

August 12, 2024

Dear:

Secretary of Department of Homeland Security

Secretary of Treasury

Acting Commissioner of Customs and Border Protection

House of Representatives, Ways and Means Committee

United States Senate, Finance Committee

The undersigned associations write to urge you to finalize the selection for the current term of the Commercial Customs Operations Advisory Committee (COAC). The COAC undertakes critical work and must fully and appropriately represent the trade community. Lacking thirty percent (30%) of its members – as has been the case for the better part of the year – hinders the COAC from meeting its objectives and scope of activities in conjunction with DHS, Treasury, and CBP pursuant to Section 109 of the Trade Facilitation and Trade Enforcement Act of 2015 (19 U.S.C. §4316).

More than 25% of the way into this current two-year term, the COAC roster remains unacceptably unfilled. The COAC is currently short 6 regular members and 5 alternate members. Two meetings have passed, and dozens of recommendations have now been submitted without the benefit of a full COAC. This causes great challenges for the current COAC members, logistical issues for the timing of future COAC terms, and compromises deliberation before a broader set of stakeholders. At a time when we are looking for a more inclusive trade policy, the apparent tolerance of this underrepresentation is unacceptable.

It is urgent that the Administration complete the final vetting and approval for this COAC term, so that those selected candidates can be included in deliberations as soon as possible.

Moreover, we urge the government to return to a consistent and timely selection and vetting schedule moving forward, so that each COAC term can have a full and complete roster for

the limited time they have to conduct their vital work as key representatives of the trade community.

Thank you for your consideration.

Signed:

Agriculture Transportation Coalition (AgTC)

Airforwarders Association (AfA)

American Apparel & Footwear Association (AAFA)

American Association of Exporters & Importers (AAEI)

Atlanta International Forwarders & Broker Association (AIFBA)

Baltimore Customs Brokers and Forwarders Association (BCBFA)

Boston Customs Brokers and Freight Forwarders Association (BCBFFA)

Brownsville Licensed U.S. Customs Brokers Association (BLUSCBA)

Business Alliance for Customs Modernization (BACM)

CBIFFA of Virginia

Coalition for New England Companies for Trade (CONNECT)

Columbia River Customs Brokers and Forwarders Association (CRCBFA)

Customs Brokers and Forwarders Association of Northern California (CBFANC)

Customs Brokers and International Freight Forwarders Association of Washington State, Inc. (CBIFFAWS)

Detroit Customs Brokers and Forwarders Association

Express Association of America (EAA)

Florida Customs Brokers and Forwarders (FCBF)

Foreign Trade Association

Houston Customs Brokers & Freight Forwarders Association

Independent Freight Forwarders & Customs Brokers Association of Savannah, Inc.

International Freight Forwarders and Customs Brokers Association of New Orleans
(IFFCBANO)

Laredo Licensed US Customs Brokers Association (LLUSCBA)

Los Angeles Customs Brokers and Freight Forwarders Association (LACBFFA)

Mid Valley Customs Brokers Association (MVCBA)

National Customs Brokers and Forwarders Association of America (NCBFAA)

New York New Jersey Foreign Freight Forwarders and Brokers Association

North Texas Customs Brokers and Freight Forwarders Association (NTCBFFA)

Northern Border Customs Brokers Association (NBCBA)

Pacific Coast Council of Customs Brokers and Freight Forwarders Association (PCC)

Philadelphia Customs Broker Association

San Diego Customs Brokers Association (SDCBA)

Travel Goods Association (TGA)

Washington Dulles Cargo Association (WDCA)

West Texas New Mexico Customs Brokers Association