

## Importer Security Filing (ISF) Instructions

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**Business Unit:** RRNA Customs Office

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For the attention of the Managing Director and Quality Manager.

**Dear Sir or Madam,**

### Scope/Applicability:

Suppliers and Service Providers who export to the United States via Ocean Vessel

### Introduction:

NTS 287 was issued in January 2010 and introduced Importer Security Filing (ISF) requirements. This NTS reiterates those requirements with updates to Rolls-Royce business and function names, and pre-alert e-mail addresses.

ISF went into effect on January 26, 2010. The final rule applies to import cargo arriving in the United States by ocean vessel. Failure to comply could result in monetary penalties, increased inspections and delay of cargo. ISF information improves the ability of United States Customs and Border Protection (CBP) to identify high-risk shipments for the prevention of smuggling and ensure cargo safety and security. Before containerized merchandise arriving by ocean vessel can be shipped to the United States (US) the ISF Importer or their agent (e.g., licensed customs broker) must electronically submit specific cargo information to CBP in advance, in the form of an ISF. This requirement applies only to cargo arriving in the US by ocean vessel; it does not apply to cargo arriving by other modes of transportation. The ISF Importer is typically the goods' owner, purchaser, consignee, or agent. Rolls-Royce is the ISF Importer for transactions where a Rolls-Royce US business unit is the contractual owner, purchaser, or consignee causing goods to enter the commerce of the US. The ISF Importer for foreign cargo remaining on board (FROB) is the carrier of goods. The ISF Importer for immediate exportation (IE), transportation & exportation (T&E) in-bond shipments, and goods to be delivered to a Foreign Trade Zone (FTZ) is the party filing the IE, T&E, or FTZ documentation.

### Requirements:

1. Shipments of goods entering the commerce of US or intended to be delivered to an FTZ require the submission of ten data elements; eight no later than 24 hours before the cargo is laden aboard a vessel destined for the US, and two no later than 24 hours prior to arrival at a US port. The data elements are:
  - Seller
  - Buyer
  - Importer of Record number or FTZ applicant identification number
  - Consignee number(s)
  - Manufacturer (or supplier)\*
  - Ship to Party\*
  - Country of Origin\*
  - Commodity Harmonized Tariff Schedule of the US (HTSUS) number\*
  - Container stuffing location+
  - Consolidator name and address+

\*ISF Importers have flexibility with respect to the submission of these four data elements. Importers may submit a range of acceptable responses based upon facts available to the ISF Importer at the time of submission. The ISF must be updated as soon as more accurate or precise data becomes available or no later than 24 hours prior to the ship's arrival at a US port.

+These data elements must be submitted as early as possible, but no later than 24 hours prior to the ship's arrival at a US port.

2. Shipments consisting entirely of FROB or transported in-bond as an IE or T&E require the submission of five data elements; no later than 24 hours before the cargo is laden aboard a vessel destined for the US (IE or T&E in-bond shipments) or any time prior to lading (FROB). The data elements are:

- Booking party
- Foreign port of unloading
- Place of delivery
- Ship to party
- Commodity Harmonized Tariff Schedule of the United States (HTSUS) number

3. Shipments consisting entirely of bulk cargo are exempt from ISF. Bulk cargo or freight is defined as homogenous cargo that is stowed loose in the hold and is not enclosed in any container such as a box, bale, bag, cask, or the like. Bulk cargo is composed either of free flowing articles such as oil, grain, coal, ore, and the like which can be pumped or run through a chute or handled by dumping; or uniform cargo that stows as solidly as bulk cargo and requires mechanical handling for lading and discharging.

4. Shipments consisting entirely of break bulk cargo are exempt from the 24 hour minimum prior to lading timing requirement; instead the ISF is required a minimum of 24 hours prior to arrival. To qualify for this timing exemption the cargo or freight must not be containerized nor meet the definition of bulk cargo as defined in the previous paragraph.

**ISF Enforcement:**

Possible enforcement actions are:

- Issuance of \$5,000 fines (per violation) for inaccurate, incomplete, or untimely filing.
- Issuance of "do not load" orders at the port of origin.
- Inspection of non-compliant cargo upon arrival in the US.
- Denial of release or permission to transfer/unload cargo in the case of failure to file.
- Seizure if cargo is released, transferred or un-laden without permission.

**Security Filing Data Requirements**

**ISF-10 "U.S.-bound" Cargo**

**ISF-5 "Transit" Cargo**

**Additional Carrier Requirements**

**(3461 Entries, IT, FTZ)**

24 Hrs. Prior to Lading\*

1. Importer of Record Number
2. Consignee Number
3. Seller (Owner) name/address
4. Buyer (Owner) name/address
5. Ship to Party
- > 6. Manufacturer (Supplier) name/address
- > 7. Country of Origin
- > 8. Commodity HTS-8

ASAP, But NLT 24 Hrs Prior to Arrival

9. Container Stuffing Location
10. Consolidator (Stuffer) name/address

> Must be linked together as a line-item at the shipment level

\*ISFs for "exempt" break bulk shipments are required 24 Hrs prior to arrival.

**(FROB\*, IE, TE)**

24 Hrs. Prior to Lading\*

1. Booking Party name/address
2. Ship to Party
3. Commodity HTS-8
4. Foreign Port of Unloading
5. Place of Delivery

\*FROB ISF-5 is required anytime prior to lading

**Vessel Stow Plan**

NLT 48 Hrs. After Departure\*

\*Anytime prior to arrival for voyages less than 48 Hrs

**Container Status Message (CSM) Data**

Within 24 Hrs of Creation or Receipt

ISFs must also have the lowest bill of lading number that is referenced in AMS on the electronic manifest.



**Action Required:**

The Rolls-Royce North America Customs Office (RRNA CO) requires the provision of the following data elements for all ocean shipments destined for a US port a minimum of four (4) business days before the date of departure from the last non-US port in the form of an ISF pre-alert:

- Bill of Lading Number (BOL#); Lowest level BOL# matching the Automated Manifest System (AMS) filing.
- Standard Carrier Alpha Code (SCAC) of the issuer of the lowest level bill of lading
- Vessel name
- Voyage number
- Cargo lading date; the vessel sailing date from the last non-US port may be provided alternatively in which case the cargo lading date will be identified as the day prior
- Seller (or owner) name and address with postal code; alternatively Dun and Bradstreet Data Universal Numbering System (DUNS) number (must correspond to that party & location)
- Buyer (or owner) name and address with postal code; alternatively DUNS number
- Ship-to name and address with postal code; alternatively DUNS number
- Container Stuffing location name and address with postal code; alternatively DUNS number
- Consolidator (Stuffer) name and address with postal code; alternatively DUNS number
- Manufacturer (Supplier) name & address with postal code for each invoice line item; alternatively DUNS number
- Rolls-Royce part number of each invoice line item
- Country of origin of each invoice line item
- Harmonized Tariff Number (six digits) of each invoice line item

The ISF pre-alert must include copies of the invoice(s) which will be used for customs clearance. Data elements not included on the customs invoice may be provided in any combination of written text, a booking advice, or an ISF submission form as long as all data elements are collectively included and provided in the same communication.

The party Rolls-Royce will hold accountable for the timely and accurate submission of the ISF pre-alert will be based upon the International Commercial Terms (Incoterms) of the transaction:

- E&F INCOTERMS: Transportation Service Provider (Freight Forwarder)
- C&D INCOTERMS: Supplier

The ISF Pre-alert shall be sent to the appropriate RRNA CO e-mail address with "ISF Pre-alert (SCAC BL#)" in the subject line:

LG Fuel Cell Systems Inc [RRFuelCellDOps@rolls-royce.com](mailto:RRFuelCellDOps@rolls-royce.com)  
Rolls-Royce Corporation [RRCorpDailyOps@rolls-royce.com](mailto:RRCorpDailyOps@rolls-royce.com)  
Rolls-Royce Defense Products and Solutions Inc [RRDPSIDailyOps@rolls-royce.com](mailto:RRDPSIDailyOps@rolls-royce.com)  
Rolls-Royce Energy Systems, Inc. [RRESIDailyOps@rolls-royce.com](mailto:RRESIDailyOps@rolls-royce.com)  
Rolls-Royce Marine North America Inc [RRMNAIDailyOps@rolls-royce.com](mailto:RRMNAIDailyOps@rolls-royce.com)  
Rolls-Royce North America Inc. [RRNAIDailyOps@rolls-royce.com](mailto:RRNAIDailyOps@rolls-royce.com)  
Rolls-Royce Engine Services Oakland [RRESODailyOps@rolls-royce.com](mailto:RRESODailyOps@rolls-royce.com)  
Rolls-Royce O\_SYS Inc. [RROSYSDailyOps@rolls-royce.com](mailto:RROSYSDailyOps@rolls-royce.com)

Rolls-Royce suppliers and service providers are responsible for establishing procedures to ensure these requirements are met.

The Rolls-Royce North America Customs Office (RRNA CO) is responsible for the administration of the ISF program for US Rolls-Royce businesses when they are the ISF Importer of Record. This includes but is not limited to making filing arrangements, and providing performance feedback on the timeliness and accuracy of filings.

**NTS Category Type:**

Regulatory / Legislation

**Authorised by:**

Lisa A Bowling

Director of Customs – RRNA