

Department of Commerce
U.S. Census Bureau
OMB Information Collection Request
Automated Export System (AES) Program
OMB Control No. 0607-0152

A. Justification

1. Necessity of the Information Collection

The Census Bureau requires mandatory filing of all export information via the Automated Export System (AES). This requirement is mandated through Public Law 107-228, Title XIV, Section 1404(b) of the Foreign Trade Relations Act of 2003. This law authorizes the Secretary of Commerce with the concurrences of the Secretary of State and the Secretary of Homeland Security to require all persons who file export information according to Title 13, United States Code (U.S.C.), Chapter 9, to file such information through the AES.

The clearance under Office of Management and Budget (OMB) Number 0607-0152 covers the Automated Commercial Environment (ACE) *AESDirect* Record Formats (Attachment A) and related documents, including the AES Letter of Intent (Attachment B), ACE Exporter Account Application and Quick Reference Guide (Attachment C), AES Certification Statements (Attachment D), the ACE *AESDirect* User Guide (Attachment E), Preliminary Steel Report (Attachment F), and Public Comments (Attachment G). The AES Program was approved on April 30, 2023 for three years. With this submission, the Census Bureau is requesting continued clearance of the AES program as a result of the publication of a final rule in the federal register on August 10, 2023 ([Federal Register :: Foreign Trade Regulations \(FTR\): State Department Directorate of Defense Trade Controls Filing Requirement and Clarifications to Current Requirements](#)) adding a conditional data element to the AES called the Directorate of Defense Trade Controls Category XXI Determination Number. The final rule will require on the effective date of November 8, 2023 AES filers (the U.S. Principal Party in Interest (USPPI) or the authorized agent) to report the DDTC Category XXI Determination Number only when the DDTC United States Munitions List (USML) Category XXI is selected in the DDTC USML Category Code field in the AES. In calendar year 2022, 156,195 (0.6%) AES records consisted of USML Category XXI commodities.

The AES is the primary instrument used for collecting export trade data, which are used by the Census Bureau for statistical purposes. The AES provides the means for collecting data on U.S. exports. Title 13, U.S.C., Chapter 9, Sections 301-307, mandates the collection of these data. The regulatory provisions for the collection of these data are contained in the Foreign Trade Regulations (FTR), Title 15, Code of Federal Regulations (CFR), Part 30. The official export statistics collected from these tools provide the basic component for the compilation of the U.S. position on merchandise trade. These data are an essential component of the monthly totals provided in the U.S. International Trade in

Goods and Services (FT-900) Press Release, a principal federal economic indicator, and a primary component of the Gross Domestic Product. The published export data enable the private and public sector to develop practical marketing strategies as well as provide a means to assess the impact of exports on the domestic economy. These data are used in the development of U.S. government economic and foreign trade policies, including export control purposes under the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852. The Bureau of Industry and Security (BIS), U.S. Customs and Border Protection (CBP), and other enforcement agencies use these data to detect and prevent the export of certain items by unauthorized parties to unauthorized destinations or end users. This information is noted in the *ACE AESDirect* User Guide located in Attachment E.

In order to publish accurate export trade statistics, the Census Bureau is responsible for maintaining the FTR, which implements the provisions for filing export information in the AES. In addition to the publication of the FT-900, the Census Bureau releases data on imports of steel mill products in advance of the regular monthly trade statistics release. This exception to the normal procedure was initially approved by the OMB in January 1999 and had been subsequently extended annually through means of a separately submitted memo. This exception has permitted the public release of preliminary monthly data on imports of steel under the provisions of the OMB's Statistical Policy Directive No. 3 on the Compilation, Release and Evaluation of Principal Federal Economic Indicators. With the revision to the AES Program in 2019, the Census Bureau eliminated the need for an annual approval from OMB since it is included in the Information Collection Request (ICR). See Attachment F for the Preliminary Report on U.S. Imports for Consumption of Steel Products.

Additionally, the Census Bureau issued a NPRM on December 15, 2021 to propose the addition of a conditional data element, country of origin in the AES, and to make remedial changes to the FTR to improve clarity of the AES reporting requirements while correcting any errors. The proposed rule would require AES filers (USPPI or the authorized agent) to report the country of origin only when foreign origin goods are exported. In calendar year 2021, 12.5 million AES records (27.5 percent) consisted of foreign origin commodities. At this time the Census Bureau is still reviewing the comments received. At the conclusion of the review, the Census Bureau will weigh the statistical need of the data to the overall impact this change will have on businesses in the export trade community in order to make a final decision on whether to add the new field. If it is determined that the Census Bureau will move forward with the addition of the country of origin, then a revision to the ICR will be made and an opportunity for comments will be provided. It is critical for the Census Bureau to ensure that any revisions made to the FTR will allow for the continued collection and compilation of complete, accurate and timely trade statistics.

2. Needs and Uses

The information collected via the AES conveys what is being exported (description and commodity classification number); how much is exported (quantity, shipping weight, and value); how it is exported (method of transport, exporting carrier, and whether

containerized); who the parties to the transaction are (USPPI, authorized agent, and intermediate and ultimate consignees); from where (state of origin and port of export); to where (port of unloading and country of ultimate destination); and when a commodity is exported (date of exportation). Profile information on the USPPI and the authorized agent provides a contact for verification of the information.

The data collected from the AES serves as the official record of export transactions and is used by the U.S. Federal Government and the private sector. The Federal Government uses every data element in the AES. The mandatory filing requirement of the export information in AES enables the Federal Government to produce more complete, accurate and timely export statistics. The Census Bureau delegated the authority to enforce the FTR to the BIS's Office of Export Enforcement along with the Department of Homeland Security's CBP and Homeland Security Investigations (HSI). The mandatory use of the AES also facilitates the enforcement by the BIS of the Export Administration Regulations for the detection and prevention of exports of national security sensitive commodities to unauthorized destinations; the enforcement by the CBP of the U.S. Department of State's International Traffic in Arms Regulations for the exports of defense articles; the validation by the Census Bureau of the Kimberly Process Certificate for the exports of rough diamonds; and enforcement and compliance by other federal agencies (i.e., Environmental Protection Agency, Drug Enforcement Agency, etc.) of regulations pertaining to export requirements.

Other Federal agencies use these data to develop the components of the merchandise trade figures used in the calculations for the balance of payments and Gross Domestic Product accounts to evaluate the effects of the value of U.S. exports; and to prepare for and assist in trade negotiations under the General Agreement on Tariffs and Trade. Collection of these data also eliminates the need for conducting additional surveys for the collection of information because the AES shows the relationship of the parties to the export transaction (as required by the Bureau of Economic Analysis (BEA)). The Bureau of Labor Statistics also uses the AES data as a source for developing the export price index and by the U.S. Department of Transportation for administering the negotiation of reciprocal arrangements for transportation facilities between the U.S. and other countries. Additionally, a collaborative effort amongst the Census Bureau, the National Governors' Association and other data users resulted in the development of export statistics requiring the state of origin to be reported on the AES. This information enables state governments to focus activities and resources on fostering the exports of goods that originate in their states.

The International Trade Administration relies heavily on the preliminary import statistics of steel mill products provided by the Census Bureau. As a part of the Government's steel initiative, the Department of Commerce was instructed by the Administration to monitor steel imports. The early release of preliminary statistics on steel mill imports allows the steel industry to identify trends and potential shifts in trade patterns and take appropriate action. A variety of parties, including government officials and the public with an interest in imports of steel products continue to use this monitoring system heavily. The FTR, Subpart F addresses the general requirements for filing import entries

with CBP in the ACE in accordance with 19 CFR, which is the source of the import data on steel mill products.

Export statistics collected from the AES aid private sector companies, financial institutions, and transportation entities in conducting market analysis and market penetration studies for the development of new markets and market-share strategies. Port authorities, steamship lines, airlines, aircraft manufacturers, and air transport associations use these data for measuring the volume and effect of air or vessel shipments and the need for additional or new types of facilities.

The implementation of quality standards is an integral part of the pre-dissemination review by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). In addition, information quality is incorporated into the clearance process required by the Paperwork Reduction Act.

3. Use of Information Technology

The AES was developed jointly by the Census Bureau and CBP to provide a paperless method for reporting export information. AES is an information gateway for both the Census Bureau and CBP to improve the timeliness and accuracy of export trade statistics, improve customer service, and ensure compliance with and enforcement of export laws.

In calendar year 2021, 20,640 AES filers submitted export information for 277,489 USPPIs. These AES submissions represented an average of 1,418,671 export records monthly which is 100 percent of non-Canadian export transactions. AES filers are not required to submit AES records for exports to Canada, except for shipments that are license-controlled, contain rough diamonds, used self-propelled vehicles, or are enroute through Canada destined for a third country. Under the terms of a Memorandum of Understanding (MOU) with Canada, the Census Bureau uses Canadian import data as a replacement for U.S. export information. Including automated Canadian data, the Census Bureau receives all of its information from electronic sources. The AES improves the completeness, accuracy and timeliness of processing trade statistics. In the AES, system edits prohibit invalid and impossible data entry and AES filers must make corrections before these data are accepted and processed. As a result, AES records have less than two tenths of a percent error rate.

4. Efforts to Identify Duplication

Executive Order 13659, *Streamlining the Export/Import Process for America's Businesses*, was issued on February 19, 2014 in an effort to prevent duplication through the development of the International Trade Data System (ITDS). The ITDS allows AES filers to electronically transmit data required by federal agencies for imports and exports through the ACE, the single portal system, "single window." In 2014, the AES was migrated to the ACE, to update the system's technology and platform while complying with Executive Order 13659.

Additionally, the Census Bureau supports the development of the Electronic Export Manifest (EEM) by CBP. It is important that the responsibilities of the USPPI and the carriers are clearly defined to ensure that the export data is filed by the appropriate party to prevent receiving duplicate transportation data. The EEM would give CBP advanced electronic export manifest data from carriers and may improve the Census Bureau's accuracy of transportation information reported in the AES, such as port of export, date of export, carrier identification, method of transportation and foreign port of unloading that is currently provided by the USPPI.

In order to prevent duplication, the Census Bureau maintains ongoing contact with other federal agencies involved in collecting information on export or export control functions. The Census Bureau has representatives on various advisory committees and working groups to ensure that export data collected by the Census Bureau are not duplicated by other agencies and that the agencies who use the export data collected in the AES adhere to the Census Bureau's statutory and regulatory guidelines on access, use, release, and confidentiality. For example, the Census Bureau is supporting CBP with the development of the EEM. In doing so, the Census Bureau and CBP are ensuring that transportation elements (such as port of export, date of export, carrier identification, method of transportation and foreign port of unloading) are filed by the party with the most knowledge of those data elements. In addition, the Census Bureau monitors policy and regulatory changes being made by other federal agencies to ensure that they comply with the guidelines listed above and do not duplicate information currently being collected by the Census Bureau.

5. Efforts to Minimize Burden

The AES is accessible via a free Internet application, called *ACE AESDirect*. The *ACE AESDirect* provides online registration (*ACE Exporter Account Application*) and a user guide which aids users in filing export information electronically. *ACE AESDirect* also provides users the capability to recall a previous record for use as a template to create subsequent records. The Census Bureau has developed numerous resources to help educate users through webinars, training, and online videos.

The data fields from the AES are edited up-front to provide complete, timely, and accurate export information and transportation data for use by the Census Bureau, CBP and other federal agencies through the single window *ACE*. For example, if an AES filer reports information in the AES and encounters a fatal error, the AES filer must correct the fatal error immediately, otherwise the AES will not accept the transaction and not issue a proof of filing citation back to the AES filer. Through the same single window *ACE*, the export trade community may also access the data they submitted or had submitted on their behalf to AES to audit and conduct data reviews to measure compliance with export laws and regulations.

Several agencies including the Census Bureau, CBP, BIS, and the State Department are involved in an extensive outreach and education effort to ensure that the export trade community is aware of the export filing requirements to improve reporting compliance.

The Census Bureau also works closely with private organizations and trade associations to provide additional educational opportunities to those involved in the export process. Additionally, the Census Bureau has ongoing efforts to inform the export trade community about new system updates and regulatory changes that can affect business operation practices. As a result of these efforts, the following tools are made available: (1) the Global Reach blog; (2) webinars/seminars, which provide training on new regulations, changes to filing requirements, and commodity classification; and (3) updated user guides which detail proper procedures for creating, transmitting, printing and deleting the AES record, and retrieving the AES record to verify and/or update export information. The Census Bureau engages in extensive outreach to increase compliance and improve the quality of information filed in the AES. Currently, 98.7% of AES filers have a compliance rate of 95% or higher.

Additionally, the Census Bureau eliminates the filing of over eight million AES records annually through a MOU with Canada. The MOU is signed by the Census Bureau, CBP, Statistics Canada, and Canada Border Services Agency and authorizes the Census Bureau to use Canadian import data as its U.S. export information to Canada in exchange for U.S. import data that Canada uses as its Canadian export information to the United States.

6. Consequences of Less Frequent Collection

Less frequent collection of export statistics would result in the loss of data that is currently released monthly. This would adversely affect the release of the monthly U.S. International Trade in Goods and Services Report (including U.S. trade balance figures) and the release of the monthly Advance Economic Indicators report that contains international trade in goods statistics. This would also impact the BEA's Advance Estimate of Gross Domestic Product (GDP).

The Census Bureau currently releases the official export statistics approximately 30 calendar days after the month of export. A delay in this release could greatly impact the publication of the merchandise trade balance, produced by the Federal Government, which is one of the most sensitive and closely watched of the principal federal economic indicators. The Council of Economic Advisors, Congress, the Trade Policy Agencies, the press, and financial markets focus great attention on the monthly release. Slight movements in the trade balance affect public policy, financial decisions, Congressional actions, and market movements. The overall trade deficit and deficits with major trading partners are some of the most important economic issues in recent years.

In addition, BEA uses merchandise trade figures in their advance GDP estimate. The GDP measures the value of goods and services produced in the U.S. economy and is critical to the Federal Reserve, businesses, and policymakers around the world. Under coverage of exports will reduce the accuracy of the advance GDP and lead to greater revisions to the second and third estimates of GDP.

Separating the AES record from the actual export movement of a shipment would disallow the use of the AES record as a tool to be used for export control purposes by the CBP, HSI, BIS, the State Department, and any other federal agency utilizing the information for detecting and preventing the export of regulated sensitive commodities to unauthorized destinations.

7. Special Circumstances

The collection of export information from the AES is conducted in a manner consistent with the OMB guidelines, except that the response is required more frequently than on a quarterly basis. The USFPI or the authorized agent must present the AES proof of filing citation, postdeparture filing citation, AES downtime citation, an exemption or exclusion citation to the exporting carrier prior to export for annotation on the carrier's outward manifest (19 U.S.C.). However, for shipments between the United States and Puerto Rico, the AES proof of filing citation, postdeparture filing citation, AES downtime citation, exemption or exclusion citation must be presented to the carrier prior to arrival of the shipment at the port of unloading.

8. Consultations Outside the Agency (Census Bureau)

The Census Bureau has an established email list of more than 152,000 individuals and businesses that export. We inform these contacts of any developments or changes within the AES program and frequently receive feedback in person, by email, telephone, or in writing from these entities.

The Census Bureau maintains a website (found at <https://www.census.gov/foreign-trade>) and Global Reach blogs (found at <https://www.census.gov/newsroom/blogs/global-reach.html>) that provide up-to-date information on all major developments relating to the AES, FTR, filing requirements, and trade data. The export trade community uses these sites and other federal agency's websites extensively to keep informed on current export trade policies as they pertain to developments regarding the preparation and filing of exports.

The Census Bureau regularly participates in seminars and conferences sponsored by various trade organizations and other government agencies. These seminars and conferences educate the export trade community on the AES filing requirements as it pertains to the FTR, Title 15 CFR, Part 30. These seminars and conferences address numerous topics such as how to maintain compliance with the U.S. export regulations, accurately preparing and filing the AES record, and classifying commodities. Although these programs are not specifically designed to elicit public response, the seminars do provide a means of obtaining the public's views on statistical regulations governing exports. Comments received at these various conferences and seminars are on an individual basis, informal in nature and not for building a consensus. Participation in these conferences enables the Census Bureau to keep the export trade community informed of current regulatory policy decisions and allow for the exchange of information.

The Census Bureau published a notice in the Federal Register on November 21, 2022 (volume 87, pages 70777-70778) inviting public comments on our plans to submit this request. We received one comment from Mr. Andrew Reamer, Research Professor George Washington Institute of Public Policy, George Washington University. Mr. Reamer indicated that he believes the proposed plans for the AES will be desirable for enhancing understanding and monitoring of global value chains. He also requested copies of the collection instruments and supporting statements. We provided these to Mr. Reamer on December 13, 2022.

We received an anonymous comment suggesting that the Census Bureau consider removing the redundant "State of origin" field from the AES because the definition is the same as the USPPI State and it leads to duplication, confusion, and erroneous reporting by USPPIs. The Census Bureau also received a similar comment from Mr. Robert Feke, Senior Director of the Corporate Trade & Compliance Group, Kintetsu World Express (U.S.A.), Inc. Mr. Feke commented that the State of Origin and the USPPI State are redundant and requested the Census Bureau look into the possibility of deleting the requirement to report the Origin State. Mr. Feke also questioned why the two data elements are collected for the same purpose, and if they are to be the same, then what is the need to generate an informational message in AES when the two data elements are different. The Census Bureau has been considering these requests and actively researching this issue since a similar comment was received to the 2019 pre-submission notice. Since 2019, the Census Bureau has reviewed the definitions, gathered statistics from the AES when the state of origin and USPPI state do not match, contacted USPPIs to understand why the reported data fields differ, and issued an AES Broadcast on June 30, 2022, to remind AES filers of the requirements for reporting these fields. The Census Bureau has proposed to CBP a new requirement in AES to add an informational message when the state of origin and USPPI state do not match on the AES record. It is estimated that the informational message will be deployed in February 2023. Once the Census Bureau studies the impact of the informational message and considers the effects on statistical state data releases, the Census Bureau will decide whether to remove the state of origin field.

Additionally, the Census Bureau received another comment from Mr. Feke regarding the definition of value in the FTR. Mr. Feke requested that the Census Bureau explain the requirement for the transportation charges and other charges to the port of export to be included in value, and why the Census Bureau wants this information, specifically the charges. The Census Bureau collects value, including selling price, inland/domestic freight, insurance and other charges to the port because it allows for consistency with Customs value on imports. The statistical value of U.S. imports is the Customs value, which includes shipping costs up to the port of exit where the goods are brought alongside the carrier that is transporting them to the United States. This definition of value is consistent with the United Nations (UN) recommendations for export valuation and is commonly used by UN partner nation statistical agencies. The Census Bureau wants the charges information since it is part of the definition of value, i.e., the selling

price in U.S. dollars plus inland or domestic freight, insurance and other charges to the U.S. seaport, airport, or land border port of export.

We received a comment from Elizabeth K. Gant, License Customs Broker, Corporate Regulatory Compliance Analyst, Shapiro. Ms. Gant also is a representative to the National Customs Brokers and Forwarders Association of America (NCBFAA) and the Bureau of Industry and Security's Regulatory Policy Technical Advisory Committee (RPTAC). In her comment, Ms. Gant reiterated the comments of the NCBFAA and RPTAC to the Census Bureau's NPRM published in 2021 to propose the addition of a conditional data element, country of origin in the AES. Ms. Gant requests that the NCBFAA and RPTAC comments be taken into consideration for the additional costs and burden it will place on USPPIs and freight forwarders, and for the lack of assurance that the proposed collection will provide accurate statistics representing country of origin. As stated above under Necessity of the Information Collected, the Census Bureau is currently reviewing the comments from NCBFAA and RPTAC along with the other comments received to the NPRM. All comments will be considered before any final decisions are made and any changes to the AES will be submitted to OMB for approval under the Paperwork Reduction Act, as well as published in the Federal Register as a Final Rule.

The Census Bureau published a notice of proposed rulemaking in the Federal Register on May 3, 2023 (volume 88, pages 27815-27818) inviting public comments on our plans to add a conditional data element, Directorate of Defense Trade Controls (DDTC) Category XXI Determination Number, when "21" is selected in the DDTC United States Munitions List (USML) Category Code field in the Automated Export System (AES) to represent USML Category XXI. The Census Bureau gave the public 60 days to comment, and at the conclusion of the 60 days, no comments were received. In the final rule published on August 10, 2023, the U.S. Census Bureau sought public comments regarding: whether this proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; the accuracy of the burden estimate; ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information, including through the use of automated collection techniques or other forms of information technology.

9. Paying Respondents

The Census Bureau does not pay respondents to provide the AES information.

10. Assurance of Confidentiality

The AES record is exempt from public disclosure by statute, Title 13, U.S.C., Chapter 9, Section 301(g), unless the Secretary of Commerce determines that such exemption would be contrary to the national interest. This provision also exempts disclosure under the Freedom of Information Act, Title 5, U.S.C., pursuant to Sections 552 (b)(3) and (b)(4). Department Organization Order 35-2A, Section 3.01a, delegated the authority to make

the national interest determination to the Director of the Census Bureau. The statutory responsibility to protect information filed in the AES is implemented in the FTR, Part 30.60.

During the AES registration process, filers must certify that all statements made, and information provided is true and correct and understand that penalties for violations of the U.S. laws related to exportation may be imposed (referenced in the FTR, Subpart H - Penalties). In addition, the filing of complete, accurate and timely export information via the AES is mandatory under Chapter 9, Title 13, U.S.C.

11. Justification for Sensitive Questions

The AES records do not contain any questions of a sensitive nature.

12. Estimate of Respondent Burden

The following table shows the total annual responses, and the time required to collect information and to complete the AES record. The hours per response also include time required for record keeping.

	Annual Responses	X	Hours Per Response	=	Total Hours
AES	17,025,219		.05		851,261

The estimate of approximately three minutes (.05 hours) per electronic AES submission is based on historical records and an examination of an electronic submission. The Census Bureau estimates that approximately one quarter to one third of the information reported in the AES is repetitious and can be automatically inserted on each electronic submission. An example of such repetitious information is the name, address, and Employer Identification Number of the USPP. Many automated filing respondents extract preexisting information from their electronic databases eliminating the need to repeatedly enter duplicate information. Additionally, the estimate represents an average time and accounts for a wide variety of circumstances.

Burden Hours	X	Median Hourly Wage	=	Respondent Cost/AES Record
851,261		\$22.00 /hour		\$18,727,742

The estimate of \$22.00 per hour is roughly based on the wages of the cargo and freight agents responsible for preparing the AES record. The estimate was derived from the U.S. Department of Labor’s occupational employment statistics.

13. Estimate of Cost Burden

The Census Bureau expects that varying costs will be incurred for respondents submitting the AES records. For respondents that use the ACE AES*Direct*, the only cost involved is

a personal computer and access to the Internet. Since this investment would be used for more than AES purposes, the cost of this investment would be minimal.

Respondents that prefer to develop or purchase software that connects to the AES, must submit a Letter of Intent (Attachment B) to the Census Bureau to participate in the AES. Typically, there is an initial cost in developing the software that interfaces with AES. For respondents who purchase pre-developed software packages, the AES filer will incur a cost to the software vendor.

Some filers may also interface AES with their existing programs, which is generally less expensive than purchasing or developing new software. Further, purchasing of outside freight forwarder services, if utilized by respondents, is part of usual and customary business practices and not specifically required for this information collection. The data supports the decrease in cost because the growth of non-ACE AESDirect filers has drastically decreased. Filers are more likely to use the free, ACE AESDirect system to file.

14. Cost to Federal Government

The Census Bureau bears the primary federal cost of maintaining ACE AESDirect. Since the collection of export data is an integrated program, detailed costs are not available for each individual AES record. The export statistics program in the Economic Management Division is estimated to cost \$6.6 million for FY2022. The costs include survey design, data collection, data processing, outreach, promotion, and overhead costs. We expect this cost to remain relatively constant for FY2023 and FY2024.

15. Reason for Change in Burden

The Census Bureau performed an analysis of the AES records submitted from 2019 to 2022. The analysis showed a downward trend in the number of AES records submitted during that time period. Therefore, we have adjusted the burden hours downward from 865,798 in 2019 to 851,261 in 2022.

16. Project Schedule

The Census Bureau processes export data reported on the AES record for publication in categories outlined in the regular foreign trade statistics program. These data are collected and published monthly, approximately 26-28 calendar days after the reference month for the advance international trade in goods and 34-38 calendar days after the reference month for the U.S. International Trade in Goods and Services report.

The Preliminary U.S. Imports for Consumption of Steel Products report is an exception to the monthly press release schedule. The preliminary import steel report is published between 24 and 27 days after the close of the statistical month.

The press release schedule can be found at
https://www.census.gov/foreign-trade/reference/release_schedule.html.

17. Request to Not Display Expiration Date

We do not wish to display an expiration date within the AES because AES software is developed by CBP and interfaces to the AES are vendor developed. To include an expiration date within AES-based software would impose extensive and costly changes on AES software vendors and filers.

18. Exceptions to the Certification

There are no exceptions.