

## ISF Crunch Time: Lessons You Can Apply with 22 Weeks to Go

### Webinar Questions and Answers

These questions were submitted during the live webinar event to the expert panel, featuring:

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Question	Response
What happens if my company is not compliant by the deadline?	You could be subject to penalties. If you do believe that this is probable, contact your Customs Account Manager now and communicate all your efforts to date. This will help you to mitigate any potential penalties that may be issued.
Do you think that Customs will extend the January 26 deadline?	All indications are that the deadline will not be extended. That doesn't mean that companies shouldn't be reaching out to their congresspersons with data on the potential financial damage that enforcement beginning January 28, 2010 will cause.
Will Customs really issue Do Not Load's if ISF's aren't filed?	CBP has stated that Do No Loads will not be issued under the ISF. CBP will issue Do Not Loads for security concerns outside of the ISF.
How long does it take to implement an ISF solution?	It really depends on the technology platform you choose, the solution approach, the complexity of your supply chain and good change management. You could get started within a few days for a manual e-filing solution. However, you may need to spend more effort and time to get the process in place to collect data manually. Timeframe for advanced solution may vary by technology platform & delivery model, but it is not uncommon to have 100's of suppliers and service providers on-boarded in matter of weeks (12-18 weeks) on an web based, on-demand platform.
Have unified filings become more popular? Should people advantage of the opportunity to combine the ISF and customs entry info?	About 3% of ISF filings are Unified Filings. This may be due to the lack of Unified Filing options from ISF filers. There are definite advantages to using the Unified Filing option - you ensure consistency of information and you reduce the number of times the same data must be shared. However, importers should be aware that ISF data sent via the Unified Filing can be used for Compliance Measurement.
Have unified filings posed any special challenge for software vendors?	More than a software or technology challenge, unified filing poses enormous data management & process challenges to collect enough information to perform unified filing. A more integrated solution approach that leverages data from supplier's trade documents, shipments (container manifest), can be utilized to enable your Broker to perform unified filing.
To Whom It May Concern, Has this presentation been approved for CCS credits?	The presentation has not been approved for CSS credits.
How accurate are the progress reports CBP provided to importers? What percentage of the industry is compliant with ISF?	The reports are accurate for what they measure, but they fail to provide the level of detail necessary to identify specific ISF filings and identify the issues. CBP has not provided any percentages with regards to industry compliance other than timeliness - we're currently at 46-47% timeliness for ISF filings.

<p>What constitutes on-time filing these days?</p>	<p>The Interim Final Rules states that ISF's must be filed 24 hours prior to lading on board a vessel at a foreign port. Since the Interim Final Rule was published, CBP has stated that the ISF must be filed 24 hours in advance of departure of the vessel from the foreign port of origin. If you load goods on a vessel that makes feeder stops prior to setting sail for the U.S. you must file your ISF when your goods are laden on board, not when the final feeder vessel leaves the final foreign port.</p>
<p>We see a significant issue for our overseas agents receiving timely and the correct AMS HBL number on LCL shipments co loaded through an NVO Any suggestions ?</p>	<p>I would recommend putting in place a documented process with your NVO that spells out how and when they provide the info to your agent. It should be very specific - create the form yourself if the NVO does not have one. Assuming the process will involve an emailed form of some sort, it might be a good idea to have them copy you for awhile on every transmission to make sure they are really doing it. If you continue to have problems, you may need to add language to your agreements with the NVO that holds them liable for penalties you incur due to late filings when they did not send the info as agreed.</p>
<p>what was the ACE report called again?</p>	<p>The report is AM-065 Cargo Entry Details and everyone should have an ACE Portal Account - its free!</p>
<p>My company does not currently ship by ocean but will sometime next year. We have not been able to "practice" ISF filings. What would your suggestion be to begin our journey into ocean shipping?</p>	<p>This is definitely a big challenge. You will have to be sure you have communicated extremely clear expectations with all the parties in your supply chain that you will need to provide the info to you or your filing agent. You should document those expectations with each party and make sure they all understand the risk of non-compliance in terms of the penalties that can be imposed. If you have not already, I would join C-TPAT, and then I would advise your Supply Chain Security Specialist and/or National Account Manager when you are starting to ocean ship and let them know the steps you have taken to try to be compliant. That will help you in the case of penalty mitigation if you DO end up with a non-compliant ISF.</p>
<p>Can you elaborate more on what is the cargo detail report number in ACE?</p>	<p>The report is AM-065 Cargo Entry Details and everyone should have an ACE Portal Account - its free!</p>
<p>Will Customs Be Providing a Web Portal to permit filing for the 10+2 similar to the FDA Prior Notice?</p>	<p>No. CBP does not have any plans to provide Web Portal filing. However, the software community has stepped up and there are lots of web based software solutions for filing ISFs.</p>
<p>Hi Beth, Could you pls repeat the name of the ACE report which allows us to determine ISF compliance?</p>	<p>The report is AM-065 Cargo Entry Details and everyone should have an ACE Portal Account - its free!</p>
<p>Can the trade community persuade Customs to provide detailed quality reports to importers and filers? The report cards we have seen so far do not show any entry number detail, which is essential to investigating problems and preventing further violations.</p>	<p>Right now the Progress Report are just for the Structured Review period. CBP does not intend to provide them once the enforcement phase begins. Since ISF is not a part of ACE, the ISF data will not be available in the ACE reports. Trade continues to press CBP on this issue stating that it is an Informed Compliance obligation that CBP provides the trade with information that enables us to be compliant.</p>
<p>Can you clarify the time requirements for the container stuffer and location information? I was under the impression that reporting 24 hrs before arrival was only acceptable during the interim period.</p>	<p>CBP has stated that "DHS will undertake an analysis of the elements subject to flexibilities" so its unclear whether the flexible timing and interpretation will be available after January 26, 2010. However, CBP has reported that very few ISF filers are taking advantage of this flexibility, so you should be prepared for losing it, since they may determine that it is not really a need that the trade community has.</p>

<p>I'm very glad to hear someone else is being really challenged with the "real" B/L#. That's our biggest issue, too, particularly with LCL cargo and co-loaded shipments.</p>	<p>Exactly. The key is making sure all the forwarders you are using know that you expect them to communicate the AMS House Bill (or sub-house bill if one exists) AND its SCAC to your ISF filer. We have instructed our NVO's to give it to shippers no later than 3 days before sailing to give us some cushion to turn the data around from our vendors to us.</p>
<p>If a container moves from one steamship line to another (new bill of lading issued), what gets filed for the ISF?</p>	<p>If you are assigned a new Bill of Lading, then you should cancel the original filing and file a new ISF under the new Bill of Lading number.</p>
<p>Would someone please address the fact that custom's is measuring compliance with filing ISF by 24 hours after first b/l is filed (prior to going on feeder vessel), instead of 24 hours prior to being loaded on vessel headed to US (Mother vessel) as regulations state.</p>	<p>Yes - you're right to ask us to address the fact that custom's is measuring compliance with filing ISF by 24 hours after first Bill of Lading is filed (prior to going on feeder vessel), instead of 24 hours prior to being loaded on vessel headed to US (Mother vessel) as regulations state.</p>
<p>Is the 24 hour deadline to file the ISF 24 hours from loading or sailing?</p>	<p>The Interim Final Rules states that ISF's must be filed 24 hours prior to lading on board a vessel at a foreign port. Since the Interim Final Rule was published, CBP has stated that the ISF must be filed 24 hours in advance of departure of the vessel from the foreign port of origin. If you load goods on a vessel that makes feeder stops prior to setting sail for the U.S. you must file your ISF when your goods are laden on board, not when the final feeder vessel leaves the final foreign port.</p>
<p>Is the info. from the ISF crosschecked with what the Steamship Line manifests? If so, and shipment is being shipped by an NVO that is not AMS, Would ISF info. be invalid?</p>	<p>The theory is that CBP will do the cross checking. But that should not negate the ISF filing. This is why it's so critical to get that "real" BOL - the one the NVO is using internally is NOT the one CBP is expecting to match up to in AMS.</p>
<p>Are the steamship lines required to get the OBL information to the shipper in a timely fashion so that the ISF information does match up when filed?</p>	<p>There are no regulatory requirements. However, CBP has asked importers to advise them of steamship lines or forwarders that do not provide this information in a timely manner.</p>
<p>What was the ACE report id?</p>	<p>The report is AM-065 Cargo Entry Details and everyone should have an ACE Portal Account - its free!</p>
<p>What type of costs are importers seeing for a typical filing?</p>	<p>While the original "scare stories" last year were estimating this to run to \$100 or more, by now most importers are paying somewhere between \$15 and \$50. If they are able to provide any/all data electronically, that price drops. If you use a 3rd-party software tool and file the ISF's yourself, you can drop the price to less than \$5 per ISF.</p>
<p>Is it not worth negotiating with your forwarders for them to file ISF?</p>	<p>Our forwarders could not have offered us pricing as competitive as what it will cost us by moving all the data electronically from our vendors all the way through to the filing. We probably would have paid at least \$20-\$40 per ISF, and we are going to pay less than \$5 by choosing to self-file. We also preferred having control of all our ISF's in one place, rather than spreading the filings across multiple parties.</p>

Challenge: CBP will not answering individual ISF questions, but rather uses periodic FAQs to post answer to selected questions/topics. Since this doesn't our specific questions (and our CBP Acct Mgr can't/won't answer), it's challenging to have an accurate solution put in place. Any chance CBP info-sourcing will improve in the future ?	This is a huge challenge and I don't see it changing anytime in the near future.
Is a copy of the NAM study available	The NAM comments on the 10+2 Interim Final Rule provide some great numbers on the cost of ISF <a href="http://www.nam.org/~media/Files/PDF/2008%2008/comments.ashx">http://www.nam.org/~media/Files/PDF/2008%2008/comments.ashx</a> .
what strategy is C&B taking on DDU moves ?	We don't purchase anything DDU, but we do purchase goods DDP, and we did have to address this. Since the interpretation of who is the "ISF Importer" is a little unclear, we have had to establish that all our DDP vendors understand and agree that, as the importer of record, THEY are the ISF Importer, not us.
to Beth: ACE-AM what? to get the container report	The report is AM-065 Cargo Entry Details and everyone should have an ACE Portal Account - its free!
Is there an expectation that at some point freight will not get loaded on planned vessel in absence of timely ISF filing?	CBP has stated that Do No Loads will not be issued under the ISF. CBP will issue Do Not Loads for security concerns outside of the ISF.
any final decision on bond requirements?	At this time CBP has established the ISF bond at \$10,000. That's the only update that I've heard.
Is there any truth to the claim that CPB is not estimating the timeliness of filings accurately? I've heard that even if the filing is done on time, CBP may be reporting it as late.	There have been cases where CBP has identified an ISF filing as late where it can be proven to be a timely file. I have many questions on CBP's reporting.
To Virginia - how are you grading your forwarders/agents on ISF performance?	Our forwarders must meet two criteria - provide the AMS BOL/SCAC and (when necessary) Stuffing Location to our vendors and do it at least three days before sailing. We are allowing them to suggest the method that they feel works best operationally for their company to meet these two criteria. If we find that we have chronic problems with one NVO, we will require a specific way of communicating the info. At this time, we have not advised our NVO's that we will consider them liable for the fines if they are incurred due to their failure to provide the info, but I can see going to that step at some point in the future if we have problems. We HAVE advised our vendors that they will be liable if we cannot file a timely/accurate ISF due to their failure to send the ASN.
Unified entries are a problem - forwarders can't provide BL copy, and broker needs data on that BL (carton count, container#, etc.) to make the entry. Is anyone else having this challenge?	Yes, collecting enough information to create the CF-7501 is proving challenging, which may account for the fact that only 3% of ISF's are Unified Entry filings.
Is Crate and Barrel considering Unified option, what do they see as the pros and cons..	We are not considering the unified filing option because a majority of our shipments will be destined for FTZ-activated DC's by the end of this year. While one can do a unified ISF and FTZ Admission, we admit goods under Direct Delivery privileges and so we prefer to make our admissions after the goods are posted to our ERP.

<p>How often can you amend an ISF? We had 1 OBL - 3 containers with POA of SEA. 2 of the containers were left on board the vessel and sailed to Vancouver and a new OBL was cut for them leaving 1 container on the original OBL. What could be done without drawing the wrath of CBP?</p>	<p>I can't promise you won't draw CBP's wrath, but I would amend the ISF to remove any party/HTS/COO data that was tied only to the two containers that were left on board. This amendment has to happen 24 hours or more before you hit SEA. Then I would file a new ISF (but an ISF-5) for those containers that ended up terminating in Vancouver. Yes, it will be late, but it should qualify as the "out of your control" mitigating factor.</p>
<p>does anyone on the panel know what CBP is comparing the ISF to in determining penalties, release or entry? if entry, does CBP expect amendments to be filed to ISF after landing if the final 7501 release contains diff't HTS for example.</p>	<p>No, CBP has not provided any detail on their penalty analysis. But, since their process has been described as manual, I do question the amount of research that CBP will be able to do given the anticipated volume of potential violations. CBP only expects amendments up until arrival at the first U.S. port of arrival.</p>
<p>Any idea when CBP will start using date of sailing as an additional measurement on the report cards?</p>	<p>Unfortunately not.</p>
<p>Does anyone know when CBP will start showing the gaps on the ISF progress reports - i.e., ocean shipments where ISF was not filed, rather than just measuring timeliness?</p>	<p>Unfortunately not and the concern is that the progress reports will be going away when the structured review period goes away.</p>
<p>does anyone know of the 1600 filers how many are brokers, direct filers or Logistics providers?</p>	<p>Unfortunately not.</p>
<p>How soon do you think it will be before ISF is mandated for air shipments?</p>	<p>CBP has stated that it has no intentions of implementing ISF for air shipments. The Interim Final Rule is for Ocean shipments only and it would take an act of Congress to change that. However, since some other countries (like Canada) are planning for their own version of 10+2, and it likely WILL include other modes of transportation, I would not be surprised if we see ISF for air in the U.S. in future years.</p>
<p>My understanding is that CBP is looking for container unload location in the "Ship To" field. How are importers who might dynamically allocate inventory or sell goods at port of entry (in container) handling this unknown at time of vessel lading? Will CBP be flexible?</p>	<p>I hadn't heard of this. But if they do, I don't think this is a huge concern because you're required to provide the best information available at the time of ISF filing. If you don't know the actual container unload location until the goods have landed then you're outside of the ISF amendment period.</p>
<p>I understand that there is a \$10k maximum penalty per ISF transmission (for multiple errors on one filing, I heard Beth say \$5000. Has there been a change?</p>	<p>CBP has said that the maximum penalty per ISF filing is \$10,000. This is based on the \$5,000 penalty per violation. As an example, an ISF could be untimely and inaccurate which would incur a \$5,000 penalty for being late and a \$5,000 penalty for being inaccurate.</p>

<p>CBP progress reports use BL date which is not the correct date, it should be 24 hours before load on vessel. When will customs start using the load on board date?</p>	<p>I don't believe that CBP can actually access the "load on board" date so the bill of lading date is the next best thing. Unfortunately, this poses a huge problem because the Bill of Lading date does not represent the date of lading on board. This does however provide the Trade with an opportunity to challenge any CBP penalties for late filings.</p>
<p>for US goods returned, are people using HTS codes of 9801 or the actual HTS of the product?</p>	<p>CBP has asked that you report both.</p>
<p>Do you think Customs will start sending the report cards directly to the Importer instead of just the filer</p>	<p>Since CBP only plans on issuing the Status Reports during the Structured Review Period it is not expected that the progress reports will make it to all ISF importers.</p>
<p>How can customs access penalties come Jan. 26, 2010, when they have shown, via report cards, that they are not measuring by the regulations published by custom's for ISF?</p>	<p>That is the going to be a significant way that the Trade can challenge CBP penalties. By showing that they aren't measuring ISF's by the standards outlined in the Interim Final Rule. I think that CBP may change these criteria as part of the issuance of the Final Rule.</p>
<p>Do you see an eventual impact on C-TPAT towards mandatory vs voluntary (today) due to the relationship to ISF as a mitigating factor?</p>	<p>I still don't see C-TPAT becoming a mandatory program because Customs wants the ability to restrict/control membership.</p>
<p>Are we getting a true measure of timeliness on the progress reports or is it based off of the AMS filing?</p>	<p>It appears that the timeliness on the Progress Reports is based on the Bill of Lading date which can be much earlier than 24 hours in advance of lading on board the vessel.</p>
<p>What type of protection within a LC can a importer place to protect and push back potential fines.</p>	<p>The Letter of Credit could be an excellent tool to enforce ISF compliance and deflect penalties. I would recommend working with your banker to work on the right terms to use. Assuming you are using documentary L/C's, you will want to come up with a way to show on one or more documents that the vendor complied with what you require of them for ISF. Pushing back penalties could be trickier, since they may not be known at the time that the documents are settled unless you do not have sight terms.</p>
<p>For Virginia: Have you had to add staff to monitor the ISF or can you handle this burden with your current staff?</p>	<p>After this year (when our man-hours needs have been higher), we anticipate ISF requiring approximately 10 man-hours per week, so we have not added staff for this reason alone.</p>
<p>what types of enforcement have you put in place with suppliers to ensure that ASN data is provided?</p>	<p>Our ASN tool sends out automatic email messages when ASN's will be due shortly and when they are late, based on P.O. ship date to help them remember to file the ASN's. For cases of non-compliance, we have added language to our Vendor Operations Guide advising that vendors will be liable for ISF penalties if they were incurred due to late/inaccurate ASN's.</p>
<p>What was the report under ACE that Beth said she could drill down to get the number of shipments that should have had ISF filed on?</p>	<p>The report is AM-065 Cargo Entry Details and everyone should have an ACE Portal Account - its free!</p>

From a technology perspective can GT Nexus comment on the ability to create a standard ISF data exchange set to streamline data exchange between vendors, importers, and ISF filers. The alternative as mentioned earlier is a vendor having to manage 300 different ISF instructions from 300 different importers.	By its very nature, ISF requires collaboration beyond the four walls of an importer and it needs a mechanism to augment data from internal systems, with transaction level data from trading partners beyond your 4-walls (mainly at origin: directly from suppliers and from 3rd party logistics service providers). Instead of creating a one-off/stand-alone data stream just for ISF, a more sustainable, standard and scalable approach would be to integrate ISF data collection into existing supply chain processes e.g. collect data elements provided by importer's via importer issued purchase orders, have suppliers create factory ASN's and standard trade documents leveraging and augmenting data provided in the purchase order (e.g. verify 'manufacturer name and address', 'container stuffing location' for factory loaded containers for ISF), and have origin logistics provider augment BL# and generate prep-ISF message as a natural extension of the shipment execution process they already manage as normal course of business.
What was the name of the ACE Portal report that Beth suggested importers run to see the shipments where they should file ISF. It was AM???	The report is AM-065 Cargo Entry Details and everyone should have an ACE Portal Account - its free!
What does ACE stand for?	Automated Commercial Environment - there's a lot of information on ACE at <a href="http://www.cbp.gov/xp/cgov/trade/automated/modernization/ace/">http://www.cbp.gov/xp/cgov/trade/automated/modernization/ace/</a> .
will we get penalty for getting the wrong bill of lading# but with the correct container# from CBP?	It's a possibility. But you can mitigate any penalty by proving that you were provided with incorrect data.
Is ISF for the IOR only or the person who is receiving the shipment?	The ISF Importer is the person who causes the import to occur. I'd need more detail on your particular situation to be able to specifically answer your question.
what is the virgin islands consider for the ISF foreign or US?	The U.S. Virgin Islands are considered a territory of the U.S. and do require ISF filings.
Will the ISF be refused if it does not have the correct HTS#?	The ISF will be rejected if the HTS is an invalid HTS number. It will not be rejected if the HTS is not correct for the item being imported.
I have heard two different theories in ISF filing during this burn in period 1. to have all the data elements when filing your ISF or 2. File the elements you do have to see where you have gaps. Is one approach better than the other?	Yes, I recommend filing everything so that CBP doesn't target you early on for incomplete data.
How is C&B holding their vendors accountable for lack of information for filing? My company is advising that they'll be responsible for entire penalty cost + potential of being removed as a certified vendor.	We have added language both to our Vendor Operations Guide and the training tool for our portal where ASN's are entered advising that vendors will be liable for ISF penalties if they were incurred due to late/inaccurate ASN's. We have not included anything about being removed as a validated member (that's certainly a way to motivate your suppliers, but it may be hard to get your buyers to accept).
Is there a way to assess the benefits of being C-TPAT certified, as it relates to ISF?	There are a few benefits that C-TPAT membership affords ISF filers. First, C-TPAT members are receiving ISF messages directly from CBP. Secondly, Tier 3 C-TPAT members receive their Progress Reports directly from CBP. CBP always points out also that by filing your ISF, and letting CBP know that a C-TPAT member is the IOR for this shipment, you will lower your likelihood of being pulled for an exam at origin or destination.

<p>When filing ISF, we have action reasons CT (compliant info) FR (flexible range) FT (Flexible Time) Can you advise how you initially file an ISF when you know you will need to update information such as Container Stuffing Location?</p>	<p>CBP instituted a requirement to file FR and FT transactions if you knew you were using these criteria. This is a way for CBP to collect data on how many companies are using the flexibilities afforded during the structured review period. You can file amendments at any time, regardless of whether you have filed FR and/or FT in your initial transaction. I hope that people do use the FR/FT filings so that CBP can see how important these are to the Trade. But failure to file FR/FT will not restrict your ability to file amendments.</p>
<p>We were told that the party causing or benefiting from an import is the party responsible for any penalties even if the terms are DDP (everything paid by the supplier) Is this true?</p>	<p>That is my understanding as well. VT's response: I think this is a very gray area, but in my experience, most vendors selling DDP are accepting that, as the IOR, they are also the ISF Importer, but it certainly is something you need to clarify with your DDP vendors.</p>
<p>What if your cargo is transloaded before heading to the US? Is it still the original port of loading?</p>	<p>Assuming you mean that the goods are transshipped at another foreign port before sailing for a final destination in the U.S., yes, you have to file your ISF 24 hours before they leave the FIRST foreign port.</p>
<p>Is this 24 hour requirement for bulk freight or just container shipments?</p>	<p>The ISF is required for all ocean imports other than bulk freight. The ISF includes non-containerized freight and roll-on, roll-off freight.</p>
<p>What was the timing that Crate &amp; Barrel mentioned of when she considers documents filed on time for ISF? I'm sorry, I missed that</p>	<p>The timing we are enforcing with our forwarders is to give the AMS BOL info to our vendors no later than three days before the vessel sails. Then, the vendors are instructed to file the ASN that same day (also no later than 3 days before sailing). That allows us to get the ASN data next business day (in the U.S.) and get it filed, which should mean filing 2 days before sailing. Based on how CBP now says they are measuring timeliness, that gives us a one-day cushion.</p>
<p>What is the definition of Ship To on the ISF filing?</p>	<p>The definition of the ISF Ship To Party is Name and address of the first deliver-to party scheduled to physically receive the goods after the goods have been released from customs custody.</p> <p>CBP is looking for the actual deliver to name/address; not the corporate address If unknown, provide the name of the facility where the goods will be unladen. May provide a FIRMS code of a warehouse or terminal if the specific ship to name/address is unknown at the time of the filing. For example, a container freight station is acceptable. May provide the name and address of an in-land distribution center if the specific ship to name/address is unknown at the time of the ISF filing. A widely recognized commercially accepted identification number for this party may be provided in lieu of the name and address. CBP will accept a DUNS number in lieu of the name and address.</p>
<p>if cargo ships from Bangladesh as example, to connect with the mother, the ISF needs to be filed from Bangladesh?</p>	<p>Yes, you would need to file your ISF 24 hours in advance of lading on board the vessel in Bangladesh.</p>
<p>so what's the motivation for filing an amendment if it can cause a penalty??</p>	<p>Filing an amendment can also help you avoid penalties. As an ISF importer, you are required to update your ISF filing with information as it becomes available. If you fail to do so and CBP can prove that your ISF was inaccurate due to that fact, you may be liable for a penalty. In addition, the mitigating factors just announced by CBP should protect you from an extra penalty for filing an amendment, since they will take only the most recent filing of the ISF to be the one they judge compliance on.</p>

<p>Should we even file an amendment if we are going to get a penalty for incorrect filings?</p>	<p>Filing an amendment can also help you avoid penalties. As an ISF importer, you are required to update your ISF filing with information as it becomes available. If you fail to do so and CBP can prove that your ISF was inaccurate due to that fact, you may be liable for a penalty. In addition, the mitigating factors just announced by CBP should protect you from an extra penalty for filing an amendment, since they will take only the most recent filing of the ISF to be the one they judge compliance on.</p>
<p>In the example case you mentioned earlier; that is where no ISF was filed, Customs does not issue a Do Not Load, allows the shipment to discharge and then will not issue a clearance until the ISF is filed..... will that create an automatic \$5000 fine for being late?</p>	<p>We're not sure if CBP will be issuing automatic ISF penalties for no files. I would think that would be an easy target for them.</p>