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U.S. CUSTOMS & BORDER PROTECTION DOCKET NO. OMB Control Number 1651-0022 AGENCY INFORMATION
COLLECTION ACTIVITIES; REVISION; ENTRY SUMMARY

I. Introductory Comments

The National Customs Brokers & Forwarders Association of America, Inc.'s ("NCBFAA") submits the following 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.

II. Comments on CBP's Notice of Proposed Rulemaking

In its Notice, CBP is proposing to modify Block 21,22,23 and 24 and modify Block 31 to the CBP Form 7501 to allow for the situation where there are multiple countries of melt and pour or smelt and cast, when applicable.

We would like to bring to your attention that the proposed changes do not account for multiple primary country of **smelt** in Box 22 for aluminum as it does for box 21, 23 and 24. There are situations where various commodities are entered on a single entry summary that have different primary country of smelt for each Individual commodity thus the form should allow for the reporting of Multi in block 22 and line level primary country of smelt reporting.

The excerpt below, from the CBP Form 7501 Instructions found on www.cbp.gov, demonstrate the absence of the ability to report Multi In Box 22 for aluminum as exists for blocks 21, 23 and 24.

BLOCK 21 COUNTRY OF MELT AND POUR

Block 21 is required for the articles of steel subject to the Section 232 steel and steel derivatives measures. *This information must be submitted regardless of whether the Section 232 duty*

treatment applies Report the ISO country code of the original location where the raw steel is first produced in a steelmaking furnace in a liquid state; and then poured into its first solid shape. For steel derivatives, importers must report the ISO code where the steel was originally melted and poured or "OTH" (for other countries). When an entry summary covers merchandise from more than one country of melt and pour, record the word "MULTI" in this block. In column 31, directly below the line number, prefixed with the letters "MP," indicate the ISO code corresponding to each line item.

BLOCK 22) PRIMARY COUNTRY OF SMELT

Blocks 22, 23 and 24 are required for articles of aluminum subject to the Section 232 aluminum and aluminum derivatives remedies. This information must be submitted regardless of whether the Section 232 duty treatment applies. Report the ISO country code where the largest volume of new aluminum metal is produced from alumina (or aluminum oxide) by the electrolytic Hall-Hérault process. Filers must report an ISO code for primary country of smelt; and/or secondary country of smelt. Filers may not report N/A for both primary country of smelt and secondary country of smelt. If the imported aluminum is manufactured only from recycled aluminum, then filers should report N/A, and see instructions under Block 23, secondary country of smelt. CAUTION: Aluminum manufactured only from recycled aluminum is not very common. Filers must be able to provide manufacturing documents, upon request, to document the manufacturing process for the recycled aluminum product.

BLOCK 23) SECONDARY COUNTRY OF SMELT

Report the ISO country code where the second largest volume of new aluminum metal is produced from alumina (or aluminum oxide) by the electrolytic Hall-Hérault process. If the imported aluminum is manufactured only from recycled aluminum, then filers should report the ISO code of the country reported as the country of origin of the imported article as the secondary country of smelt. CAUTION: Aluminum manufactured only from recycled aluminum is not very common. Filers must be able to provide manufacturing documents, upon request, to document the manufacturing process for the recycled aluminum product. When an entry summary covers merchandise from more than two countries of smelt, record the word "MULTI" in this block. In column 31, directly below the line number, prefixed with the letter "S," indicate the ISO code corresponding to each line item.

BLOCK 24) COUNTRY OF CAST

Report the ISO country code where the aluminum (with or without alloying elements) was last liquified by heat and cast into a solid state. The final solid state can take the form of either a semifinished product (slab, billets or ingots) or a finished aluminum product. When an entry summary covers merchandise from more than one country of cast, record the word "MULTI" in this block. In column 31, directly below the line number, prefixed with the letter "C," indicate the ISO code corresponding to each line item.



DEPARTMENT OF HOMELAND SECURITY
 U.S. Customs and Border Protection
ENTRY SUMMARY

OMB CONTROL NUMBER 1651-0022
EXPIRATION DATE 11/30/2025

1. Filer Code/Entry Number		2. Entry Type		3. Summary Date		4. Surety Number		5. Bond Type		6. Port Code		7. Entry Date			
8. Importing Carrier				9. Mode of Transport				10. Country of Origin				11. Import Date			
12. B/L or AWB Number				13. Manufacturer ID				14. Exporting Country				15. Export Date			
16. I.T. Number		17. I.T. Date		18. Missing Docs		19. Foreign Port of Lading				20. U.S. Port of Unlading					
21. Country of Melt and Pour								22. Primary Country of Smelt							
23. Secondary Country of Smelt								24. Country of Cast							
25. Location of Goods/G.O. Number								26. Consignee Number		27. Importer Number				28. Reference Number	
29. Ultimate Consignee Name (Last, First, M.I.) and Address												30. Importer of Record Name (Last, First, M.I.) and Address			
Street												Street			
City State Zip												City State Zip			
31. Line No.		32. Description of Merchandise				36. A. Entered Value B. CHGS C. Relationship		37. A. HTSUS Rate B. AD/CVD Rate C. IRC Rate D. Visa Number		38. Duty and IR Tax					
		33. A. HTSUS No. B. AD/CVD No.		34. A. Gross Weight B. Manifest Qty.		35. Net Quantity in HTSUS Units						Dollars Cents			

More importantly, the proposed requirements include data elements that are already being provided via Automated Commercial Environment electronically. The entry summary form is not required for Entry Summaries that are transmitted electronically as per CBP's Guidance on Recordkeeping in the Automated Commercial Environment (ACE). The printed 7501 is only required for very limited scenarios such as non-automated entries or warehouse entries/withdrawals. To make changes to the printed form is a burden to the trade to reprogram the form for a document that is not required for most entries. This proposed collection of information on a paper form is not necessary for the proper performance of the functions of the agency as the information is electronically available to the agency.

The unnecessary duplication of data both in electronic format and through paper-based processes increases resource consumption for both the trade and CBP. Moreover, it is worth noting that in cases where non-ABI transactions occur, CBP already possesses the necessary data from the paper documents that accompany the entry.

We also take note that the Notice refers to paper 7501, and we advocate that CBP should not continue to rely on the modifying the paper Form 7501 for Automated Broker Interface (ABI) entries. The paper-based approach is archaic and hinders the efficiency of importation processes. Instead, we urge CBP to continue to embrace

modern technology and fully transition to electronic submission methods. This transition would significantly reduce paperwork burdens and enable faster and more accurate data exchange between importers and CBP.

We strongly recommend that CBP only effectively implement a change in the Customs and Trade Automated Interface Requirements (CATAIR). This change should establish electronic data transmission channels, ensuring that all CBP officers have access to comprehensive information through the Automated Commercial Environment (ACE) system. By relying on electronic data, the need to modify the paper Form 7501 would be obviated, as all relevant information would be readily available through existing electronic platforms. This suggestion enhances the quality, utility and clarity of the information collected as it remains in its electronic state and uses an appropriate automated and technological collection of information.

III. Conclusion

In conclusion, the NCBFAA respectfully urges CBP to embrace electronic data submission methods without the need to further modify the 7501 form. By doing so, we can collectively achieve a modernized importation process that prioritizes efficiency, reduces burdens on the trade industry, minimizes data duplication and aligns with the goals of automation.

Respectfully submitted,



Jose D. Gonzalez President, NCBFAA

cc: Sandy Coty, NCBFAA Customs Committee Chair
Ralph De La Rose, NCBFAA Customs Committee Vice Chair
Lenny Feldman, NCBFAA Counsel

