

“10 + 2” Frequently Asked Questions

1) What are the data elements of the Importer Security Filing (ISF)?

There are 2 types of ISF filings – ISF10 and ISF5

ISF10

1. Seller
2. Buyer
3. Importer of record number / FTZ applicant identification number
4. Consignee number(s)
5. Manufacturer (or supplier)
6. Ship to party
7. Country of origin
8. Commodity Harmonized Tariff Schedule of the United States (HTSUS) number (6 digit)
9. Container stuffing location (must be filed no later than 24 hours prior vessel arrival)
10. Consolidator (must be filed no later than 24 hours prior vessel arrival)

ISF5 (FROB, IE and T&E cargo)

1. Booking party (Shipper under Phase One)
2. Foreign port of unloading
3. Place of delivery
4. Ship to name and address (First Notify Party)
5. Commodity HTSUS number (6 digit)

There are 2 additional message sets that must be filed by the carrier

Stow Plan (Baplie)

1. Vessel name
2. Vessel operator
3. Voyage Number
4. Container operator
5. Equipment number
6. Equipment size & type
7. Stow position
8. Hazmat code
9. Port of lading
10. Port of discharge

Container Status Messages (CSM's)

1. Event code being reported
2. Container number
3. Date and time of event being reported
4. Status of container (full or empty)
5. Location where event took place
6. Vessel identification

2) Who is responsible for the Importer Security Filing (ISF)?

- a. An ISF10 must be filed by the importer or the importer's nominated agent.
- b. An ISF5 must be filed by the carrier on BCO FROB cargo.
- c. An ISF5 must be filed by the party filing the NVOCC House B/L in AMS on FROB cargo.
- d. An ISF5 must be filed by the party filing the IE or T&E documentation with US CBP for BCO cargo.
- e. An ISF5 must be filed by the party filing the NVOCC House B/L in AMS for IE or T&E cargo.
- f. Stow plan data and container status messages must be filed by the carrier.

3) When must the filing be done?

- a. ISF10 and ISF5 for T&E, and IE cargo must be filed 24 Hours prior to loading at the POL for the vessel calling the US. (See exceptions to ISF10 in # 9 below)
- b. ISF5 for FROB cargo must be done prior to loading but not necessarily 24 Hours prior.
- c. Stow plan data must be submitted no later than 48 Hours after sailing from the last foreign port.
- d. Container status messages must be sent within 24 Hours of entry into the carrier's tracking system.

4) When is "10+2" going to be implemented?

Informed Compliance began on January 26, 2009. Importers and Carriers are required to make a good faith effort to be compliant. US CBP will show restraint in enforcement for the first 12 month period. Full enforcement with penalties is scheduled to begin on January 26, 2010.

5) What reference number is used by the Importer for their filing?

For BCO cargo, the carrier B/L number as manifested in AMS is used to reference the ISF by the importer. For NVOCC cargo, the House B/L number filed in AMS is used to reference the ISF by the importer. If the House B/L data has been filed by "K"Line on behalf of the shipper, the House B/L number used as reference in the ISF must be the "K"Line House B/L number.

6) When will the B/L number be issued?

“K”Line origin offices will either follow the scheme of booking number = bill of lading number OR a separate bill of lading number will be supplied at the time of booking. It will be the responsibility of the booking party to disseminate this bill of lading number to the proper party for ISF submission. The importer must verify with the exporter that the B/L number for the ISF filing is accurate based on cargo actually loaded.

7) Can the Carrier file the ISF10 on behalf of the Importer?

The ISF10 is completely separate from the 24 Hour Advance Manifest filing done by the carrier. Importers without a direct link to US CBP via EDI may choose to utilize a 3rd Party Provider to handle their ISF submission. The data may be submitted via either ABI (Automated Broker Interface) or AMS (Automated Manifest System). “K”Line subsidiary Century Distribution Systems will offer this service to both “K”Line and non-“K”Line customers. Please contact your “K”Line America, Inc. Sales Representative for additional information on ISF services through Century Distribution Systems.

8) Was “K”Line compliant with the carrier requirements on January 26, 2009?

Yes. “K”Line was a test carrier for submission of both the Stow Plan Data and Container Status Messages and has been voluntarily submitting this data since 2007. Phase One ISF5 filing will begin in July 2009.

9) Is an ISF required for all cargo or are there exemptions?

An ISF is required for all cargo subject to the 24Hour Advance Manifest rule and an ISF must be submitted 24 Hours prior to loading except FROB cargo which may be submitted any time prior to loading. Cargo currently exempt from advance manifest filing will receive the same exemption for timing of the ISF. Stow data and CSM’s are only required for containerized cargo.

10) Where can customers find “K”Line vessel schedule information to determine ISF filing dates?

Sailing schedules are available at www.kline.com. ISF submission should be completed a minimum of 24 Hours prior to the vessel’s posted ETA to the port of load.

11) Are importers still subject to the Cargo Data Declaration Charge (CDDC) since they must now submit an ISF directly to US CBP?

Yes. The CDDC fee charged by “K”Line covers the carrier required manifest under the 24 Hour Advance Manifest Rule. There is no change to this filing requirement and therefore the CDDC fee still applies as per the tariff or individual Service Contract terms.

12) What happens if cargo is rolled after the ISF has been submitted?

The ISF does not contain vessel/voyage information. As long as the cargo remains manifested against the same B/L number, the ISF does not need to be amended. If the change in vessel also results in a change to the B/L number, the ISF must be re-filed with the corrected B/L number.

13)What happens if a B/L is split?

The ISF filing is tied to the B/L number. Any change in B/L number will require an amendment of the ISF filing. Every B/L must have at least one ISF associated to it.

14)Where can customers find additional information about the 10+2 Security Filing Initiative?

Customers should be directed to www.cbp.gov. Information can be found under Trade/Cargo Security/Security Filing “10+2”

The direct link is:

http://www.cbp.gov/xp/cgov/trade/cargo_security/carriers/security_filing/