Export Declaration/AES not required.

ROLE OF THE FREIGHT FORWARDER

- Advises clients on rates, routings and modes of transportation;
  - Provides and coordinates complete logistics services

- Air Cargo Agents are accredited by the International Air Transportation Association (IATA) and Transportation Security Administration (TSA)

- Ocean Freight Forwarders are licensed with the Federal Maritime Commission (FMC)

- Reputable Forwarders are aware of the ever-changing regulations affecting cargo movements such as:
  - foreign documentation requirements
  - hazardous materials rules
  - special packaging restrictions
  - U.S. Government regulations and licensing provisions

ROLE OF THE CUSTOMS BROKER

- Licensed by the U.S. Customs and Border Protection (CBP)
- Knowledgeable of Customs regulations
  - Stay current with changes in the law and administration regulations
- Through ABI and ACE are aware of commodities subject to other government regulations such as USDA, EPA, FCC, FDA, BATF, DOS, etc.
- Experienced in determining the Harmonized Tariff Schedule (HTS) number and the dutiable value of imported merchandise

USING A CUSTOMS BROKER & FREIGHT FORWARDER

- **DO NOT <u>ASSUME</u> that your Customs Broker and/or the Freight Forwarder knows the ITAR or EAR!**

- **Obtain "certifications" from your Freight Forwarders**
  (22 CFR 126.13)

  I certify the following as required by 22 CFR § 126.13(a):

  1. Neither XYZ Co., nor its chief executive officer, president, vice presidents, secretary, partners, members, other senior officers, officials, or any member of its board of directors:

     a. Is the subject of an indictment or has otherwise been charged with, or convicted of, violating any of the U.S. criminal statutes; or

     b. Is ineligible to contract with, or receive a license or other approval to export or temporarily import defense articles or defense services from any agency of the U.S. Government.

  2. To the best of my knowledge, no party to this transaction has been convicted of violating the U.S criminal statutes or is otherwise ineligible to receive U.S. Government export authorizations.

  3. I certify that the information contained in this certification is true and correct to the best of my knowledge.

- **Constantly monitor their performance**

FORWARDERS AND BROKERS

- Freight Forwarders & Customs Brokers act as <u>your</u> agent
  - Their mistakes or violations go against <u>YOU</u>

- Acting through a forwarder does not relieve <u>YOU</u> of responsibility for compliance with the regulations
  - ITAR, EAR, OFAC, BATFE or FTR

- Ensure that your forwarders and brokers are provided with accurate information

WORKING WITH YOUR CUSTOMS BROKER & FREIGHT FORWARDER

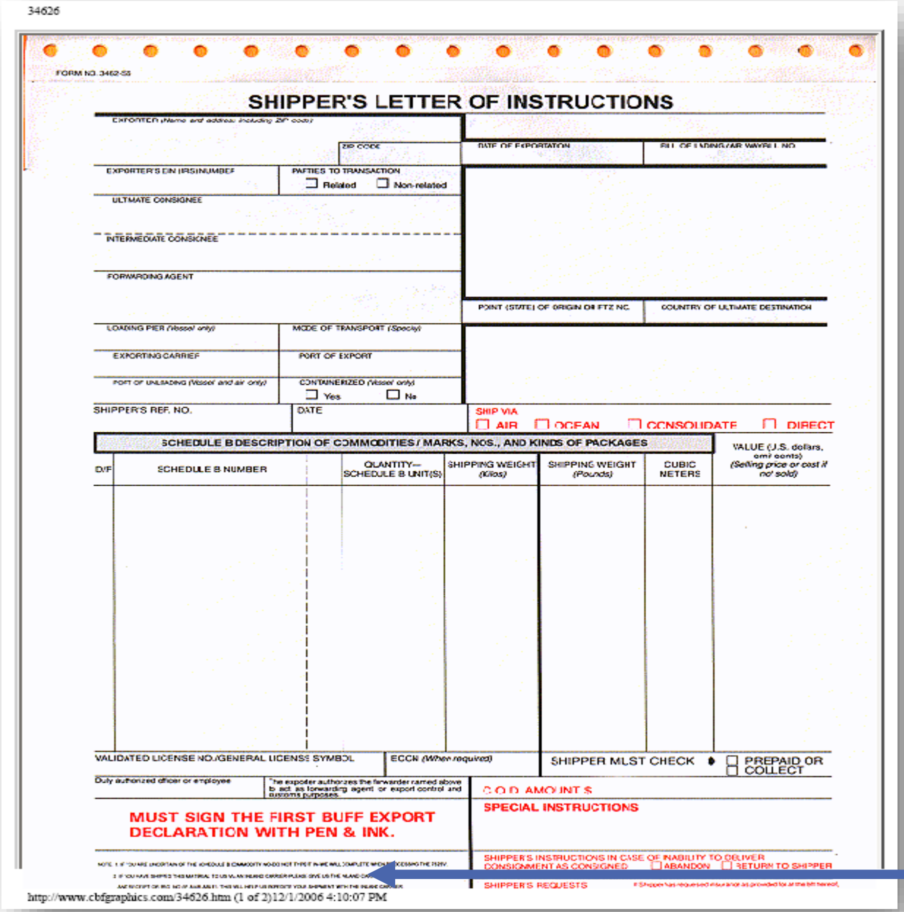
- Establish a system of communicating with your Customs Broker & Freight Forwarder for every import entry and export shipment
  - Create a checklist
  - Provide written instructions
  - Develop a regular Audit process
    - Audit “ALL” documents
    - Monitor temporary licenses
    - Follow up!

SHIPPERS LETTER OF INSTRUCTION (SLI)

- A *Shippers Letter of Instruction* (*SLI*)
  - used to convey specific shipment information from the exporter to the forwarder which is required for export clearance and handling purposes

- The *SLI*, when endorsed by the exporter,
  - provides a limited Power of Attorney to the forwarder
  - allows the forwarder to file the AES record and execute any required export documents

SHIPPERS LETTER OF INSTRUCTION (SLI)



27. LICENSE NO./LICENSE EXCEPTION SYMBOL/AUTHORIZATION	28. ECCN (When required)
29. Duly authorized officer or employee	The USPPI authorizes the forwarder named above to act as forwarding agent for export control and customs purposes.
30. I certify that all statements made and all information contained herein are true and correct and that I have read and understand the instructions for preparation of the SED, set forth in the "**Correct Way to Fill Out the Shipper's Export Declaration**". I understand that civil and criminal penalties, including forfeiture and sale, may be imposed for making false or fraudulent statements herein, failing to provide the requested information or for violation of U.S. laws on exportation (13 U.S.C. Sec. 305; 22 U.S.C. Sec. 401; 18 U.S.C. Sec. 1001; 50 U.S.C. App. 2410).	
Signature	Confidential – For use solely for official purposes authorized by the Secretary of Commerce (13 U.S.C. 301 (g)).
Title	Export shipments are subject to inspection by U.S. Customs Service and/or Office of Export Enforcement.
Date (mm/dd/yyyy)	31. AUTHENTICATION (When required)
Telephone No. (Include Area Code)	E-mail Address

Be careful when providing SLI for Routed Export Transactions.

FOREIGN TRADE REGULATIONS
&
AUTOMATED EXPORT SYSTEM

Foreign Trade Regulations (FTR) 15 CFR Part 30

- The **International Trade Management Division** (formerly the *Foreign Trade Division*) of the **Census Bureau** administers the **Foreign Trade Regulations** (FTR) (15 CFR Part 30)
  - Regulations for the filing of Export Trade and Statistical Data
  - Penalties for Non-Compliance
  - Delegated enforcement responsibilities to BIS (OEE) and CBP

- Must comply with ITAR, EAR and FTR requirements
  - *http://www.census.gov/foreign-trade/index.html*

- Automated Export System (AES)
  - system that collects the Electronic Export Information (EEI)

ACE / AESDIRECT

- ACE was established by Executive Order to streamline the Import and Export process and create a single portal for exports and imports
  - Census and CBP migrated the AESDirect system into the International Trade Data System's (**ITDS**) ***Automated Commercial Environment*** (ACE) portal
    - **AESDirect is now a module within ACE**
      - To access ACE: ***https://ace.cbp.dhs.gov***
      - To establish an ACE Account: *https://www.cbp.gov/trade/automated/getting-started*

WHO CAN FILE AES?

- EEI can be filed by the
  - U.S. Principal Party of Interest (USPPI),
  - its authorized agent, or
  - the authorized agent of the Foreign Principal Party in Interest (FPPI) (15 CFR 30.2)
- If using an agent, requires a Power of Attorney or Written Authorization
  - *http://www.census.gov/foreign-trade/regulations/power-of-attorney-sample.pdf*

- Using an agent to file your EEI does not relieve you from the responsibility of complying with all the Regulations

When is AES Required?(FTR 30.2)

- For virtually all shipments:
  - To foreign countries
  - Between the U.S. and Puerto Rico
  - From the U.S. to U.S. Virgin Islands
  - From Puerto Rico to U.S. Virgin Islands

REQUIRED DATA (THE BIG 10)

- Name & Address
- EIN
- Origin of the Shipment
- Description
- Origin of the Goods (D or F)
- Schedule B/HTS number
- Quantity
- Value
- ECCN (if applicable)
- License Authority Information
  - License Information
  - Exemption / Exception

AES Submission Reminders

- All submissions are checked against DDTC licensing data which is provided directly to CBP

- Double check the accuracy of your AES submission
  - A data-input mistake could cause your shipment to be rejected, detained or seized.
  - You can also be fined!

- Avoid double submissions
  - If you discover a double submission, correct the error by submitting a “delete” for one of the two submittals

AES RESPONSES

- Fatal Errors – transmission rejected
  - ***Correct Immediately***
- Compliance Alert
- Warning Errors –
  - Correct within 4 days of transmission
  - Reminder every 7 days
- Informational and Verify Messages
- **Shipment Accepted generates Internal Transaction Number (ITN)**

AES Response – Fatal Error

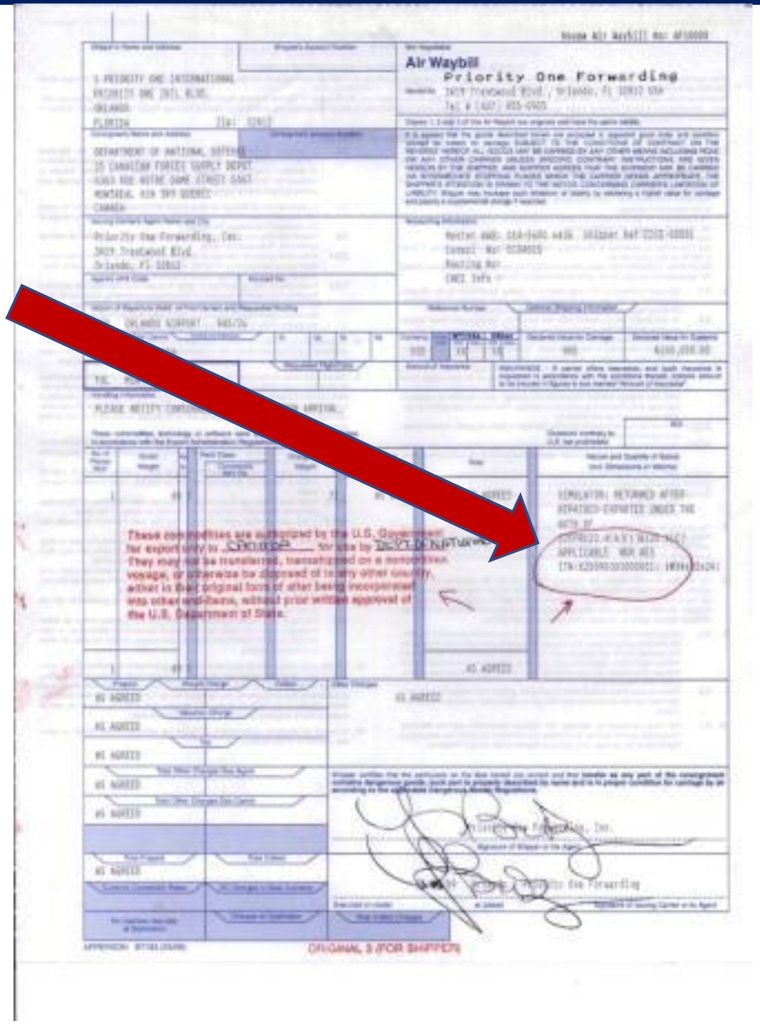
```
Submission Status: REJECTED

Errors:
- Fatal Error 602: Invalid Schedule B Number.
- Fatal Error 117: Ultimate Consignee Country Code is invalid.

ITN:
Not Assigned
```

AES Response - Accepted

```
Submission Status: ACCEPTED

Internal Transaction Number (ITN):
X20260617123456

Filing Date/Time:
2026-06-17 14:32:18 EDT

Shipment Reference Number:
SO-123456

Filer ID:
123456789

Status:
Accepted

Messages:
- EEI submission successfully accepted by AES.
- No fatal errors detected.
```

AES PROOF OF FILING CITATIONS

- Annotate, on the AWB, BOL, or other transportation document, the proper AES exemption legend or proof of filing citation, for example
    - AES ITN: X20260015000001


Air Waybill
Priority One Forwarding
ORIGINAL 3 (FOR SHIPPER)

When there is an error…

- Certain errors can be corrected in AES
  - You discover after the shipment is made that you have understated the value…submit a correction to AES and correct your documentation
  - You report a shipment, then the shipment is cancelled. You can submit a "Delete" to AES

- If an Error cannot be corrected, you may need to submit a voluntary disclosure to Census, State and/or Commerce (***§ 30.74 Voluntary Self-Disclosure)***

COMMON ERROR: DDTC REGISTRATION EXPIRED

- Check your records! AES will not allow you to ship with an expired registration code

- This can occur when export date is after the registration expiration date

- If your registration is not expired and you receive this message, please call DDTC to resolve the problem

COMMON ERROR: LICENSE IS EXHAUSTED

- AES and DDTC records show that this shipment exceeds the remaining balance on the license
- Problem with DSP-5???
  - Contact DDTC
- Double submission - If you submit a shipment twice and get two different Internal Transaction Number (ITN) numbers, two shipments will be decremented from your license. You must submit a “delete” for one of the shipments to correct the error. You may need to contact Customs if the value is not added back to your license.

Common Error: Amended Licenses

- The license data in AES may not have been updated to reflect your amendment

- When filing an AES submission fill in the original license number NOT the amendment case number!

Common Reasons For Detentions / Seizures

- Using a forwarder that is not approved on the license
- Using ITAR exemptions in situations where they do not apply
- Incorrect “ITN” reflected on shipping documents
- Incorrect Port of Export on EEI
- Failing to file within the correct time limits
- Failing to follow specific port procedures

CUSTOMS AND BORDER PROTECTION

- Work with CBP Officers to determine what they like to see on documents & their procedures

- CBP Procedures differ Port to Port – "*Pipeline*"

5600 Pearl Street
Rosemont, IL 60018-5213

Port of Chicago – Pipeline

U.S. Customs and Border Protection

Pipeline 15-06
May 20, 2015

TO: Customs Brokers, Importers and Others Concerned

SUBJECT: Guidance on Date of Export Foreign Trade Regulations Penalties

Effective immediately, U.S. Customs and Border Protection (CBP) will utilize the following guidelines for the issuance of Foreign Trade Regulations (FTR) penalties for reporting an incorrect date of export in the Electronic Export Information (EEI) filing submission via the Automated Export System (AES) or AESDirect:

- Penalties will be issued when the cargo is exported prior to filing of the EEI submission (except for approved Option 4 post-departure filers);
- No penalty will be issued when the EEI has a reported date of export between **1 and 4** days, prior to the actual date of export;
- A penalty may be issued when the date of export reported on the EEI submission is **5** or more days prior to the actual date of export. It is the responsibility of the USPPI or their authorized agent to update the EEI submission to reflect the correct date of export. No penalty will be issued if the date of export is updated prior to, or on the date of export.

Penalties against the exporter, or their authorized agent, will be waived if adequate evidence is provided, such as paper documentation or email traffic that demonstrates they are not the party of responsibility for the violation.

Please refer any questions regarding this pipeline to CBP Chief Mario Cornejo at (847) 928-5142.

Matthew S. Davies
Area Port Director
Area Port of Chicago

TEMPORARY IMPORTS - ITAR

- Temporary Imports may be authorized by ITAR Exemption or License
  - *123.4, DSP-61, etc.*

- Ensure your Customs Broker coordinates imports with you!
  - Provide written instructions
  - Verify Entry Documents contain correct statements
    - CBP Forms (3461; 7501; 3311) must reflect the ITAR exemption
      - "This shipment is being imported in accordance with and under the authority of 22 CFR 123.4(a)(identify applicable subsection)"
  - Ensure Customs Broker files required PGA Message Set

- If Statements were omitted from the documents at the time of entry, a Corrected Entry should be submitted to CBP, **ASAP!!!**

TEMPORARY IMPORTS – ITAR

PGA MESSAGE SET

Cargo Release ACE Status Notification — SmartBorder ABI Messages

Cargo Release ACE Status Notification — Message Received: 02/07/[redacted]

BROKER [redacted]

PHONE: [redacted] FAX: [redacted]

S010
District/Port of Entry: 1704 Entry Filer Code: [redacted] Entry #: [redacted]
Entry Type Code: 01 Importer of Record #: [redacted] Carrier Code: CI
Vessel Name: Voyage/Flight/Trip Manifest #: 5256
Date of Arrival: 01/31/[redacted] Split Shipment Release Code: Correction Response Indicator:

S020
Reference Identifier Qualifier: CR Filer-defined Reference Number
Reference Identifier: [redacted]

S040
Bill Type Indicator: M Master Bill of Lading Issuer Code of Bill of Lading:
Bill of Lading #: [redacted]
Quantity: Unit of Measure: Manifested Quantity:

S040
Bill Type Indicator: H House Bill of Lading Issuer Code of Bill of Lading:
Bill of Lading #: [redacted]
Quantity: 00000001 Unit of Measure: Manifested Quantity: 00000001

S050
Disposition Date: 02/07/[redacted] Disposition Time: 1613 Disposition Code: 95
Narrative Message: BILL ARRIVED Split Indicator:
Carrier Code: Voyage/Flight/Trip Manifest #: Date of Arrival: / /
District/Port of Arrival:

S060
Disposition Action Date: 02/07/23 Disposition Action Time: 1613
Disposition Action Code: 98
Narrative Message: RELEASED Release Date: 02/07/23
Release Origin: Selectivity Processing Date Document Type:

S060
Disposition Action Date: 02/07/23 Disposition Action Time: 1613
Disposition Action Code: 01
Narrative Message: ONE USG Release Date: / /
Release Origin: Document Type:

S070
Government Agency Code: DTC Agency Program Code: DTC Status Action Date: 02/07/23
Status Action Time: 1613
PGA Entry Level Status Code: 07 PGA Entry Level Status Msg: MAY PROCEED
Entry LINE Level Status Code:
PGA LINE Level Status Code: MAY PROCEED Status Reason Code:
Beginning CBP Line: 0002 Beginning Tariff Position: 1 Beginning PGA Line: 001
Ending CBP Line: Ending Tariff Position: Ending PGA Line:
Document Type Code: PGA Entry Hold Type PGA Processing Group Version 03

Items 2 & 3 Itar Exemption 22 CFR 123.4(a)(1)

[redacted]

Subsequent Export - ITAR

- AES Filing must cite exemption (123.4(a)(identify applicable subsection))

- Foreign consignee and end-user on EEI must be same as at time of import (22 CFR 123.4(c)(2))

- *If requested* by CBP, the Entry Document Number or a copy of the CBP Document under which the item was imported

TEMPORARY IMPORTS – KEY PRACTICES

- Provide your International Vendors/Customers Instructions on what needs to be included on Shipping Documents
  - (include ITAR Exemption or License Information)

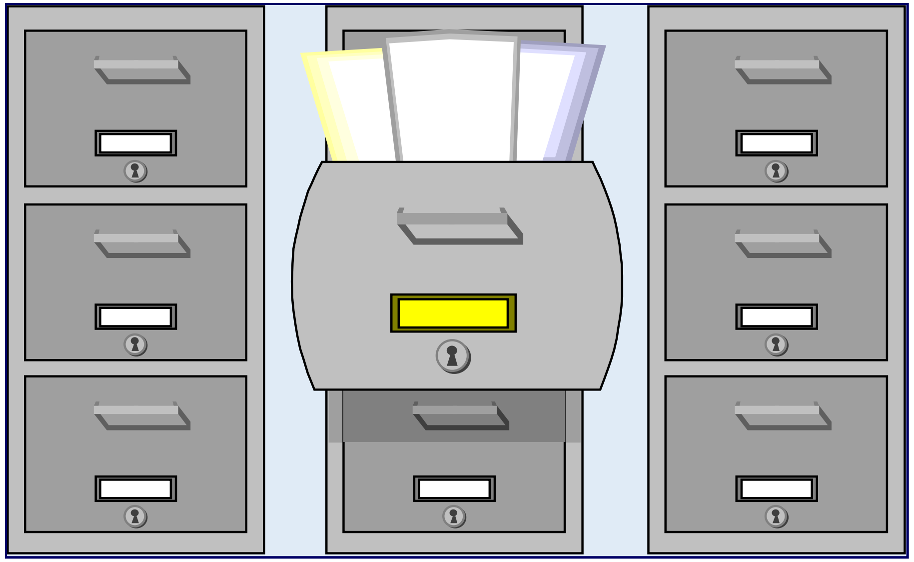
- Provide Your Field Service Reps with Instructions

- Be careful with using “express” carriers. ASK which service to use.

HAND CARRIES - IMPORTS

- Imports via Hand Carry may <u>*require*</u> a Customs Entry
- Advise your travelers to ensure coordination *prior* to arrival in the US
- Port practices may differ
    - As they do for exports

RECORD KEEPING



WHY KEEP RECORDS?

- Compliance System Backbone
- Provides Audit Trail
- Available to support USG requests

"If you don't keep records how can you prove you did it right?"

Why Keep Records?

- Required by Law

- It's in the regulations
  - ITAR – Part 122.5
  - EAR – Part 762
  - Customs – Part 163
  - FTR – 30.10

WHY KEEP RECORDS?

- If there is a violation, detention, seizure or directed disclosure, records can save you
- If you don't have them, you could face a more in-depth USG audit
  - regardless of whether you did something wrong or not

Record Keeping

- Records must be kept for ALL exports
  - Licensed
  - Exports under exemptions/exceptions
  - Deemed Exports
  - Hand-carried exports
- Records must be kept for 5 years from:
  - Date of Export (Commerce) or
  - Date of Expiration of License (State)
- Identify who is responsible for maintaining records;
  - Centralize records when possible
- Recordkeeping is the key to proving compliance

Record Keeping

- **Hardware Shipments**
- **Tech Data Transfer Logs**
  - Phone Calls
  - Emails
  - Data Sharing tools
    - WebEx
    - SharePoint
- **Access Logs**
  - Information Technology
    - Server Access
    - File Access
  - Facility Access and Visitors

SUGGESTED DOCUMENTATION FOR RECORDKEEPING

- Export Licenses & associated attachments
- Agreements & associated attachments
- Approvals with provisos received from USG
- Electronic Export Information
- Shippers Letters of Instruction
- Sales Agreement
- Pro-Forma Invoice
- Purchase Order
- Purchase Order Acceptance or Confirmation
- Commercial Invoice
- Bill of Lading
- Packing List
- Air waybill
- Inspection Certificate
- Marine and Air Insurance Policies and Certificates
- Dock and Warehouse Receipts
- Certificates of Origin (NAFTA)
- Certificate of Registration
- Shippers Declarations for Dangerous Goods (HAZMAT)
- Delivery Orders
- Letter of Credit
- Carnets
- Temporary Import Bonds
- U.S. Custom Entries

BEST PRACTICES

- Use a knowledgeable Customs Brokers/Freight Forwarders
  - Knowledgeable of the Regulations (ITAR / EAR);
    - Foreign Government requirements;
    - your specific transportation requirements

- Provide Training specific to Shipping & Export Documentation
  - Shipping Documents must be accurate and complete…
  - Be consistent…
  - Maintain Accurate Records

- Review “requests” to ship in order to assign or verify license or exemption

Best Practices

- Understand the Shipping Requirements BEFORE you submit your license
  - Coordinate License Applications with your Shipping Experts…

- Provide details of license to your Shipping Department – they must know exactly what is authorized
  - Maintain and share your licenses with those that need to know…

- Remember that failure to file the proper paperwork or incorrectly filing the paperwork can be VERY COSTLY to your Company
  - Penalties for improperly exporting (even with a license) can be severe!

Best Practices

- Ensure Hand Carries are treated in the same manner as shipments

- Audit Export and Import transactions regularly… Don’t wait until license has expired!
  - Perform regular reviews
  - When you find an error, correct and disclose

- Verify entries related to the export and import on Temporary Licenses immediately after the transaction
  - it’s easier to correct when it’s current!

- Work closely with shipping department and forwarders/brokers.
  - *They are your **Last line of defense***

AND LASTLY…

A CARNET IS ***NOT*** AN EXPORT LICENSE!!!!!

QUESTIONS