



THE NATIONAL ASSOCIATION OF
MARITIME ORGANIZATIONS (NAMO)

May 12, 2020

U.S. Customs and Border Protection
Department of Homeland Security

Re: Docket 1651-0019
Agency Information Collection Activities
Vessel Entrance & Clearance Statement

Dear Sir or Madam:

The National Association of Maritime Organizations welcomes this opportunity to comment on the information collection activities for CBP Form 1300 – Vessel Entrance & Clearance Statement. NAMO members are maritime associations representing, among others, ship agents who are frequently responsible to submit documents to CBP on behalf of their ocean carrier customers, including the 1300.

Prior to each vessel's arrival, the carrier has already submitted much of the information included on the 1300 via the electronic notice of arrival, and the agency's estimate of the burden does not adequately reflect or justify the duplicative nature of the information collection. Further, CBP has made great strides to automate the entrance and clearance process and electronic payment of vessel tonnage tax. Continuing to require paper documents when an electronic system is available places unnecessary time and cost burdens on both CBP and the trade in the form of document preparation, distribution, processing, and storage. Nor does the published 30-minute response time consider transportation to and from the Customhouse to deliver documents in areas where that is still required. In some cases, travel time can add two hours or more to the process.

Finally, the coronavirus-restricted conditions under which CBP and the U.S. trade community have been operating since March of this year have highlighted our ability to process information in non-traditional ways. CBP would be doing a disservice to itself, the commercial maritime industry, and the nation by reverting to and continuing to rely on outdated processes once operations are normalized.

To minimize the burdens outlined above, CBP needs to compare the information requested in the entrance/clearance process to that provided via the notice of arrival and revise processes to eliminate duplicate data requests. Further, CBP must complete the

Customs and Border Protection
Docket 1651-0019
May 12, 2020
Page 2

work it began by creating a portal in the Automated Commercial Environment system to allow vessel agents to undertake vessel and clearance processes electronically. Failure to do so renders the time and funds expended to create the electronic system a waste of public resources.

Thank you for the opportunity to comment on this matter.

Sincerely,

Association of Ship Brokers & Agents (USA), Inc.
Columbia River Steamship Operators Association
Connecticut Maritime Association
International Propeller Club
Jacksonville Marine Transportation
Louisiana Maritime Association
Marine Exchange of Puget Sound
Maritime Association of the Port of NY/NJ
Maritime Association of South Carolina
Maritime Exchange for the Delaware River and Bay
Virginia Maritime Association
West Gulf Maritime Association