

APPENDIX 3

At the October 4, 2011, public meeting, COAC voted and approved the following seventeen (17) recommendations from the Role of the Broker subcommittee:

1. The Broker Regulatory Revision Work Group should be expanded to include interested parties representing other perspectives.
2. Promulgate uniform regulations regarding vetting of a power of attorney to ensure consistency, uniformity, and as a guard against identity theft, inaccurate use, fraud and terrorism.
3. CBP should recognize the broker's role as a communicator and as a force multiplier to increase compliance, especially for small and medium-sized importers.
4. To better protect the rights of an importer, nothing should prohibit direct connectivity to an importer's broker and entry filing.
5. CBP must aggressively pursue action to deter illegal and unscrupulous acts with emphasis on foreign parties.
6. CBP should take into account the quality of work performed by brokers which today goes unrecognized. This would allow CBP to better focus their resources.
7. Both CBP and the public must always know who is licensed, authorized to transact business, and certified, in an up-to-date real-time environment.
8. CBP must continually update their regulations to account for modern business practices and to align with the electronic environment.
9. Customs business should be solely conducted within the territory of the United States.
10. Give priority to finalizing and funding ACE.
11. Develop a continuing education curriculum to ensure competency and enhance professionalism in affairs involving trade, compliance, and Customs matters.

12. Establish some form of recording continuing education which may include self-reporting with periodic verification by CBP.
13. To compete in world trade, the U.S. education system must be enhanced to include world-class training in trade, compliance and Customs matters
14. The existing license structure and requirements should continue to apply to all parties.
15. Some measure of practical experience should be considered prior to the issuance of a permit to conduct business on behalf of the public.
16. 19 USC 1641 is well-crafted and it remains crucial to preserve due process, along with reasonable and uniform application.
17. Customs brokers, and others known to be trade experts, should be recognized by CBP for their ability to pre-certify C-TPAT and/or ISA applicants.