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## Software Developers Concerned Over Lack of Transition Procedures, Fallback Plans for ACE Statements Deadline

Software developers and customs brokers expressed concerns over the upcoming Dec. 9 deployment of statements in ACE, on an Oct. 6 conference call hosted by the National Customs Brokers & Forwarders Association of America. Though software developers reported that programming has been largely completed for some time, they said CBP needs to quickly issue transition guidelines and fallback procedures, especially given the widespread impact any issues with statements would have on trade.

The implementation guide software developers rely on to program ACE statements “has been locked down for quite a while,” though testing has been complicated by procedures that make it difficult for filers to participate, said Celeste Catano of software developer BluJay Solutions. Developers have to “doctor” existing messages to make them look like they came in the new ACE format, which is “not something that’s easily done,” Catano said. Not all customs brokers have testing systems either, she said.

A bigger concern may be as-yet unreleased transition procedures surrounding the Dec. 9 deadline, said software developers on the call. CBP sent out instructions for the hours surrounding the switch from ACS to ACE as the subsequently delayed January deployment of ACE statements approached, but policies for the new Dec. 9 date have so far not been forthcoming, said Fany Flores-Pastor of software developer Descartes. “We just need to make sure that gets readdressed, and that CBP provides good guidelines for that transition period,” Flores-Pastor said.

Some on the call even suggested that CBP create an artificial holiday on Friday, Dec. 8, to give the agency a period when no filing occurs while it transitions to the new system. Flores-Pastor said she doesn’t expect CBP to agree to that. Nonetheless, “everybody needs to understand that transition period. They did it before, they just need to do it again,” she said. Some developers said they would like the transition guidelines by 30 days before the Dec. 9 deadline so they have time for review.

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