



## IAM GUIDE TO THE IMPORTER SECURITY FILING (ISF) IAM GUIDE TO THE IMPORTER

The Importer Security Filing (ISF) regulation is set to impact all companies engaged in maritime import trade with the United States. Starting today, January 26th, 2010, the regulation officially became effective and importers are now required to comply. In an effort to inform our members, we have published a series of useful terms and Frequently Asked Questions (FAQs) that will serve as an aid for those who need to comply with the new regulation. This information will be available for reference on our website at <http://www.iamovers.org/alerts.html>. More general FAQs can be found on US Customs and Border Patrol's (CBP) website linked below:

[http://cbp.gov/xp/cgov/trade/cargo\\_security/carriers/security\\_filing/](http://cbp.gov/xp/cgov/trade/cargo_security/carriers/security_filing/)

### Useful Terms:

**Importer Security Filing (ISF):** Colloquially known as the "10 + 2" regulation, this is the official name of the regulation requiring US importers to provide a set of ten data elements 24 hours prior to vessel loading.

Ten data elements must be provided to CBP via their electronic systems by the ISF Importer or its authorized agent. The additional two data elements must be provided by the shipping line to CBP. These two elements are the vessel stow plan and the container status message. Hence, the name is "10 + 2".

**Automated Broker Interface (ABI):** One of two electronic systems that can be used by ISF filers to enter the required data elements.

**Automated Manifest System (AMS):** One of two electronic systems that can be used by ISF filers to enter the required data elements.

**ISF Importer:** Party responsible for the timely and accurate filing of the ISF. In terms of HHG/PE shipments, the ISF Importer will be the transferee importing their goods from origin to the United States.

### **The Ten Data Elements required by CBP 24 Hours prior to Loading:**

1. **Importer of Record Number:** For US residents, a Social Security Number may be provided as long as it has been recorded by CBP. Alternatively, a passport number with country of issuance and a date of birth must be provided.
2. **Consignee Number:** May be the same as the Importer of Record Number.
3. **Buyer (Owner):** Owner's name and new address in the United States.
4. **Seller (Owner):** Owner's name and last foreign address.
5. **Ship to Party:** Generally, this is the importer's new address in the United States.
6. **Manufacturer (Supplier) Name / Address:** Not required. This will automatically default to show the Seller (Owner) name / address.



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7. Country of Origin
8. Commodity HTS-6: 9804.00 is the code that denotes Household Goods.
9. Container Stuffing Location: Name and address(es) of the physical location(s) where the goods were stuffed into the container. For break bulk shipments, the name and address(es) of the physical location(s) where the goods were made “ship ready” must be provided.
10. Consolidator (Stuffer) Name / Address: Name and address of the party who stuffed the container or arranged for the stuffing of the container. For break bulk shipments, the name and address of the party who made the goods “ship-ready” must be provided.

**Frequently Asked Questions:**

**1) Is a bond required to file an ISF for HHG/PE imports?**

CBP requires an ISF coded transaction—in simple terms, a code number—for all shipments coming into the US; the code number denotes whether a shipment is required to have a bond to cover ISF filing requirements. The ISF coded transaction for household goods is 03, and this number must be entered at the time of filing, along with the 10 data elements listed below.

In its meeting with IAM staff, CBP confirmed that shipments coded 03 will not require a bond. As a result of this exemption, fines for non-compliance will not be administered under the framework of the Importer Security Filing.

**2) Who would be named in question as the manufacturer (supplier), seller, and buyer on a military household goods shipment?**

On an Importer Security Filing (ISF), a military service member importing his/her Household Goods/Personal Effects (HHG/PE) will be entered as the manufacturer (supplier), seller, and buyer.

**3) Do we need to transmit both the Social Security Number and the passport number on shipments for American Citizens?**

CBP will only require one form of identification to be used. If a Social Security Number is entered as an ISF data element, it will suffice.

If a passport number is entered into the ABI/AMS, the country of issuance and the corresponding birth date of the ISF importer must also be entered for the ISF to be deemed complete.



**4) Are there any requirements of confidentiality of the SSN?**

According to CBP, all information disclosed when completing an ISF is deemed confidential and not eligible for public access.

**NOTE:** It is important to remember though that some information found on a bill of lading is public record. Therefore, please publish as little personal information about your transferees on bills of lading and implore the shipping lines that they do not disclose this information on manifest data as they can be accessed by outside entities.

IAM will be publishing a separate message that will advise all companies how to contact CBP to request confidentiality on their shipments.

**5) Do military service members have to transmit their complete Social Security Number?**

According to Surface Deployment and Distribution Command (SDDC), Department of Defense (DOD) personal property shipping offices must include the shipper's full SSN on the DD Form 1252/1252-1.

**6) HHG/PE import shipments are exempt from filing a bond. Does that mean that filers can disregard the “24 prior to loading” rule for filing information?**

All HHG/PE import shipments must still be filed 24 hours prior to lading regardless of the exemption. While HHG/PE import shipments will not be penalized under the framework of the ISF, CBP has confirmed that they will utilize existing deterrence measures to enforce compliance. These existing deterrence measures include non-intrusive inspections, intensive exams, customs holds, and General-Order Warehouses.

**7) What identification number is required for parties without U.S. social security numbers shipping household goods?**

In this instance, the passport number, country of issuance, and date of birth will be accepted. A customs assigned number (CAN) may also be obtained in the ABI provided the filer has knowledge of the importer's name and foreign address.

**8) I have currently been doing an ISF 5 for all my entries, so should my company actually be completing an ISF 10 instead?**

The ISF-10 is to be filed for all inbound cargo with the exception of freight remaining on board (FROB), goods moving on an Immediate Exportation (IE) or Transportation and Exportation (T&E) in bond.



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Therefore, unless you are dealing with FROB, IE, and T&E shipments, you should be filing an ISF-10.

**9) We are aware that the OBL number is needed before the shipment can be loaded, but we do not receive the OBL number until after the shipment is loaded.**

**Can you please clarify?**

Yes. The ISF Importer, or its appointed agent, must obtain this information and provide it to CBP as part of the ISF filing. The ISF needs to be submitted at the lowest bill of lading level (i.e., house bill or regular bill) that is transmitted into the AMS/ABI. The bill of lading number is the only common “link” between the ISF and the customs manifest data.

**10) Based on the information provided in the Importer Security Filing, will vehicles imported for personal use via Roll On/Roll Off Vessel be exempt from bond filing like Household Goods/Personal Effects.**

According to CBP, they will allow these types of shipments to be eligible for the “Type 3 HHG/PE” ISF coded transaction.

**11) Can I amend the bill of lading number on the ISF?**

Yes. From a transactional standpoint, the system will allow an ISF Filer to update an existing ISF with a new bill of lading number. However, the ISF Importer is ultimately responsible for the timely, accurate, and complete submission of the Importer Security Filing.

*Please pass this information along to all employees particularly operations staff and export clerks. We will continue to periodically update this information so please feel free to write in with any questions or comments. Please direct all questions or comments to Brian Limperopulos at [Brian.Limperopulos@IAMovers.org](mailto:Brian.Limperopulos@IAMovers.org).*

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