



The National Council on International Trade Development
818 Connecticut Avenue, NW, Washington, DC 20006
202-872-9280 phone • 202-872-8324 fax
cu@ncitd.org • <http://www.ncitd.org>

March 22, 2005

Mr. Michael C. Mullen
Director, Office of Trade Relations
U.S. Customs and Border Protection
Department of Homeland Security
Washington, DC 20229

RE: Need for Increased Focus on U.S. Exports

Dear Mr. Mullen:

Thank you again for attending the National Council on International Trade Development's (NCITD) trade compliance session held at the Army Navy Club on February 10, 2005. We appreciated your candor and insight. On behalf of the members and Board of Directors of NCITD, we submit this letter with the goal of beginning a constructive dialogue between the export compliance community and U.S. Customs and Border Protection (CBP), in an effort to advance the planning and deployment of export-related policies that are critical to the success of U.S. exporters in a post-September 11th world.

CBP has demonstrated both vision and leadership through the implementation of several important security programs in recent years, leading to the establishment of a number of best security practices and programs for U.S. importers. As these programs and procedures are implemented among U.S. trading partners abroad, we anticipate other nations will adopt similar security methods (*e.g.*, advance information and security seals).

However, in our view, we believe that CBP has not engaged exporters adequately in its security programs to date. To the best of our knowledge, CBP has not contacted industry representatives in order to engage in discussions to gain a better understanding of the contemporary issues associated with export shipping in the post-September 11th business

Mr. Michael C. Mullen

March 22, 2005

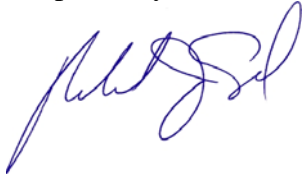
Page 2

environment. NCITD believes that engagement of exporters is clearly part of CBP's mission. NCITD and its constituents respect CBP's mandate to extend U.S. borders in the interest of homeland security, but believe the time has also come to address the growing gap between import and export policy and act on the true vision of secure and safe shipments.

In addition, the export community looks forward to the imminent staffing of an open position at CBP headquarters, which is dedicated to outbound trade policy and issues. The position of Program Officer was formerly staffed by Mr. Robert Rawls who provided outstanding guidance and advice to the export and shipping communities by clarifying policies applicable to exports. It is our understanding that this position has remained unfilled for the past six months. The position of Program Officer is critical to the partnership between the government and the business sector.

NCITD is committed to continue working in collaboration with CBP to ensure the necessities of the export shipping and ACE implementation processes are met in a fashion that serves the collective good of all parties. We welcome any opportunity to meet with you to further this dialogue. I will give you a call during the week of April 4 so we can discuss this further.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "MJ Ford", written in a cursive style.

Michael J. Ford

Chairman,

National Council on International Trade Development