

“SHAP” TALK

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TRADE NEWS

Customs to Issue Penalties for Violation of WPM Rules

U.S. Customs & Border Protection (CBP) has issued a press release stating effective March 9, 2007, CBP may issue claims for liquidated damages and/or penalties against importers for violation of wood packaging material (WPM) regulations.

The WPM regulations were published in September 2004 with an effective date of September 2005. Customs phased in the enforcement over several months with full enforcement coming into effect in July 2006. Yet even with a year from publication of the rule to implementation and another ten months for phased enforcement, CBP and USDA continue to find several dozen shipments a day with violative WPM.

All WPM entering or transiting the United States must be properly marked to indicate it has been either heat treated or treated with methyl bromide in accordance with ISPM 15 (International Standards for Phytosanitary Measures) standards. To certify treatment, the WPM must be marked with the approved International Plant Protection Convention (IPPC) logo. Unmarked WPM will be considered untreated and non-compliant, and must be either re-exported or separated from the cargo at the importer's expense. For cargo that must be re-exported, many steamship lines now require a letterhead statement from the foreign shipper that they will accept the returned goods.

When violations occur, liquidated damages and/or penalties will be assessed based on the value of the merchandise. The liquidated damages claim could be up to three times the value of the goods, but not greater than the amount of the importer's customs bond.

The CBP press release is available at:

http://www.cbp.gov/xp/cgov/newsroom/news_releases/03082007_5.xml

DR-CAFTA Effective March 1, 2007 for Dominican Republic

The U.S.-Dominican Republic-Central America Free Trade Agreement Implementation Act ("the Act"; Public Law 109-53; 119 Stat. 462; 19 U.S.C. 4001 note) was signed into law on August 2, 2005. The Act allowed for the agreement to take effect, upon determination by the President, for those countries that have taken measures to comply with the requirements of the agreement. The agreement is in effect for goods of El Salvador effective March 1, 2006, Nicaragua and Honduras effective April 1, 2006, and Guatemala which entered into force effective July 1, 2006.

The President issued a Proclamation implementing the U.S. – Dominican Republic – Central America Free Trade Agreement (DR-CAFTA) for goods of the Dominican Republic entered, or withdrawn from warehouse for consumption, effective on or after

March 1, 2007. DR-CAFTA is now in force for five of the six signatory countries.
<http://www.whitehouse.gov/news/releases/2007/03/20070301.html>

Effective with respect to goods that are entered, or withdrawn from warehouse for consumption, on or after March 1, 2007, the Dominican Republic no longer qualifies for GSP, CBERA or CBTPA.

The United States International Trade Commission (USITC) has issued Publication #3901 dated February 2007, Modifications to the Harmonized Tariff of the United States to Implement the Dominican Republic-Central-America-United States Free Trade Agreement With Respect to the Dominican Republic.
http://www.usitc.gov/tata/hts/other/rel_doc/annex/documents/3901ModificationsDominicanRepub_fullreport.pdf

Section 205 of the DR-CAFTA provides for the “*retroactive application*” of the preferential tariff provision of the Agreement to qualifying textile or apparel goods of eligible DR-CAFTA countries that were entered or withdrawn from warehouse for consumption on or after January 1, 2004, and before the date of entry into force of the Agreement, with respect to that country. CBP previously established by regulation, that such requests for “*retroactive refunds*” would be accepted until December 31, 2006 or 90 days after the entry into force of the Agreement with respect to that country, *whichever is later*. CBP announced in TBT-06-027 administrative notice that the time frame for filing of “*retroactive claims*” under the DR-CAFTA was extended and can be filed with CBP up until 90 days that the “*last signatory country*” enters into the Agreement for that country or any other DR-CAFTA country. Costa Rica has not yet ratified the agreement.
http://www.cbp.gov/linkhandler/cgov/import/textiles_and_quotas/tbts/tbt2006/tbt_06_027_01.ctt/tbt_06_027_01.doc

Please contact Samuel Shapiro & Company Inc. Compliance Department if you require additional information concerning retroactive claims under the DR-CAFTA.
compliance@shapiro.com

Previous USITC publications for El Salvador, Honduras and Nicaragua, and Guatemala are available at:

Publication 3829 for El Salvador, effective date 3/1/06:
http://usitc.gov/tata/hts/other/rel_doc/annex/PUB3829.pdf

Publication 3845 for Honduras and Nicaragua, effective date 4/1/06:
http://usitc.gov/tata/hts/other/rel_doc/annex/PUB3845.pdf

Publication 3861 for Guatemala, effective 7/1/06:
http://usitc.gov/tata/hts/other/rel_doc/annex/PUB3861.pdf

Sources: <http://www.whitehouse.gov/> (news and proclamations); U.S. Customs and Border Protection; United States International Trade Commission Publication 3901

Container and Trailer Security

Whether or not you are a member of the Customs-Trade Partnership Against Terrorism (C-TPAT), the security of your containers and trailers is vital to your supply chain. Do you know who is loading your containers? What kind of security measures does the loading party have in place? Is the container being inspected prior to loading? U.S. Customs & Border Protection (CBP) recommends a 7-point inspection process. The seven points are:

1. Front wall
2. Left side
3. Right side
4. Floor
5. Ceiling/roof
6. Inside/outside doors, including locking mechanisms
7. Outside/undercarriage

The party loading the container must ensure there are no damages to the container, no false panels, and certainly that no person or unauthorized materials are inside the container.

Once the container is loaded, a high security seal meeting or exceeding PAS ISO 17712 standards must be affixed. Your supplier should have a trusted, designated individual for controlling and affixing container seals. The fewer people who have access to seals the better. Unauthorized employees should never handle container seals. Once the seal is affixed, the designated employee should pull down on it to make sure it is secure. The authorized employee should also twist and turn the seal to make sure it does not open. The seal number must be recorded on the shipping documents. If it appears that the seal or container has been compromised, your supplier should have a procedure in place to contact the appropriate foreign authority.

When you receive the container, you must check the seal number against the shipping documents. Give the seal a tug and a twist to make sure it is secure prior to cutting it off the container. What would you do if the seal number on the container did not match the seal number on the documents? What would you do if it appeared the seal or the container had been tampered with? If your containers are delivered to a third party warehouse, have you given them instructions what to do in the event of a seal number mismatch or if there is evidence of tampering? If the seal number does not match, please call Samuel Shapiro & Company, Inc. so we can check our records. If there is no logical explanation (such as a Customs exam) or if the seal appears to have compromised, you need to have a procedure in place to contact CBP. If you discover unauthorized personnel, un-manifested materials, or signs of tampering, local law enforcement and/or CBP should be notified as appropriate.

Customs also has a 17 point inspection process for tractor trailer shipments (more common in border crossings). The 17 points are:

- | | |
|------------------------------|---------------------------|
| 1. Bumper | 10. Outside/Undercarriage |
| 2. Engine | 11. Floor |
| 3. Tires (truck and trailer) | 12. Inside/outside doors |
| 4. Floor | 13. Side Walls |
| 5. Fuel tanks | 14. Ceiling/roof |
| 6. Cab/storage compartments | 15. Front wall |
| 7. Air tanks | 16. Refrigerated unit |
| 8. Drive shafts | 17. Exhaust |
| 9. Fifth wheel | |

If you are a C-TPAT member, have you checked out your portal account recently? Did you know Customs has posted a number of helpful documents in the C-TPAT Public Document Library? The documents include presentations from the 2006 C-TPAT conference. 2007 C-TPAT conference documents will also be posted.

If you are not a C-TPAT member and are interested in more information, please contact us at consulting@shapiro.com. Be sure to check out Samuel Shapiro & Company, Inc.'s 2007 C-TPAT workshops. See below for more details.

Vietnam to Require Licenses for Apparel Exports

The Vietnamese Ministry of Trade has announced that exports of certain apparel articles from Vietnam to the United States will be subject to export licensing requirements. U.S. Customs & Border Protection will not be requiring a copy of the license for the import entry, but could ask to review the license if there were a question of origin verification.

The Ministry of Trade states its objective in requiring the license is “to better manage the export growth, establishment of export markets, ensuring stable and durable development, protecting long-term interests of apparel exporters, fighting against illegal trans-shipments and fraud trading.”

The U.S. International Trade Administration is monitoring five product categories from Vietnam – trousers, shirts, sweaters, swimwear, and underwear – to determine if a self-initiated antidumping investigation is warranted. The export licenses will allow the Vietnamese government to monitor these categories of apparel, also, although the Ministry of Trade states that the categories for licenses are subject to change.

The HOPE Act to Benefit Haiti

President Bush has declared Haiti a beneficiary country eligible for favorable trade benefits, as he has determined that Haiti has met the conditions established by the Haitian Hemispheric Opportunity through Partnership Encouragement Act (HOPE).

As a beneficiary country under this program, Haiti is eligible for duty-free treatment for certain apparel articles as well as certain wire harness automotive components. The decree mandates the same political, economic and labor criteria, and the same textile and apparel transshipment requirements, as the African Growth and Opportunity Act (AGOA).

The designation is intended to encourage textile and apparel production in Haiti by loosening the rules of origin and establishing a new tariff preference level (TPL) for woven apparel. This TPL will be set at 50 million square meters equivalent in years one and two, and 33.5 million square meters in year three.

The HOPE Act will bring critical trade benefits to the nation as well as strengthen the ties between the United States and Haiti.

Bond Insufficiency Notice from CBP

Recently U.S. Customs and Border Protection (CBP) posted a notice to their website concerning bond insufficiency. There are several reasons why a bond may be rendered insufficient. For example, an outstanding debt issue related to any of the entities on the bond, failure to comply in a timely fashion with a formal demand letter from CBP to increase the bond, and use of an invalid importer of record number on the bond (e.g., an entity using an EIN that is not assigned to that party by the IRS) are just a few.

In this notice, CBP has outlined additional reasons for bond insufficiency. The first is in reference to “Deferred Payment.” CBP states that importers who participate in the deferred payment of IR tax must have approval to do so from the surety company on their Customs continuous bond. Failure to have such approval on file with Customs may result in the importer’s bond being rendered insufficient. Importers should contact the company that wrote their continuous bond, obtain a copy of the surety approval and be sure that a copy has been submitted to CBP.

The second issue is “Invalid Addresses.” Since July 2005, CBP has spent considerable resources in an attempt to obtain corrected, valid addresses when the U.S. Postal Service returns mail to CBP as “undeliverable.” After analyzing the situation, CBP has found that past processes have been found to be inadequate and insufficient in obtaining corrected addresses. As a result, CBP will handle insufficient addresses in the following manner. Upon receipt of mail returned as “undeliverable,” CBP will render the continuous bond insufficient immediately. For this reason it is extremely important for importers to notify their Customs broker of any changes in address. Once the corrected address is obtained, a completed CF 5106 and bond rider must be submitted to CBP in order for the bond to be returned to sufficient status.

The final issue addressed in the bond insufficiency notice has to do with importations by U.S. importers into to the U.S. Virgin Islands (USVI). Importers must have a valid

bond rider in order to make entry into the USVI or risk having the bond rendered insufficient.

The CBP notice can be viewed at the following link:

http://www.cbp.gov/linkhandler/cgov/import/communications_to_trade/pilot_program/insufficiency.ctt/insufficiency.doc

State Department Returning 20% of Licenses without Action

The Directorate of Defense Trade Controls (DDTC) under the U.S. Department of State has issued an alert advising the trade community that they have returned without action (RWA) 20% of all license applications since December 1, 2006 due to low-quality applications. In the past, the State Department gave latitude for correcting certain errors on applications, but it is now the policy of DDTC to no longer correct low-quality applications. In the message to the trade, the State Department gives examples of items where applications have been returned without action.

Examples:

- ◆ The country name on a license application does not match the country on the supporting documentation.
- ◆ No purchase order attached to a license application.
- ◆ The value on the license application is not the same as the value on the purchase order.
- ◆ Technical Assistance Agreement (TAA) requests to change the terms of other companies' TAAs.
- ◆ Submission of agreements and agreement amendments without submission of an original empowered official certification letter.
- ◆ Proposing to provide defense services to a foreign government without a TAA.
- ◆ Submission of agreements and agreement amendments without the required Part 130 statement.
- ◆ Continually making late applications and evoking (without adequate justification) national security reasons for immediate case adjudication.
- ◆ Submitting multiple TAAs and licenses when one TAA would do.
- ◆ Poorly documented commodity jurisdiction requests.
- ◆ Incomplete and deficient registration requests.

DDTC warns exporters that these examples of the errors noted above demonstrate a lack of basic understanding of export control standards and a potentially inadequate compliance program. Exporters should be aware that low-quality applications can have a real impact on their business. This message from DDTC is dated 2/26/07 and can be accessed on the Directorate of Defense Trade Controls website located at: http://www.pmdtct.state.gov/low_quality_applications.htm

Unacceptable File Attachments to D-Trade Applications

The Directorate of Defense Trade Controls (DDTC) licensing division issued an update on March 7, 2007 advising that they are able to accept most files types and formats submitted as part of a D-Trade application. But industry users should bear in mind that .zip files are not acceptable, nor are submissions containing executables (.exe). Applications with either of these types of documents will be rejected or Returned without Action. DDTC will also reject or Return without Action any D-Trade application that they feel contains an attached file that is not in an acceptable format or in some way is deemed inappropriate or could adversely affect the D-Trade System. DDTC reminds users that use of searchable .pdf is preferable for attachments.

If there are any questions, please contact the D-Trade Help Desk for further information. http://www.pmdtcc.state.gov/sl_dtrade.htm

FDA and EPA Seek Comments on Regulation of Insect Repellent-Sunscreen Products

The Environmental Protection Agency (EPA) and the Food and Drug Administration (FDA) are seeking comments by May 23, 2007 to determine how insect repellent-sunscreen combination products should be regulated. They are inviting comments on issues such as labeling, product performance and applicable safety standards for all currently and future registered insect repellent-sunscreen combination products.

The EPA regulates the insect component of these products while the sunscreen component is regulated by the FDA.

Both the FDA and EPA source documents are published in the Federal Register, February 22, 2007 (Volume 72, Number 35) pages 7941-7945 and pages 7979-7983, respectively.

<http://frwebgate2.access.gpo.gov/cgi-bin/waisgate.cgi?WAISdocID=620472228558+0+0+0&WAIAction=retrieve>

<http://frwebgate1.access.gpo.gov/cgi-bin/waisgate.cgi?WAISdocID=620858490269+0+0+0&WAIAction=retrieve>

Instructions for submitting comments and references to the corresponding docket numbers are included in the FR notices.

Source: Federal Register, February 22, 2007

COMPLIANCE CORNER

Recent Export Compliance Penalties

Export Compliance Responsibilities must be in the forefront for all exporters. This is just a short note to our exporters regarding recent penalty cases as a reminder of the importance of export compliance. These quick bullet points show the recent penalties that have been paid by exporters for various violations.

- ◆ \$450,000 fine for failure to file AES transmissions on exports.
- ◆ \$25 million criminal fine, a requirement to implement and maintain an effective compliance and ethics program, and five years' probation for funding a designated terrorist organization.
- ◆ \$30,000 civil penalty and a 20-year denial of export privileges for unlicensed export to the UAE.
- ◆ \$66,000 civil penalty for activities related to illegal export to Beijing.
- ◆ \$30,800 penalty for unlicensed export to India and to a listed entity for use on an Iranian aircraft.
- ◆ Possible fine of \$100 million to resolve U.S. charges the company violated export control rules by allowing the transfer of night-vision technology to China.
- ◆ \$75,000 fine and debarred from participating directly or indirectly in any activity regulated under the International Traffic in Arms Regulations (ITAR) until December 12, 2007.

These penalties are quite large and could have a huge impact on an exporter. Please be sure your company fully realizes how essential it is to have a good export compliance program in place. If you would like more details on these cases, please contact compliance@shapiro.com.

TRANSPORTATION NEWS

Growing Pains Mount as Growth in Chinese Exports Explode

Industry leaders in the Trans-Pacific trade lane met recently in Long Beach, CA for the 7th Annual Trans-Pacific Maritime Conference. Samuel Shapiro & Company, Inc. attended, gleaned information from our Chinese counterparts who spoke at the Conference regarding the challenges that industry professionals are experiencing in China.

China has recently emerged as the third largest trading country in the world and reports an export surplus of \$177 billion. China also produces almost 50% of the world's garments. With this growth, China is now experiencing a significant shortage of trained staff in the logistics industry. Language and cultural barriers present daily challenges with logistic professionals in China where the concept of teamwork has presented quite a challenge. Since the cost of obtaining a license to open a homegrown logistics firm is expensive, many professionals find themselves working for

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foreign based companies. Today, the logistics industry remains fragmented and largely regional in China.

Accounting practices within Chinese firms are challenged by the complexities of logistics businesses. Multiple invoices for multiple functions are quite common. Bad debt totaling 5% of the total amount billed is the norm. There is a 3% tax on transportation expenses, and profit taxes on the logistics industry are anywhere from 15 to 33 %.

Truck overloading has also become a problem in China. Seventy percent of all traffic accidents are attributed to overweight cargo and overloaded trucks resulting in 200,000 fatalities in the past year alone. Trucks routinely move four times their legal weight limit. Unfortunately, China has been slow to regulate. In the coming year it is likely there will be more stringent laws passed to protect the citizens of China. Road usage fees have increased in an effort to pay for the rising costs of expanding the infrastructure.

The majority of warehousing facilities in China continue to remain sub-standard as compared to the United States. The majority of Chinese Logistics firms still do not handle Dangerous Goods due to the difficulty in getting a license to do so and requirements can vary from region to region.

Proposed California Container Fee for Pollution Control

The Federal government is committed to helping the freight sector grow while reducing harmful diesel emissions. As California has been experiencing the most serious environmental hazards, the state is considering a new bill that will call for a \$30-per-container fee for all containers passing through California ports in an effort to pay for pollution-reducing measures. This past November, California voters approved a bond issue that includes \$2 billion for cargo movement and \$1 billion for pollution reduction.

Market Outlook for the Trans-Pacific Trade

As reported at the recent 7th Annual Trans-Pacific Maritime Conference in Long Beach, the year 2006 saw Asia-to-USA container demand grow by 10%. Container shipping growth is rising 3 times faster than the U.S. GDP growth and the volumes are expected to double in the next five years. The supply-demand gap is narrowing quickly and the trade expects to see increased rates in 2007 to 2008. In 2009, the industry expects to see an even higher spike in rates. The largest vessels that were to increase capacity continue to be dedicated to the USA-Europe trade as that trade has seen an even higher increase in demand and incurred heavy rate increases in 2006.

Inter-modal rates are expected to increase substantially this year due to increased rail costs intended to cover the necessary improvements in infrastructure – this in an effort to meet the ever-increasing demands and volumes from the trade. Fuel costs are

a great concern; as a result, carriers are tending to back away from inter-modal business.

U.S. west coast ports are straining to keep pace with the demands. Southern California in particular faces many challenges; overloaded capacities are commonplace at these ports. The Los Angeles/Long Beach market share will continue to erode if inter-modal capacity is not addressed.

Pacific Northwest ports have seen the most growth; although Vancouver is continuing to experience delays.

U.S. east coast ports have recently become more attractive to the Trans-Pacific trade where demand is high. Carriers are also now looking ahead to the development of Mexican-Pacific ports with greater interest as Mexico expands its infrastructure to become a more viable option for U.S. bound cargo.

The Department of Homeland Security (DHS) is pushing forward with the Secure Freight Initiative and is hoping for 100% scanning of import cargo. The trade industry is working closely with DHS to make certain that these changes do not become a major hindrance to U.S. import commerce.

TSA Announces Rate Forecast for 2007-2008 for Trans-Pacific Import Trade

The Transpacific Stabilization Agreement (TSA) which comprises the major carriers in the Trans-Pacific trade (APL, CMA, COSCO, Evergreen, Hanjin, Hyundai, K-Line, Mitsui, NYK, and OOCL) recently announced price increases for the coming year.

TSA reports that on average, the carrier's total cost increased by 7% in 2006, yet the rate in the trade had decreased somewhat over that same year; resulting in reported losses for most of the carriers. The carriers saw their rail and truck costs increase by a full 25% in that same period. Due to record volumes of imports, unprecedented volumes of containers had to be re-positioned to accommodate the requirements of the customers.

Due to the increased costs on the carriers, the TSA has announced that importers can expect price increases of roughly \$150/FEU for shipments bound to U.S. West Coast ports; \$350/FEU for inter-modal shipments bound for the U.S. interior & MLB to US East Coast; and \$400/FEU for U.S. East Coast (direct) port bound cargo.

Transportation Update – April 2007

Canada

Canadian National and Canadian Pacific rail lines have been hit by rockslides, mudslides and flooding in the mountain passes of British Columbia, delaying their efforts to clear the backlog of containers at the Port of Vancouver. It will take some time to resolve. They are working diligently to increase the railcar fleet to handle the

port traffic. In March they added two to three additional trains per week to the schedule.

South America

APL-MSC-MOL Announces Cooperation in US-South America Trade

APL has announced a new cooperation with Mediterranean Shipping Company and Mitsui OSK Lines, to take effect in April 2007. The service is weekly and calls Norfolk, Philadelphia, New York and Baltimore in the U.S., and Santos, Buenos Aires, Rio Grande, São Francisco do Sul, and Salvador on the east coast of South America. APL and Mitsui will discontinue the existing co-operation with Maersk Line on the NASA service, which will exit the trade after its last sailing from Santos on April 14th.

Northern Europe

TACA announces rate increase

Trans-Atlantic Conference Agreement has announced plans to raise tariff rates effective April 1, 2007. This is to offset the decrease in rates last year. The current rates are unsustainable in relation to the level of service required. The rates on westbound traffic from Northern Europe to U.S. Atlantic, Gulf and Pacific ports will increase \$320.00 for 20' and \$400.00 for 40' and 45' containers. Maersk, MSC, ACL, NYK and OOCL are the members of TACA.

Spain - Fumigation costs increasing

There will be some drastic changes being implemented by the Ministry of Agriculture in Spain due to recent pier inspections of the fumigation process. Fumigation costs are expected to double from EUR 85.00 - 95.00 to EUR 180.00 - 200.00. There will also be changes in cut-off times, yet to be determined, and surely delays at the port until procedure becomes routine.

Air Cargo

Airfreight volumes are down due to high fuel costs and increased competition in sea freight. There was an increase in January, but still not any significant growth. The Middle East according to the International Air Transport Association (IATA) had the strongest growth. IATA still expects airfreight to improve in 2007.

SAMUEL SHAPIRO & COMPANY, INC. NEWS

News from Our Baltimore Office

Why bring your cargo to Baltimore? The numbers speak for themselves.

Do you know the port average for container moves per hour in your port? Container moves refer to the loading and unloading of containerized cargo to or from a ship. The national average container moves per port is in the mid 20's to mid 30's. The productivity of Seagirt Marine Terminal in Baltimore, MD has a record breaking 40 container moves per hour!

Seagirt Marine Terminal is currently the number one port for the importation of trucks, forest products and gypsum. Of the 361 ports within the United States, the Helen Delich Bentley Port of Baltimore is ranked 13th for overall tonnage and 12th for value of cargo that is entered.

With these numbers, it's no surprise that the Port of Baltimore is considered one of the top ports in the nation. The Port of Baltimore continually strives to maintain upward momentum.

Have you registered for Shapiro's C-TPAT workshop?

Don't miss out on this one-of-a-kind seminar that will empower you to handle your company's C-TPAT application and save thousands! If you want to become a member, but you are not sure how to get started, this is the workshop for you. We will show you what information should be included in your security profile and help you navigate through the Customs C-TPAT portal. And better yet, if after the workshop you decide that you still need assistance with your C-TPAT application, Shapiro will deduct your seminar fee from our C-TPAT proposal. It's a win-win!

Samuel Shapiro & Company, Inc. is kicking off its 2007 C-TPAT workshop series on Thursday, May 3, 2007, from 9:00 a.m. to 3:00 p.m., at the Four Points by Sheraton - BWI Airport. The next workshop will take place on June 14, 2007, from 9:00 a.m. to 3:00 p.m., at the Down Town Club in Philadelphia, PA. Shapiro will also host a C-TPAT workshop in Atlanta, GA in October 2007; date and location to be announced.

The C-TPAT workshop will provide importers with the tools to effectively evaluate the security of their supply chains, analyze the results, communicate with business partners, and develop improvement plans. We will supply you with step-by-step instructions plus the materials to create your own security profile and application for admission to C-TPAT!

Seminar Locations:

May 3, 2007
Baltimore, MD

Four Points by Sheraton - BWI Airport
7032 Elm Road
Baltimore, Maryland 21240
Hotel Phone: (410) 859-3300

June 14, 2007
Philadelphia, PA
Down Town Club in Philadelphia, PA
6th & Chestnut Streets
Philadelphia, PA 19106
Hotel Phone: (215) 925-2040

October 2007
Atlanta, GA
(Exact date and location to be announced)

Cost (includes seminar materials, lunch, and refreshments):

\$450 per person

Click on the link below to register today!

<http://www.shapiro.com/html/SeminarCTPATWorkshop3May2007.html>

If you have any questions or would like to register by phone, please contact compliance@shapiro.com or by phone at 800-695-9465, ext. 290.