

## **EXPORTER ACTIVITY DATA ANALYSIS**

Accessing and analyzing the U.S. government records of all company export transactions is a very useful way of identifying compliance issues. While companies may generally be aware of their export activities, it is very difficult for most companies to be completely knowledgeable of the detailed information regarding their freight forwarders and Automated Export System (AES) service providers, EINs used, Customs ports of export, merchandise origin, export value, HTSUS/Schedule B and ECCN classifications, export licenses and conditions, export destination countries, etc. Having accurate summary and detailed export information is critical in properly managing the export process. Our firm has developed a proprietary program for analyzing the government records to assist our clients in this effort.

The analysis and reports generated by our system assist companies in understanding the volume and costs of their exports. Clients use this information to identify issues, correct problems, allocate resources, and update/improve their current process. Identifying export compliance issues is critical to exercising sufficient diligence and preventing, or at least mitigating, penalties. We have significantly upgraded our software programs and have highly-trained legal assistants to efficiently manage the production of the reports.

Exporter activity data is secured from the U.S. Census Bureau in Washington, D.C. The request must be placed on Company letterhead and authorized by an appropriate Company representative. The statistical information received is based upon the AES data ("Electronic Export Information" or "EEI") that is received by Census. The data does not include information on export shipments that did not require an AES submission. Generally, this includes shipments to Canada and HTSUS line items that are less than \$2,500 in value unless a license or license exception is used. The most recent calendar year is available from Census at no cost. Additional months are available at a cost of \$125 per month.

In order to make the flat file information received from Census useful to a company, raw data is captured to produce reports, charts, and graphs. The data also allows us to analyze the many specific details of exporter activity and to identify relationships that exist between the different variables. We then communicate key issues, trends, and recommendations in a detailed management analysis report. In addition to the standardized reports, charts, and graphs, if requested, we can provide specialized reports useful in monitoring specific export activity.

For export records, our fees typically range from \$1,500 to \$2,500 for one Employer Identification Number for one year, with additional fees for each subsequent

EIN, multiple years of data, and a very significant volume of transaction activity. Normally, the report is prepared based upon the secured data from Census on one to five years for all EINs. The reports can also be run by individual years by EIN and separated by business unit. Our billings are based on the hourly rates of the two legal assistants that we trained to utilize this software and my brief review, analysis, and potential enhancement of the final results identified. Listed below is a summary of the reports that are produced in providing our analysis:

### Exporter Activity Data

1. Overall Summary – Identifies total numbers of true foreign exports and exports between the United States and Puerto Rico or the Virgin Islands, including routed transactions.
2. USPPPI EIN Usage – Identifies EINs being used as U.S. Principal Parties in Interest (USPPPI) on a company's behalf, as well as the volume and value of such exports for each USPPPI.
3. Country of Destination – Identifies destinations of exports and assists in monitoring compliance with export regulations. Detailed reports are provided to assist in licensing compliance.
4. HTSUS Usage Summary – Identifies volume and export value of products by tariff classification. Detailed reports link exports identified by HTSUS classification to country of destination, along with license codes to assist in export compliance.
5. Port of Export – Identifies forwarding agents providing service by specific port.
6. AES Filer ID Log – Identifies the party that transmits the AES transmission for the exporter. It is exactly like the very valuable Import Customs Auditor Report that confirms the parties undertaking services on your behalf.
7. Miscellaneous Reports – Summarize by volume and export value Foreign-Trade Zone identification, domestic versus foreign exports, related versus non-related party exports, mode of transportation usage, and ECCN and license usage.

A more detailed listing of Reports is attached.

### Summary

Our final Report is presented in a three-ring binder and may average approximately 375-600 pages of data (depending on the volume of transactions), with 50 pages of color graphs and charts. A detailed single space summary analysis letter averages 10 pages. CDs are also provided. If requested, we can customize our report to focus on a particular business unit or site to identify specific issues.

## EXPORTER ACTIVITY REPORTS

### EXHIBITS

- Exhibit A Overall Summary**
- **Charts/Graphs –**  
Overall Summary:
    - By Number of Export Line Items by Year
    - By Export Value by Year
  - **Reports –**  
Overall Summary  
Routed Transactions
- Exhibit B USPPI EIN Usage Summary**
- **Charts/Graphs –**  
USPPI EIN Usage Summary:
    - By Number of Export Line Items (Combined Periods)
    - By Export Value (Combined Periods)
  - **Reports –**  
Combined Presentation by Year by Number of Export Line Items  
Combined Presentation by Export Value by Year  
USPPI EIN Usage:
    - By Number of Export Line Items (Combined Periods)
    - By Export Value (Combined Periods)
    - By USPPI by Year
    - By Year by Number of Export Line Items
    - By Year by Export Value
- Exhibit C Port of Export Summary**
- **Charts/Graphs –**  
Port of Export Summary:
    - By Number of Export Line Items (Combined Periods)
    - By Export Value (Combined Periods)
  - **Reports -**  
Combined Presentation by Year  
Port of Exportation Usage:
    - By Number of Export Line Items (Combined Periods)
    - By Export Value (Combined Periods)
    - By Port Alphabetically (Combined Periods)
    - By Number of Export Line Items by Year
    - By Export Value by Year
    - By Port Alphabetically by Year
- Detailed Port of Exportation Report:  
Listing HTSUS Classification, Export Value, ECCN/License Information, Port of Export, Source/ITN Number, Mode of Transportation, EIN, and Export Date

## **Exhibit D Country of Destination Summary**

- **Charts/Graphs –**  
Country of Destination Summary:
  - By Number of Export Line Items (Combined Periods)
  - By Export Value (Combined Periods)
- **Reports -**  
Combined Presentation by Year  
Country of Destination Summary:
  - By Destination Country by Number of Export Line Items (Combined Periods)
  - By Destination Country by Export Value (Combined Periods)
  - By Destination Country Alphabetically (Combined Periods)
  - By Destination Country by Number of Export Line Items by Year
  - By Destination Country by Export Value by Year
  - By Destination Country Alphabetically by Year
  - By Year by Number of Export Line Items
  - By Year by Export Value
  - By Destination Country by HTSUS Subheading by Number of Export Line Items (Combined Periods)
  - By Destination Country by HTSUS Subheading by Number of Export Value (Combined Periods)Detailed Country of Destination Report:
  - Listing HTSUS Classification, Export Value, ECCN/License Information, Port of Export, Source/ITN Number, Mode of Transportation, EIN, and Export Date

## **Exhibit E HTSUS Usage Summary**

- **Charts/Graphs –**  
HTSUS Usage Summary:
  - By Number of Export Line Items (Combined Periods)
  - By Export Value (Combined Periods)
- **Reports –**  
Combined Presentation – Top Nine HTSUS Subheadings by Year  
Combined Presentation – HTSUS Subheadings by Year
  - By Number of Export Line Items (Combined Periods)
  - By Export Value (Combined Periods)
  - By HTSUS Number (Combined Periods)
  - By HTSUS Subheading by Destination Country by Number of Export Line Items (Combined Periods)
  - By HTSUS Subheading by Destination Country by Export Value (Combined Periods)
  - By Number of Export Line Items by Year
  - By Export Value by Year
  - By HTSUS Number by Year
  - By Year by Number of Export Line Items
  - By Year by Export Value
  - By Year by HTSUS Number

**Exhibit F Forwarding Agent Log  
AES Filer ID Log**

**Exhibit G Miscellaneous Reports**  
License Usage  
ECCN Usage  
Domestic versus Foreign Usage  
Foreign Trade Zone Usage  
Related Party Usage  
Mode of Transportation Usage

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