

November 4th 2008

Stephen Bill
Head of Cabinet of Commissioner Kovács
Taxation and Customs Union Directorate General
European Commission
Rue Joseph II, 70
B-1049 Brussels

Re: AmCham EU letter supporting the EABC letter to the European Commission on the United States Notice of Proposed Rulemaking Importer Security Filing and Additional Carrier Requirements (the “10 + 2” rule)

Dear Sir,

I am writing you to request that the European Commission communicate with the U.S. Office of Management and Budget (OMB) in connection with its review of the U.S. Customs and Border Protection (CBP) proposed rule on Importer Security Filings (the 10+2 Rule). Members of the American Chamber of Commerce to the EU (AmCham EU) have been active in supporting the joint effort of the industry to achieve improvements to and/or a pilot program of the proposed “10 +2” rule. AmCham EU would like to provide its support to the attached European-American Business Council (EABC) letter and share concerns about the rule.

It would be helpful and appropriate for the European Commission to communicate with the OMB and to restate your position on the proposed rule. In its comments in the rulemaking, the EC expressed a recommendation that the U.S. not go forward with the proposed rule, which represents a unilateral approach to shipping data collection that would be less effective than a global approach and would likely impede trade without achieving improved security. This position is as valid today as it was when the EC filed its comments on this rule.

We remain committed to increasing the international security of trade and have provided alternative methods to achieve that end goal without unduly burdening legitimate trade. We are now turning to you for your leadership in what is fundamental to security and efficiency of trade.

Best regards,



John Vassallo
Chair of the American Chamber of Commerce to the EU (AmCham EU)



European-American Business Council

"Investment ~ Innovation ~ Integration"

October 6, 2008

Stephen Bill
Chef de Cabinet
Directorat General for Taxation and Customs Union
European Commission

RE: United States Notice of Proposed Rulemaking Importer Security Filing and Additional Carrier Requirements

Dear Sir,

On behalf of the European-American Business Council, I am writing to request that the European Commission communicate with the U.S. Office of Management and Budget in connection with its review of the U.S. Customs and Border Protection (CBP) proposed rule on Importer Security Filings (the 10+2 Rule). On March 17, 2008, the European Commission did file comments on behalf of the European Union in the rulemaking process at the Department of Homeland Security. However, on behalf of the President, OMB exercises a separate and independent review of proposed rules.

The OMB review of this rule provides all parties with another opportunity to present their concerns to the U.S. Government. As a result, companies, trade associations, and other U.S. Executive Branch Departments are all communicating with OMB to express their concerns about the rule. It would be helpful and appropriate for the European Commission to write to OMB and to restate your position on the proposed rule. The position of the European Union would have significant weight at OMB and could prove to be very important.

In your comments in the rulemaking, the EU expressed a recommendation that the U.S. not go forward with the proposed rule, which represents a unilateral approach to shipping data collection that would be less effective than a global approach and would likely impede trade without achieving improved security. This position is as valid today as it was when the EU filed its comments on this rule.

Best regards,

Michael C. Maibach
President & CEO
European-American Business Council



European-American
Business Council

EABC Membership 2008

<i>ADM</i>	<i>Deutsche Telekom</i>	<i>Nokia</i>
<i>Adobe Systems</i>	<i>DHL</i>	<i>Nortel</i>
<i>Albemarle</i>	<i>EDS ~an HP Company</i>	<i>Northrop Grumman</i>
<i>Amgen</i>	<i>Ericsson</i>	<i>NXP Semiconductor</i>
<i>Apple</i>	<i>Ernst & Young</i>	<i>Oracle</i>
<i>Applied Materials</i>	<i>Global Sourcing Services</i>	<i>Pfizer</i>
<i>AstraZeneca</i>	<i>Grant Thornton</i>	<i>Philips Electronics</i>
<i>AT&T</i>	<i>Hogan & Hartson</i>	<i>PwC</i>
<i>Avon</i>	<i>IBM</i>	<i>Qualcomm</i>
<i>Battelle</i>	<i>Intel</i>	<i>Salesforce.com</i>
<i>Boehringer Ingelheim</i>	<i>Iridium Satellite</i>	<i>SAP</i>
<i>Boeing</i>	<i>Johnson & Johnson</i>	<i>Telecom Italia</i>
<i>Bayer</i>	<i>Kodak</i>	<i>Telefonica</i>
<i>BDO</i>	<i>KPMG</i>	<i>Texas Instruments</i>
<i>BP</i>	<i>Kreab</i>	<i>Tyco Electronics</i>
<i>BT</i>	<i>Lilly</i>	<i>Unilever</i>
<i>Chevron</i>	<i>LoJack</i>	<i>US Steel</i>
<i>Chrysler</i>	<i>LyondellBasell</i>	<i>VeriSign</i>
<i>Cisco Systems</i>	<i>Micron</i>	<i>Verizon</i>
<i>Covington & Burling</i>	<i>Microsoft</i>	<i>Visa</i>
<i>Daimler</i>	<i>MOL Group</i>	<i>Volkswagen</i>
<i>Dell</i>	<i>Monsanto</i>	<i>Xerox</i>
<i>Deloitte</i>	<i>Monster Worldwide</i>	
<i>Deutsche Bank</i>	<i>Motorola</i>	
<i>Deutsche Post World Net</i>	<i>National Semiconductor</i>	