



UNITED STATES COUNCIL FOR INTERNATIONAL BUSINESS

Peter M. Robinson
President & CEO

June 23, 2011

Alan D. Bersin
Commissioner
United States Customs and Border Protection
U.S. Department of Homeland Security
1300 Pennsylvania Avenue, NW
Room 4.4A
Washington, DC 20229

John S. Pistole
Assistant Secretary/Administrator
Transportation Security Administration
U.S. Department of Homeland Security
East Building
601 South 12th Street
Arlington, VA 20598

Dear Commissioner Bersin and Administrator Pistole:

I am writing on behalf of the United States Council for International Business (USCIB) to urge heightened cooperation between CBP and TSA to improve protocols and rules of engagement for the air cargo security program, to leverage existing programs, to ensure flexible data sharing, and to assess the regulatory environment in other countries before implementing new air cargo security rules.

USCIB commends CBP and TSA for working with the private sector to implement protocols and rules of engagement for the air cargo security program, and hopes that the heightened interagency cooperation will continue to ensure a streamlined program.

Although CBP recently suggested increasing the number of countries in the pilot program from 28 to 42 countries to include France and all of Africa, we urge that any increase be done with significant private sector consultation to ensure the proper consideration of issues such as timing and availability of information, volume of shipments for each country, as well as data privacy rules and regulatory hurdles in each country. USCIB urges CBP and TSA to assess the regulatory environment in other countries before increasing the scope of this pilot program.

Further, we believe that leveraging existing security programs will be a key element in the creation of a streamlined air cargo security program in which CBP and TSA work together to ensure trade facilitation and security.

Finally, flexible data sharing is essential to maintaining a harmonious security program administered by two agencies. Accordingly, USCIB encourages CBP and TSA to internally coordinate data exchange rather than requesting duplicative information from the private sector. For example, if audited by CBP, a shipper should not be required to repeat the process with TSA.

While we wholeheartedly support the security mission of both agencies, USCIB requests that CBP and TSA consider the crucial trade facilitation components of a comprehensive air cargo security program.

Sincerely,

Peter M. Robinson