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## customs broker regulations update

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*MSK Client Alert*

July 13, 2020

For many months, the customs brokerage community has been expecting to see updates to the existing regulations. They finally came out in the Federal Register on June 5, 2020, see [here](#). Comments are due on or before August 4, 2020. While much of what is in the proposed revisions is not controversial and fits nicely into CBP's stated purpose to "modernize" the regulations, one update is totally out of line – and CBP should know better! For all the positive steps forward these revisions accomplish, CBP has yet again failed to comprehend the role of the customs broker. The way the proposed language is written, CBP is again trying to turn customs broker into Junior G-Men. As worded, brokers would be turned into investigators and enforcers for CBP, and that attempt alone totally undermines all the good which is otherwise accomplished, AND fails to understand the role of the customs broker in international trade!

There is a little concern about all brokers having a national permit and being regulated at the Center of Excellence and Expertise level. Increasing the filing and processing fees is also understandable as is the preference for electronic data filing. At the same time, what is particularly notable (beyond the attempt at making brokers into Junior G-Men) is the lack of anything remotely approaching the topic of continuing education. For months this was a hot topic with lots engagement between CBP and the brokerage community – and now nothing!

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