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The National Customs Brokers & Forwarders Association of America, Inc.'s ("NCBFAA") submits the attached comments to the Department of Homeland Security ("DHS"), Customs and Border Protection ("CBP") in response to the CBP's Notice for Comments ("Notice") published in the Federal Register Fed. Reg. 90,288 (December 1, 2025).

Headquartered in the Washington DC metro area, the NCBFAA represents more than 1,400 member companies with over 110,000 employees in international trade - the nation's leading freight forwarders, customs brokers, ocean transportation intermediaries (OTIs), NVOCCs and air cargo agents, serving more than 250,000 importers and exporters. The Association's members handle more than 97% of the entries for goods imported into the United States and are directly involved with the logistics of these goods. Further, members operating as OTIs are involved with approximately 80 to 85% of all exports from the United States.