



News Release

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For Immediate Release

NCBFAA Questions Parts of CBP License Exam Proposal

Washington, DC: In a [recent letter](#) to Customs and Border Protection (CBP), the National Customs Brokers & Forwarders Association of America, Inc., (NCBFAA) commended CBP for trying to modernize the customs broker examination since moving to an "electronic" examination will benefit both CBP and the trade. However, the NCBFAA noted several issues that it believes require further consideration.

The NCBFAA asked that a reference to exports in the "Purpose of the Rule" be clarified to avoid the inaccurate suggestion that CBP empowers customs brokers to assist exporters in meeting federal requirements governing exports. "Regulation of the export process has nothing to do with the performance of 'customs business' which is why a customs brokerage license is required," the NCBFAA wrote.

The target date for electronic examination and materials was another aspect of the proposal that raised a red flag. Concerned with potential technical challenges common to electronic solution rollouts, the NCBFAA believes a phased-in implementation that allows test-takers the option of taking the test electronically or in written form would be the best solution.

"This approach would allow CBP to debug the system before the electronic format becomes mandatory and allow the trade an opportunity to digest the new exam format, and therefore be better prepared, before they sign up for the examination," the NCBFAA wrote. "Thus, we suggest that CBP consider postponing the implementation date to October 2017."

The NCBFAA also inquired how the new electronic process would affect candidates' ability to use their own hard copies of CBP-approved reference materials during the exam as they do now with the written version. The proposal to adjust the examination dates to the fourth Monday in April and October is also viewed as problematic by the NCBFAA, as Monday is typically a very busy day in a custom broker's shop with "a backlog of shipments, which must be processed on Monday to avoid storage charges and other late delivery fees."

"Since the majority of test-takers will be customs brokerage employees, it would be better for the industry and the individuals taking the examination if the test could be given on another day of the week," the NCBFAA said.

The NCBFAA questioned CBP's proposed examination fee increase from \$200 to \$390. "We question the justification for this 95% increase as we believe it will deter applicants," the NCBFAA wrote, "and have a significantly adverse impact on persons contemplating taking the customs broker examination."

In conclusion, the NCBFAA encouraged CBP not to eliminate the ability for a "special examination" under the rules to accommodate unforeseen systemic situations that may adversely affect the ability of test-takers to complete the test on the scheduled date.

Headquartered in Washington, DC, the NCBFAA represents more than 1,000 member companies with 110,000 employees in international trade - the nation's leading freight forwarders, customs brokers, ocean transportation intermediaries (OTIs), NVOCCs and air cargo agents, serving more than 250,000 importers and exporters. Established in 1897 in New York, NCBFAA is the effective national voice of the industry. Through its various committees, counsel and representatives, the Association maintains a close watch over legislative and regulatory issues that affect its members. It keeps them informed of these and other related issues through its weekly Monday Morning eBriefing, and various meetings and conferences throughout the year.

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