

## Justification for No Material/Nonsubstantive Change

Since 2000, the Service has allowed for the electronic transmission of data elements representing Form 3-177 and the upload of electronic images of documents, including licenses and permits where appropriate, via the Service's electronic declaration filing system (eDecs). Certain licenses and permits must be submitted in original paper as required under other regulations even if uploaded in eDecs for review prior to importation or exportation.

As the Service moves forward with implementation of the International Trade Data System (ITDS), under Executive Order 13659 Streamlining the Export/Import Process for America's Businesses (79 FR 10657, February 25, 2014), we wish to ensure that the public is aware of their ability to submit Form 3-177 as a set of electronic data elements and certain documents as electronic data sets or images in lieu of filing a paper form or paper documents and to provide information electronically to demonstrate any exemptions to filing of Form 3-177. This information can all be filed through either eDecs or through a CBP-approved electronic data interchange (EDI) such as the Automated Commercial Environment (ACE), part of ITDS. This electronic ability will facilitate the movement of imports and exports under the Service's broad inspection authority.