

**Supporting Statement**  
**Entry/Immediate Delivery Application and ACE Cargo Release**  
**1651-0024**

**Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

All items imported into the United States are subject to examination before entering the commerce of the United States. There are two procedures available to affect the release of imported merchandise, including "entry" pursuant to 19 U.S.C. 1484, and "immediate delivery" pursuant to 19 U.S.C. 1448(b). Under both procedures, CBP Forms 3461, Entry/Immediate Delivery, and 3461 ALT are the source documents in the packages presented to Customs and Border Protection (CBP). The information collected on CBP Forms 3461 and 3461 ALT allow CBP officers to verify that the information regarding the consignee and shipment is correct and that a bond is on file with CBP. CBP also uses these forms to close out the manifest and to establish the obligation to pay estimated duties in the time period prescribed by law or regulation. CBP Form 3461 is also a delivery authorization document and is given to the importing carrier to authorize the release of the merchandise.

CBP Forms 3461 and 3461 ALT are provided for by 19 CFR 142.3, 142.16, 141.22, and 141.24. The forms and instructions for Form 3461 are accessible at: <https://www.cbp.gov/newsroom/publications/forms?title=3461&=Apply>

Ace Cargo Release (formerly referred to as "Simplified Entry") is a program for ACE entry summary filers in which importers or brokers may file ACE Cargo Release data in lieu of filing the CBP Form 3461. This data consists of 12 required elements: importer of record; buyer name and address; buyer employer identification number (consignee number), seller name and address; manufacturer/supplier name and address; Harmonized Tariff Schedule 10-digit number; country of origin; bill of lading; house air waybill number; bill of lading issuer code; entry number; entry type; and estimated shipment value. There are also four optional data elements : the container stuffing location, consolidator name and address, ship to party name and address. There are three Global Business Identifier (GBI) identifiers available to filers: 20-digit Legal Entity Identifier (LEI), 9-digit Data Universal Numbering System (DUNS), and 13-digit Global Location Number (GLN). The GBI Identifiers can be inputted for any of the following parties: manufacturer/producer, seller shipper, exporter, distributor or packager. The GBI identifiers are new optional data elements that are being collected to better identify the legal entity that is interacting with CBP as well as explore opportunities to enhance supply chain traceability and visibility in response to the growing complexity of global trade. The data collected under the ACE Cargo Release program is intended to reduce transaction costs, expedite cargo release, and enhance cargo security. ACE Cargo Release filing minimizes the redundancy of data submitted by the filer to CBP through receiving carrier data from the carrier. This design allows the participants to file earlier in the transportation flow. Guidance on using ACE Cargo Release may be found at <http://www.cbp.gov/trade/ace/features>

It should be noted that ACE Cargo Release was previously called Simplified Entry.

### **Proposed Changes:**

1. **Global Business Identifier (GBI):** Collectively, the updates proposed below aim to enhance upstream supply chain traceability and visibility while addressing the increasing complexity of global trade supply chains. All participation and data submitted is voluntary. Find more details about GBI in the 1651-0141 GBI information collection.
  - The GBI Test is expanding the available supply chain entity party types from the original six optional parties (Manufacturer, Shipper, Seller, Exporter, Distributor, Packager), to include two new parties: "Intermediary" and "Source, along with optional free text fields that will allow filers to input additional descriptions and information about the specific party type. These party types would be made available in the GBI Enrollment database as well as the Automated Commercial Environment Cargo Release.
  - A modification within the Global Business Identifiers (GBI) Enrollment database will allow the trade to submit one or more of the unique GBI's (the Legal Entity Identifier (LEI), Global Location Number (GLN), and Data Universal Numbering System (DUNS)) for a supply chain entity, as opposed to all three as previously approved and announced. Furthermore, a related programming update will enable trade participants the ability to modify or change a previous enrollment, including updating or adding additional GBI numbers.
  - CBP intends to expand the choices of identifiers available to filers over the duration of the Test, including those that at no cost to the government provide access to the underlying entity and product specific supply chain data associated with the identifier. This would enhance traceability for CBP which may translate to facilitation benefits and reduced industry costs. CBP has initiated programming requests in ACE to accommodate the intake of additional GBI identifier qualifiers. These changes are under development and there is no defined timeline for their completion. Specifically, CBP will begin by adding to the GBI Test the new Altana ID (ALTA) maintained by Altana Technologies, USG Inc. (Altana). The addition of the ALTA alongside current and future GBI identifiers will widen participants' choices and allow CBP to continue to evaluate the breadth and veracity of entity and supply chain information embedded within different types of identifier solutions already being leveraged by trade industry traceability stewards. It will also contribute to CBP's ongoing exploration of how traced supply chain information may be ingested and operationalized for risk management and facilitation purposes. CBP will add any new identifiers into the collection and submit to OMB for approval as they are determined through a change request (Form 83-C).
  
2. **Russian Sanctions Executive Order 14114:**
  - New Data Elements are being added to comply with the Russian sanctions outlined in Executive Order 14114 published on December 22, 2023. The data elements and burden are recorded in the supporting statement of the 1651-ONEW Russian Sanctions information collection package.
  
3. **Update to Form 3461/3461ALT Instructions:**

The instructions on the Form 3461/3461 ALT have been updated to include the new Russian sanctions data elements and text field boxes, as well as being updated to improve user experience and clarity of the form. Find a copy of the new form, with the changes outlined included with this package submission as supplementary documents.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information collected on the CBP Forms 3461 and 3461 Alternate, Automated Broker Interface (ABI) and ACE Cargo Release is used by importers and brokers to obtain the release of the merchandise from CBP custody. These forms are filled out for each shipment and presented to a CBP officer along with the invoices and a bond to obtain release of the goods. CBP Form 3461 ALT is used when imported merchandise is to be transferred to a Centralized Container Station. The data collected under the ACE Cargo Release expedites the entry process. Trade also submits data through ABI relevant to GBI pilot.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.**

This collection of information may be submitted electronically through the Automated Broker Interface (ABI) into ACE. ACE Cargo Release is fully automated via ACE.

As a completely voluntary program, should an import choose to provide GBI numbers as part of the GBI Test, ABI Filers, including brokers and self-filers, are required to submit one or more identifiers (LEI, GLN, DUNS) for various entities such as the manufacturer, seller, shipper, exporter, distributor and packager.

New programming would add to the list of available entities to provide GBI number for: intermediary, and source, along with an additional free text field. In addition, programming to intake new identifiers will expand the choices available to filers, as well as allow those already using them for supply chain management purposes to declare them to CBP. This approach enables CBP to intake critical and essential supply chain data efficiently, reducing the need for manual data entry and minimizing errors. By leveraging information technology, the process becomes more efficient and less burdensome for trade participants, ensuring that the U.S. government can monitor imports more effectively and address any gaps in the data.

**Usability Testing:**

Usability testing for the completion and submission of CBP Form 3461 was conducted through a brief questionnaire sent to its primary users (Legal Representative, Business entity, Importer, Manufacturer, Broker, Consignee.)

These are recommendations from the second participant, who called out specific fields for improvement.

- 17 & 18 asks for the reference ID code and number. The instructions say “Provide the reference ID code.” And “Provide the reference ID number up to 50 characters.” What is the reference ID code and number? I believe this is a code assigned by the importer or broker; this is not clear.
- The instructions for 28A would be clearer if it read: Provide the country where a shipment of diamonds has been mined or extracted. If the line item does not contain diamonds, as in certain articles of jewelry, then the disclaimer is made on the line level. If country of mining does not apply, check no.
- 28B & 28F would be clearer if they included a list of products (by HTS) that require reporting country of harvest.
- 28 and 29 appear to both ask for the HTS number. Why must the HTS number be reported twice?
- 38 & 39 are not clear and the instructions simply reiterate the box name. Including an explanation of non-AMS and split bill and where this information can be found would be helpful.
- The BOL sections seem to be redundant. If there are two BOLs is the second BOL listed in boxes 40-45 in the first block or in boxes 38-45 in the second block? It seems that the second block with boxes 38048 is not needed.

CBP will take these into recommendation.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This information is not collected in any other form, and therefore is not duplicated elsewhere. Additionally, the programming expands the choices of available entities that a GBI number can be provided for and expands the choices of GBI identifiers that can be submitted. We are not aware of other programs intaking these numbers or the data behind them.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The burdens associated with these information collections have been minimized as much as possible given the circumstances.

**6. Describe consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If the information was collected less frequently, there would be longer delays in processing cargo into the United States. This would prove to be costly and time consuming to the importers and brokers. Further, it could lead to increased risks to the revenue, health and safety of the United States, if imported cargo was released without proper screening of import information.

If data collection for the GBI Test is reduced or inconsistent, several key consequences could arise. The program's ability to enhance CBP's visibility into supply chains would be compromised; gaps in tracking the origin and production of goods would increase the risk of abuse or non-compliance and trade fraud in the GBI Test. Infrequent data collection would weaken the program's usefulness in providing accurate and time data for risk assessments and ultimately admissibility decisions. Inaccurate or untimely data could inadvertently allow high-risk shipments to enter the U.S. market, jeopardizing consumer safety and national security.

Furthermore, delays in data collection would slow the development and refinement of the GBI program, hindering its ability to address emerging trade challenges and integrate with other initiatives, such as those involving PGA partners like FDA. Reduced engagement from trade partners could result in diminished feedback, weakening the program's collaborative efforts and its ability to meet the needs of the trade community. Additionally, insufficient data collection could undermine the government's ability to enforce trade regulations effectively, leading to more violations and potential revenue loss.

Finally, the program's capacity to innovate and modernize trade practices through the use of advanced data would be stifled.

**7. Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.6.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Public comments were solicited through two FRNs, a 60-day notice published on January 14, 2025 (90 FR 3231) on which no comments were received, and on December 01, 2025 (90 FR 55155) on which no comments have been received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There is no offer of a monetary or material value for this information collection.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Privacy coverage is provided by the following PIAs and SORNs:

A Privacy Impact Assessments (PIAs):

- DHS/CBP/PIA-003(b) - Automated Commercial Environment (ACE). CBP Privacy will update this PIA series to provide transparency on the GBI program.
- DHS/CBP/PIA-006 Automated Targeting System (ATS), and the
- Customs-Trade Partnership Against Terrorism (C-TPAT), February 14, 2013.

System of Record Notices (SORNs):

- DHS/CBP-001 Import Information System, SORN, July 26, 2016, 81 FR 48826,
- DHS/CBP-006 Automated Targeting System, SORN, May 22, 2012, 77 FR 30297
- CBP/DHS-018 Customs--Trade Partnership Against Terrorism (C-TPAT) SORN, March 13, 2013.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information.**

<b>FORM</b>	<b>TOTAL ANNUAL BURDEN HOURS</b>	<b>NO. OF RESPONDENTS</b>	<b>AVG. NO. OF RESPONSES PER RESPONDENT</b>	<b>TOTAL RESPONSES</b>	<b>TIME PER RESPONSE</b>
ACE Cargo Release/ABI:	4,875,609	9,810	3,041	29,371,140	10 minutes (.166 hours)
<b>Form 3461 Paper/Electronic Submission Only:</b> Entry/Immediate Delivery Form 3461	3,077	12,995	1	12,307	15 minutes (.25 hours)

CBP Form 3461 was previously planned to be discontinued, CBP has decided to continue accepting Form 3461 for those who want a paper option. However, GBI participation is voluntary and the GBI data is only transmitted via ABI and is not available in the paper option.

**Public Cost**

The estimated cost to the respondents is \$XXX. This is based on the estimated burden hours (XXX) multiplied by the average loaded hourly wage rate for importers (\$36.57). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics’ (BLS) 2024 median hourly wage rate for Cargo and Freight Agents (\$23.99), which CBP assumes best represents the wage for importers, by the ratio of BLS’ Q4 2024 total compensation to wages and salaries for Office and Administrative Support occupations (1.4886), the assumed occupational group for importers, to account for non-salary employee benefits.<sup>1</sup>

<sup>1</sup> Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics, “May 2024 National Occupational Employment and Wage Estimates United States.” Updated April 2, 2025. Available at

CBP uses an annual growth rate of 2.42% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.<sup>2</sup>

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

There are no additional record keeping, capital, start-up or maintenance costs associated with this information collection.

**14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The estimated annual cost to the Federal Government associated with the review of these records is \$178,741,558. This is based on the number of responses that must be reviewed (29,383,447) multiplied by the time burden to review and process each response (5 minutes or .083 hours) = 2,438,826 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$73.29)<sup>3</sup> = \$178,741,558.

The estimated annual cost to the Federal Government associated with the review of this information collection is \$XXX. This is based on the number of responses that must be reviewed (29,383,447) multiplied by the time burden to review and process each response (5 minutes or 0.083 hours) = 2,438,826 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$84.17)<sup>4</sup> = \$205,275,984.

**15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.**

There is no increase in the previously reported annual burden for this information collection. The associated burden to the trade for GBI changes has been reported in the supporting statement of the 1651-0141 GBI information collection package, and mentioned above in

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[https://www.bls.gov/oes/2024/may/oes\\_nat.htm](https://www.bls.gov/oes/2024/may/oes_nat.htm). Accessed June 17, 2025. The total compensation to wages and salaries ratio is equal to the total compensation cost per hour worked for Office and Administrative Support occupations (\$35.86) divided by the wages and salaries cost per hour worked for the same occupation category (\$24.09). See "Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group." Bureau of Labor Statistics, "Employer Costs for Employee Compensation – December 2024." Released March 14, 2025. Available at [https://www.bls.gov/news.release/archives/ecec\\_03142024.pdf](https://www.bls.gov/news.release/archives/ecec_03142024.pdf). Accessed June 17, 2025.

<sup>2</sup> To adjust to 2025 dollars, multiply by the 2023-2024 percent change in the Bureau of Economic Analysis's Implicit Price Deflators for Gross Domestic Product (125.230/122.273-1). See "Table 1.1.9. Implicit Price Deflators for Gross Domestic Product," Line 1 Gross Domestic Product, annual. Bureau of Economic Analysis. Updated May 30, 2025. Available at <https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwYLDMsM10sImRhdGEiOltbImNhdGVnb3JpZXMlLCJtdXJ2ZXkiXSxbIk5JUEFfVGFibGVfTGZldCI6IjEzIiwuWyJGaXJzdF9ZZWFyIiwuMjAxNiJdLFsiTGZzdF9ZZWFyIiwuMjAyNCJdLFsiU2NhbGUlLCIwIl0sWyJ0ZXJpZXMlLCJBIi1dfQ==>. Accessed June 17, 2025.

<sup>3</sup> CBP bases this wage on the FY 2021 salary and benefits of the national average of CBP Trade and Revenue positions, which is equal to a GS-12, Step 1. Source: Email correspondence with CBP's Office of Finance on September 7, 2021.

<sup>4</sup> CBP bases this wage on the FY 2024 salary and benefits of the national average of CBP Trade and Revenue positions. Source: Email correspondence with CBP's Office of Finance on July 15, 2025.

Q1, the change includes adding the new identifier, data elements, and text fields to the electronic 3461 ABI submission for the voluntary GBI program.

**16. For collection of information whose results will be published, outline plans for tabulation, and publication.**

This information collection will not be published for statistical purposes.

**17. If seeking approval to not display the expiration date, explain the reasons that displaying the expiration date would be inappropriate**

CBP will display the expiration date for OMB approval of this information collection.

**18. "Certification for Paperwork Reduction Act Submissions."**

CBP does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods**

No statistical methods were employed.