

Sea AMS Activity Overview						
Environment	Cargo Manifest by NVOCC	Cargo Manifest VOCC	Carrier/Terminal Visibility of MBL/HBL Match	Vessel Arrival	PMIB Authoriz	HBL for AMS/ABI
24-Hour Rule (existing)	X			X	X	X
Option 1 (Special Bill proposal)	X	X	X			
Option 2 (Alternate proposal)	X	X	X		Optional	X

24-Hour Rule:

Under the Rule, AMS automated NVOCCs must perform all functions of Sea AMS carrier, not only the advance Cargo Manifest for security purposes, but also Vessel Arrival independent of the underlying VOCC's arrival processing.

Similarly, based on existing AMS programming, only the AMS carrier manifesting may perform PMIB processing. This allows only the AMS automated NVOCC, therefore, to perform PMIB processing. If the AMS NVOCC cannot secure PMIB authorization, then his only recourse is manual paper processing of PTTs, ITs, etc.

Under the Rule, the NVO B/L (HBL) Number is the primary matching data element between AMS manifesting and ABI entry.

Option 1:

In order to address the operational disconnects between AMS processing and terminal release at the HBL# and VOCC B/L (MBL)#, respectively, Option 1 would close out the HBL record upon AMS-validated match with corresponding MBL record. HBL record would be limited to "security review only." AMS automated NVOCCs would revoke PMIB authorization as afforded to NVOCCs under the 24-Hour Rule and return to the MBL# as the primary data element for ABI entry.

**Option 1 is objectional to AMS automated NVOCCs that are the final stages of AMS implementation, incl. PMIB documentation.**

Option 2:

Option 2 incorporates the AMS technical modifications of Option 1 to validation & match MBL# & HBL# data in AMS. Instead of reverting to the MBL data for all subsequent activity, Option 2 - on the basis of the MBL/HBL data match - proposes:

- 1) AMS Vessel Arrival by the VOCC only. VOCC would arrival MBL and AMS would "cascade" the Arrival milestone to all matched HBLs;
- 2) Flexibility in terms of who creates PMIB documentation: If AMS NVOCC is PMIB authorized, then NVOCC would be authorized to issue paperless IT against HBL#; if AMS NVOCC is not PMIB authorized, then underlying VOCC would be authorized to issue paperless IT against MBL# already matched against associated HBL.
- 3) HBL Number to remain as the primary matching data element for AMS/ABI activity.

Option 2 addresses the objections to Option 1 by affording PMIB authorization to those NVOCCs seeking it and maintaining HBL as primary matching data element for AMS/ABI activity.

At the same time, it does not require AMS NVOCCs from becoming PMIB authorized; if they don't, the VOCC processing PMIB documentation.

Additionally, Option 2 addresses the concerns of AMS automated NVOCCs under the 24-Hour by transferring data matching between MBL and HBL to AMS itself. With full MBL/HBL cross-reference & visibility, the disconnect between NVOCC, VOCC and terminal is remedied.

Similarly, Option 2 also frees AMS NVOCCs from the unnecessary duplicate work of arriving their Vessel/Voyage records in AMS.