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APPENDIX D: DESCRIPTION OF COORDINATION PROBLEMS AND ALTERNATIVES

PLANNING

C-1. Inadequate Long-Term Planning Strategy for Border Crossings

Description of Issue/Problem

Binational port planning is not coordinated to include all U.S. and Mexican agency and private-sector requirements. There is no long-term strategy for border system planning, or planning is dependent on the inclinations of senior U.S. and Mexican officials. Trade practices and new technologies may not be taken into consideration during the planning process.

Alternative

Develop medium- and long-range plans for port of entry and binational planning that involve all U.S. and Mexican public agency and private-sector stakeholders.

Future Needs

Develop a border-wide planning handbook for use by public agencies in Mexico and the United States. This handbook would provide detailed profiles of all U.S. and Mexican commercial land ports. At minimum, each profile should include U.S. and Mexican port layouts specifying traffic flows, processing points, bottlenecks, and lane designations; detailed data on two-way truck movements (by empty/bobtail and loaded trucks) and average delay times; an inventory of NII equipment, ITS technology, DOT installations, dock capacity (utilized and dormant), and other port facilities; human resource capabilities of the various agencies working at the port; and the operational schedules of those agencies and the border bridge/roadway. This document would constitute a comprehensive, updated compilation of strategic border planning information that is currently fragmented among U.S. and Mexican Customs, the General Services Administration, the Department of Transportation, and a myriad of other public agencies in the United States and Mexico. The report would build off previous efforts of a smaller scale such as the General Service Administration’s Summary of Existing and Proposed

The operation of separate U.S. and Mexican land ports along their shared border results in considerable duplication of systems, activities, and infrastructure. The potential operational, financial, and security benefits of developing joint border facilities is substantial. However, special provisions would be necessary for the construction and operation of binational border ports. Research aimed at defining the political and operational requirements for development of joint border facilities at remote, low-volume crossings between the United States and Mexico is timely in light of current plans to expand the number of border gateways.

**R-1. Inadequate Incentives for Participation in Pre-Clearance Programs**

*Description of Issue/Problem*

Inconvenient enrollment structures and lengthy U.S. pre-primary wait times for pre-approved traffic have diminished private-sector participation in pre-clearance programs and reduced program effectiveness. The U.S. Customs Service has taken a leadership role in the development or oversight of many incentive programs, which aim to improve compliance, reduce smuggling and terrorism threats, and enhance the speed and efficiency of the commercial border-crossing process. Success of the Border Release Advanced Screening and Selectivity (BRASS) program, the Carrier Initiative Program (CIP), the privately-run Business Anti-Smuggling Coalition (BASC), and the Customs Trade Partnership Against Terrorism (C-TPAT) is contingent upon their ability to provide tangible benefits to participants.

BRASS is an anti-narcotics smuggling initiative developed to expedite the release of compliant shipments into the United States from Mexico and Canada. Certified shippers are not required to pre-file import documentation or undergo U.S. secondary inspections in most instances. Freed-up inspection resources focus on unknown shipments and those requiring a closer examination. In order to qualify for enrollment in BRASS, Mexican shippers are required to have a 90 percent (or higher) Customs compliance record over the past year, export a minimum of 50 truckloads to the United States annually, and utilize security-certified CIP carriers.

BASC is an industry-led program intended to deter the use of commercial conveyances as a means of narcotics smuggling across international borders. Participants agree to implement
various security measures and procedures in exchange for more lenient treatment by Customs in the event that one of their shipment containers or trailers is utilized by drug traffickers to import contraband into the United States.

C-TPAT is also designed to strengthen supply-chain and border security by requiring participants to incorporate infrastructure, personnel, and procedural security elements into their businesses. Like participants in the BRASS and CIP programs, C-TPAT members receive fewer inspections at the port of entry and are eligible for consolidated, account-based processing. Despite an abundance of large shippers and highly repetitive movements through U.S.-Mexico commercial gateways, BRASS enrollment in Mexico is small vis-à-vis Canada.

According to the U.S. Customs Service, less than 10 percent of truck entries on the southern border are BRASS, compared to 60 percent on the northern border. Special BRASS lanes have been informally designated upstream of some U.S. ports of entry to expedite these movements, but it is still common for certified shipments to be forced behind non-certified and low-priority traffic on access roads and in border queues. This problem, combined with the lengthy BRASS certification process, outweigh the benefits of participation in pre-clearance initiatives for some firms.

Acknowledging private-sector demands for increased program incentives, the U.S. government recently merged C-TPAT into a new program, FAST (Free and Secure Trade program), at the U.S.-Canada border. This program addresses private-sector demands for increased incentives by incorporating features such as exclusive truck lanes for program participants and barcoded ID cards for use by truck drivers.

Alternative

Organize comprehensive incentive programs that provide tangible benefits to participants, such as queue bypass or expedited processing, thus increasing the efficiency and security of the border-crossing process. The requirements of incentive programs should not be so financially or logistically onerous that they preclude participation by most candidates. Initiatives must be marketed aggressively by public agencies and supported with sufficient resources to ensure that program objectives (including reasonable application processing times) are achievable.
Creation of a lead agency at U.S. ports of entry would facilitate coordination among the various stakeholders involved in the development and launch of improvement initiatives. In the absence of a single lead border agency, a binational, multi-agency planning structure would help. Such a structure would foster the development of comprehensive and worthwhile border initiatives as opposed to many overlapping programs.

Future Needs

First, the potential for reducing traffic congestion at the border through higher private-sector participation in incentive programs is significant. Further research could identify new options for inducing private sector enrollment in these programs and to develop improved strategies and action plans to achieve this goal.

Second, research to determine whether the remote border clearance and “fast-lane” initiatives being tested at the U.S.-Canada border could be implemented between the United States and Mexico and would provide a basis for creating a more efficient and secure incentive program on the southern border. Given the emphasis on drug interdiction and other conditions at the southern border, development of a fast-lane program may incorporate unique features.

C-2. Lack of Data Collection and Benchmarks

Description of Issue/Problem

One of the principal shortcomings of port of entry planning is the absence of comprehensive traffic data and port performance monitoring. Data deficiencies prevent operators, users, and oversight agencies from understanding whether a given port of entry is functioning effectively and efficiently. Likewise, the absence of benchmarks prevents the development of coordinated inter-agency strategies to improve border-crossing systems.

Numerous data collection efforts provide a better understanding of truck-borne trade between the United States and Mexico. These efforts focus on a variety of system characteristics including traffic patterns, arrival rates, truck types (loaded vs. empty/bobtail), processing rates, and delay times.

Manual data collection methods have limited many of these studies to snapshots of select high-volume crossings. Because data collection efforts normally last only a few days, the reliability of data is sometimes questionable. The temporary presence of researchers at border-
crossing facilities may encourage border agencies to process traffic more expeditiously than would otherwise be the case.

Some information on binational truck flows is automatically collected by bridge operators, public agencies, and private-sector entities through the scanning of documentation and other means. However, this information is often not compiled, shared, or made available to the public. There is currently no single, comprehensive source of data on trans-border truck movements.

A consequence of the scarce availability of detailed, reliable data is the lack of performance benchmarks. Problem identification in local crossing systems is sometimes based on subjective analysis. U.S. port directors report that the methodology for calculating pre-primary wait times includes conversations with drivers and “eyeballing” the length of the truck queue. Sources in the drayage industry dispute the pre-primary wait times published on the U.S. Customs website, claiming that actual delays are often much longer.

The underlying causes of border problems and their magnitude relative to other problems experienced locally or border-wide may remain undetermined due to data and benchmarking shortfalls.

Alternative

Coordinate public agency technology and resources in Mexico and the United States to gather, compile, and disseminate data on traffic characteristics and delay times. Develop a single source for binational border planning data that can be utilized to establish where and why border crossing problems exist, what their relative magnitudes are, and what remedial policies can be introduced to mitigate them.

C-3. Inconsistent Planning for Truck Safety Inspection Facilities

Description of Issue/Problem

The 1993 North American Free Trade Agreement (NAFTA) required the United States to allow Mexican trucks entry for deliveries and return loads, first in border states by 1995, and then open entry into the United States by January 1, 2000.2 Former President Clinton, sighting safety concerns, imposed a moratorium on Mexican trucks beginning December 1995. But a NAFTA arbitration panel ruling in 2001 said the U.S. moratorium violated the treaty, and
President Bush said he would open the border. Before Mexican trucks can cross into the U.S., the U.S. Department of Transportation must satisfy that it is now safe for them and that all safety procedures are in place. The Federal Motor Carrier Safety Administration (FMCSA) reported that by June 30, 2002, inspection facilities should meet new federal requirements at 23 of the 25 southern border crossings. In a written comment on a recent Inspector General’s report on the safety issue, the Secretary of Transportation, Norman Mineta, said that he fully expected that the U.S. would be in a position to certify opening of the border by the summer of 2002.

Various strategies to maintain truck safety have been proposed at the southern border. The overall commercial vehicle safety improvement initiative at the border entailed the hiring and training of 214 new inspectors and the construction or improvement of physical truck inspection infrastructure. In Texas, eight truck inspection stations have been (or are scheduled to be) constructed as close to the POE facilities as possible. When these are operational, activities within the federal compound by the FMCSA staff will cease. Other border states have developed different systems to raise the level of truck inspections at the border and ensure the safety of Mexican trucks entering the U.S.

TransAnalysis, an engineering and planning company in Texas, has undertaken a simulation of the safety inspection facilities at a number of sites. The output of the simulation model includes system impacts within the locale, the need for new traffic signals, modifying signal coordination, evaluating geometry, and other related highway impacts. However, the model does not address either the costs or benefits of cooperation between those responsible for the safety inspection facilities and related entities such as GSA, USCS, and the local city planning entities. Planning and construction of U.S. state vehicle inspection facilities at the border is being undertaken on a state-by-state basis with little stakeholder coordination or system integration within transportation corridors.

The absence of a consistent and far-reaching inspection facility development and implementation plan has led each state to determine its own direction and stakeholders to plan in isolation.

*Alternative*

Symmetry among truck safety inspection facilities is necessary to ensure that commercial vehicles entering the United States are treated equally regardless of the gateway through which they enter.
they pass. A standardized facility planning process would determine the location and operations of permanent safety inspection sites along the border and promote greater coordination with respect to the integration of those facilities into border-crossing and international trade corridor systems.

There are clear benefits from enhanced stakeholder cooperation and coordination in the construction and operation of border safety inspection facilities on the U.S.-Mexico border. First, truck records can be linked to USCS activities so that each may be aware of the other, particularly when trucks first enter the USCS facilities. Developing the records within the safety inspection facilities can lead to the creation of trip records, which can be accessed after the vehicle has left the facilities. This may assist police and safety inspection officers throughout the border state and corridor states through which the truck is traveling. Finally, there is an opportunity for these records to be linked to the commercial vehicle operations (CVO) schemes that are currently being developed by U.S. federal authorities along key trade corridors. By credentialing these vehicles, it will be possible to hold a record for the entire length of the trip and provide benefits for both the users and those enforcing truck safety laws.

DEMAND MANAGEMENT

C-4. Lack of Fee-Based Priority Shipment Lane

Description of Issue/Problem

Time-sensitive shipments are mingled with other traffic types creating a “one-size-fits-all” border-crossing structure. High-priority, low-risk cargo that is handled by certified carriers may be delayed in border queues behind empties and low-priority shipments due to the lack of expedited crossing alternatives. At some gateways, the organization of infrastructure and processing systems tends to spread delay evenly among vehicles regardless of whether they are carrying urgent shipments or low-value, non-time-sensitive freight. The ability of border infrastructure and processes to account for heterogeneous truck flows with varying needs is an important aspect of a coordinated crossing system.
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Alternative

Resolution of one-size-fits-all traffic problems through implementation of a fee-based priority shipment lane is referred to as “value pricing.” Value pricing differs from congestion pricing in that drivers have the option to choose between regular facilities (lanes or roads) and facilities that provide a premium level of service for an extra payment. Unlike congestion pricing, value pricing does not seek to encourage the off-peak movement; rather, it provides an opportunity for priority shipments to circumvent peak-period congestion prior to inspection for a fee that reflects the value of the premium service.

Although value pricing is usually proposed in connection with the construction of new infrastructure (lanes, etc.), the main economic rationale is its potential to improve the utilization of infrastructure. Value pricing, therefore, takes infrastructure as given so that its adoption entails the tolling of an existing facility that would otherwise be unpriced. From this perspective, dedicating a lane for value pricing means one less lane for regular use. The benefit of value pricing arises not from a reduction in overall delay but from a more efficient distribution of the burden of delay, shifting it from relatively time-sensitive traffic to traffic that can bear delay at lower cost. The more time-sensitive traffic opts for the fast lane and experience shorter delays than it would in the absence of value pricing, while traffic that sticks with the untolled lanes experiences longer delays.

R-2. Lack of Congestion Pricing

Description of Issue/Problem

Lack of congestion pricing may indirectly contribute to congestion and delays during peak border-crossing periods. As discussed in C-13, a significant coordination problem at the border is the lack of complementary stakeholder schedules. For example, schedules in the trading community may not match the schedules and processing capacity of the POE inspection agencies. The typical consequence is a peak in the demand across the day, usually in the afternoons. The processing capacities of the border inspection agencies are relatively stable because of constraints on infrastructure and staffing. As a result, the processing capacity at many POEs is not able to accommodate the daily peaks in demand and queues form.
Alternative

Collect additional data on traffic and delays to identify when and how predictably peaks occur. Authorize an increase in fees during peak periods to mitigate demand with a fee increase justified on the basis of additional resources necessary to accommodate peak demand. Investigate likely demand responses to peak-period tolls and, where warranted, perform cost-benefit analysis of congestion pricing scenarios.

Congestion pricing is a potentially valuable tool to manage demand and improve productivity and efficiency in the commercial border-crossing process. Stakeholders that are currently able to disregard costs they impose on others by crossing during peak periods, such as congestion and subsequently higher levels of environmental pollution, would be forced to internalize these costs. This, in turn, may bring about positive changes in stakeholder procedures and scheduling. Stakeholders that cross during congested afternoon periods may be enticed to reorganize their activities to take advantage of cheaper, off-peak periods during the morning. Drayage firms and independent drivers that frequently cross empty or without a trailer, a common practice in unidirectional, multi-shipment drayage contracts, will be encouraged to expend greater effort in securing backhauls. This will enhance border system productivity and efficiency. At border crossings that exhibit particularly consistent hourly traffic patterns and delay times, charges could be varied according to the level of congestion at a given time of day. Revenue from congestion pricing could be allocated to initiatives aimed at further reducing border congestion and delay.

Future Needs

To devise and evaluate a regime of congestion pricing would call for more data. A clear and complete picture on when delays occur, their length, and additional data on the predictability of peaks would be necessary to undertake a congestion pricing feasibility analysis. Information on the likely demand responses to peak-period tolls would also aid in the development of appropriate congestion pricing alternatives at U.S.-Mexico commercial truck crossings.
C-5. Commingling of Commercial Traffic Types

Description of Issue/Problem

Lack of commercial vehicle segregation by risk level, type, or time sensitivity exacerbates traffic conflicts prior to the U.S. primary inspection station. Trucks carrying time-sensitive BRASS, maquiladora, or perishable freight may be funneled into the same queues as trucks hauling traditional dry freight or empties/bobtails. The mixing of commercial traffic types with different risk characteristics, priority levels, and processing requirements is undesirable because it slows the movement of priority trade and reduces the benefits of expedited crossing programs for certified low-risk shippers and carriers.

At some ports of entry, the movement of laden vehicles is being choked off by non-revenue movements. Nearly half of all northbound trucks crossing the Mexico-U.S. border currently move empty or without a trailer (Table D-1).

At Otay Mesa, the Laredo World Trade Bridge, and other ports of entry that process large volumes of truck traffic, authorities have tried to informally dedicate access lanes to specific truck types such as BRASS, empties, or traditional trade. The segregation of truck traffic into homogeneous groups reduces vehicle conflicts, facilitates Customs processing, and speeds the crossing process for low-risk, priority shipments. However, many of these arrangements have not achieved their full potential on account of insufficient traffic monitoring and enforcement of truck segregation. Drivers seeking the quickest route across the border frequently enter the shortest queue regardless of whether they are entitled to be in that lane or not. Other drivers create traffic jams by using clear lanes to bypass traffic, cutting into the correct lane immediately prior to the Primary Inspection Module. Truck drivers working for the same firm allow this practice to continue.

Alternative

Segregate pre-cleared vehicles from traditional trade and empties/bobtails. Monitor and enforce traffic-type segregation. Implement latest pre-primary ITS technologies in combination with driver, vehicle, and shipper databases to aid identification of high-risk movements and expedite processing of low-risk movements. If space constraints limit the use of physical barriers to segregate traffic, compliance with informal lane designation schemes should be
### Table D-1. Percent of Northbound Truck Crossings at U.S.-Mexico Border that Were Loaded, Fiscal Year 2001.

<table>
<thead>
<tr>
<th>Port of Entry</th>
<th>Loaded Truck Crossings</th>
<th>Total Truck Crossings*</th>
<th>Percent of Crossings Loaded</th>
</tr>
</thead>
<tbody>
<tr>
<td>Port of Laredo, TX¹</td>
<td>769,237</td>
<td>1,419,165</td>
<td>54%</td>
</tr>
<tr>
<td>Port of Otay Mesa, CA</td>
<td>368,428</td>
<td>700,453</td>
<td>53%</td>
</tr>
<tr>
<td>Port of El Paso, TX²</td>
<td>366,677</td>
<td>656,257</td>
<td>56%</td>
</tr>
<tr>
<td>Port of Hidalgo/Pharr, TX³</td>
<td>227,749</td>
<td>367,991</td>
<td>62%</td>
</tr>
<tr>
<td>Port of Calexico East, CA</td>
<td>113,837</td>
<td>259,174</td>
<td>44%</td>
</tr>
<tr>
<td>Port of Brownsville, TX</td>
<td>122,223</td>
<td>255,231</td>
<td>48%</td>
</tr>
<tr>
<td>Port of Nogales, AZ</td>
<td>189,438</td>
<td>251,474</td>
<td>75%</td>
</tr>
<tr>
<td>Port of Eagle Pass, TX</td>
<td>55,567</td>
<td>100,983</td>
<td>55%</td>
</tr>
<tr>
<td>Port of Tecate, CA</td>
<td>31,395</td>
<td>62,243</td>
<td>50%</td>
</tr>
<tr>
<td>Port of Del Rio, TX</td>
<td>39,648</td>
<td>59,286</td>
<td>67%</td>
</tr>
<tr>
<td>Port of San Luis, AZ</td>
<td>21,503</td>
<td>39,908</td>
<td>54%</td>
</tr>
<tr>
<td>Port of Douglas, AZ</td>
<td>17,365</td>
<td>34,054</td>
<td>51%</td>
</tr>
<tr>
<td>Port of Santa Teresa, NM</td>
<td>18,310</td>
<td>30,612</td>
<td>60%</td>
</tr>
<tr>
<td>Port of Rio Grande City, TX</td>
<td>19,037</td>
<td>26,391</td>
<td>72%</td>
</tr>
<tr>
<td>Port of Calexico, CA</td>
<td>4,765</td>
<td>Not Available</td>
<td>Not Available</td>
</tr>
<tr>
<td>Port of Progreso, TX</td>
<td>3,644</td>
<td>16,649</td>
<td>22%</td>
</tr>
<tr>
<td>Port of Roma, TX</td>
<td>6,718</td>
<td>12,141</td>
<td>55%</td>
</tr>
<tr>
<td>Port of Naco, AZ</td>
<td>6,304</td>
<td>9,976</td>
<td>63%</td>
</tr>
<tr>
<td>Port of Presidio, TX</td>
<td>4,526</td>
<td>7,562</td>
<td>60%</td>
</tr>
<tr>
<td>Port of Lukeville, AZ</td>
<td>Not Available</td>
<td>4,271</td>
<td>Not Available</td>
</tr>
<tr>
<td>Port of Columbus, NM</td>
<td>2,995</td>
<td>4,239</td>
<td>71%</td>
</tr>
<tr>
<td>Port of Sasabe, AZ</td>
<td>1,110</td>
<td>2,215</td>
<td>50%</td>
</tr>
<tr>
<td>Port of Andrade, CA</td>
<td>1,127</td>
<td>1,727</td>
<td>65%</td>
</tr>
<tr>
<td>Port of Fabens, TX**</td>
<td>Not Available</td>
<td>147</td>
<td>Not Available</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2,391,603</strong></td>
<td><strong>4,322,149</strong></td>
<td><strong>55%</strong></td>
</tr>
</tbody>
</table>

* Loaded and empty/bobtail trucks
¹ Includes Laredo World Trade Bridge and Colombia Solidarity Bridge
² Includes Bridge of the Americas and Ysleta-Zaragoza Bridge
³ Includes Veterans International Bridge and Los Indios Bridge
** Light trucks only - not a full-service commercial crossing

Source: U.S. Customs Service

Closely monitored and enforced by authorities. This will prevent inspection delays that apply to certain traffic types from adversely affecting entire commercial flows at the border. Where practicable, bypass lanes through/around ports of entry should be provided for trucks not selected for detailed inspections.
Future Needs

In order to determine the full magnitude of the empty/bobtail problem at the U.S.-Mexico border, detailed data on southbound loaded and empty movements must also be captured. Unfortunately, the Mexican agencies that might collect such data (Customs - SHCP, the Federal Road and Bridge Authority – CAPUFE, and the National Institute of Statistics, Geography and Informatics – INEGI) do not archive this information or are unwilling to share it with the public. An effort to combine data collected by Mexican public agencies and private border bridge and roadway operating authorities should be undertaken. This will enable a much clearer understanding of traffic mixing problems and potential solutions.

PHYSICAL LAYOUT AND TRUCK MOVEMENT

C-6. POE Configuration – New Inspection Technologies Cannot be Accommodated

Description of Problem or Issue

Most border stations were built to accomplish specific missions and lack flexibility and adaptability. New technologies and procedures have changed the way inspections are performed. For instance, the advent NII technology has rendered a significant portion of the loading dock capacity at some U.S. land ports obsolete. Traditional layouts cannot provide the space and symmetry needed for new inspection technologies because there is not enough land to accommodate efficient linear processes.

Alternative

Assess operational value of current POE design and evaluate options for retrofitting and reconfiguring facilities to accommodate changes in technological capabilities, POE demands, and updated processing techniques. Discontinue initiatives, such as the construction of additional secondary dock space, if more efficient non-intrusive inspection options exist. Continue to acquire land adjacent to extra-urban POE facilities to ensure future space availability for port development and expansion.
R-3. POE Configuration – Outdated Facility Layouts

Description of Problem or Issue

The layouts of border stations have evolved over the life of the facility, reflecting changing missions and practices. Most ports of entry are inefficiently configured for optimum throughput, safety, and security. Squeezing more activities into the limited confines of some land ports on the U.S.-Mexico border has resulted in the creation of a hazardous environment for inspection personnel. Tijuana-Otay Mesa is an example of a border-crossing system with lane configurations that do not provide sufficient room for inspectors to move safely around the vehicles to perform pre-primary inspections. Other ports of entry lack isolated and properly equipped areas to conduct hazardous materials inspections.

Alternative

Restructure POE layouts to provide the flexibility necessary to properly accommodate manual inspection activities and Customs processes. Widen POE access lanes and provide adequate, isolated hazardous materials inspection sites at designated ports of entry. Include all U.S. and Mexican public-sector agencies in the planning and design of future border crossings.

C-7. POE Configuration – Poor Internal POE Circulation

Description of Issue/Problem

The combination of current processes and layouts produce internal POE circulation problems that include traffic conflicts between cleared and uncleared trucks. Some of these problems have arisen due to a larger number of vehicles being inspected at secondary stations than was previously possible. High-volume secondary inspection stations situated close together have generated considerable traffic flow problems within ports of entry.

Security concerns have also arisen due to inadequate regulation of cleared and uncleared traffic circulation within U.S. ports of entry. Anecdotal reports of forged inspector signatures and the illegal exchange of documentation between cleared and uncleared vehicles at secondary inspection waiting areas underscores the need for improved, more tightly regulated POE traffic circulation schemes.
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Alternative

Redesign POE circulation to prevent uncleared trucks from exiting POEs unlawfully, and reduce traffic conflicts between cleared vehicles and those awaiting inspection.

R-4. Capacity – Number of Primary Inspection Booths

Description of Issue/Problem

Some POEs lack a sufficient number of primary inspection booths due to severe space constraints. The Nogales, Arizona, port of entry is an example of a facility that has insufficient physical capacity to handle daily traffic volumes. Operation of all primary booths cannot efficiently accommodate demand at this port throughout most of the day. Demand for additional primary inspection booths could also increase sharply at El Paso if plans to close the El Paso-BOTA facility to laden truck traffic are implemented.

Alternative

Explore opportunities to expand the number of primary inspection booths where required/feasible. Improvements to port layouts, operations and vehicle tracking, and changes in peak arrival characteristics through improved incentive planning may provide some relief to capacity constraints. In some cases, acquiring land to expand the number of primary booths may be the only option.

C-8. Capacity – Inspection Sequencing

Description of Issue/Problem

There are untapped opportunities for border agencies to inspect vehicles while they are in the queue for U.S. primary inspection. Peak-period truck queues at U.S. Primary Inspection Modules are nearly ubiquitous at major commercial ports of entry along the southern border. Normally, the arrival rate of northbound trucks at the border steadily increases throughout the morning. As vehicles exit the Mexican Export Compound, they proceed onto the border roadway or bridge. The U.S. primary inspection station is typically the greatest constraint in the crossing system. Consequently, this is one of the first areas at which queues and congestion form. Depending on the gateway and the time of crossing, queues may be encountered
immediately after the Mexican export facility or as the truck approaches the U.S. primary inspection area. The time spent by vehicles waiting in lines upstream of U.S. primary inspection stations represents one of the largest segments of unproductive “dead time” in the U.S.-Mexico border-crossing system.

**Alternative**

Various inspection activities typically carried out within the port of entry could be conducted in advance of the Primary Inspection Module where traffic and conditions permit. Assess the potential to reduce idle wait time, alleviate congestion, and improve security in the border crossing process through the transfer of canine drug inspections, driver interviews, vehicle revisions, document reviews, and weigh-in-motion screening activities to pre-primary vehicle queuing areas. Enable these activities to be collapsed when congestion and queue length are insufficient to justify them.

**C-9. Capacity – Uncoordinated Access Road Design and Limited Number of Lanes**

**Description of Problem/Issue**

Uncoordinated access road design and a limited number of lanes cause cross-border traffic to interfere with local vehicular movement on roads near border crossings. Urban and geographical features confine the number of access lanes leading to Nogales, El Paso-BOTA, and other U.S. ports of entry. In the border cities of Tijuana, Ciudad Juárez, and Reynosa, access roads to Mexican export facilities have been enveloped by urban sprawl. The length and width of these roadways are insufficient to handle present volumes of peak-period truck traffic. Access bottlenecks in Mexico commonly produce truck queues that back up onto adjacent roadways, disrupting traffic circulation in surrounding communities.

Although a new highway leading to the Colombia-Laredo border crossing is now complete, dangerous road conditions deterred carriers from utilizing that uncongested crossing for years. Similarly, the absence of a northern paved access route along the border from Ciudad Juárez to the San Jerónimo-Santa Teresa border crossing has impeded a redistribution of truck traffic from the congested BOTA and Ysleta facilities to that gateway.

The length and width of the actual crossing infrastructure connecting Mexican and U.S. commercial compounds is another access consideration affecting border capacity. Delays at the
U.S. Primary Inspection Module occasionally produce queues that extend into Mexico. Where insufficient queuing capacity exists, congestion clogs the Mexican export facility. These problems are compounded by incongruent U.S. and Mexican border facility layouts that require large commercial vehicles to negotiate tight turns and steep grades.

**Alternative**

The extent to which access road design and capacity disrupt cross-border trade flows depends on a combination of factors including the location of the crossing, the volume of truck traffic, and the capacity of other components in the system. Opportunities exist to better coordinate access road and port designs binationally and within each nation. Use the Metropolitan Planning Organization (MPO) planning processes to integrate border station and city planning needs.

**C-10. Lack of ITS Solutions to Streamline Truck Movements**

**Description of Issue/Problem**

Existing processes at the border are time consuming, resource intensive, and contribute to redundant information verification. The prevailing crossing process at most commercial gateways between the United States and Mexico requires a truck to stop several times within and around border compounds. Delays are imposed for toll collection, Customs risk assessment, inspections, document verification, vehicle weight checks, and other reasons. The manual processes used to carry out these tasks are time consuming and resource intensive.

Currently, trucks cross the border and normally stop behind other vehicles waiting to be examined at the U.S. Primary Inspection Module. As vehicles are processed at primary inspection (usually a 1-2 minute procedure), the queue slowly advances, creating stop-start engine cycles. If cleared at primary, the truck makes its way through the port of entry, stopping again at the exit booth to ensure that all paperwork has been checked and the vehicle is cleared to proceed into the United States.

If a vehicle is sent to secondary, it may be required to stop a number of times (for canine drug screening, a gamma ray or X-ray scan, vehicle safety inspection, HazMat inspection, or manual cargo or conveyance inspection at a loading dock). These steps are sequential in that a vehicle can be cleared at any time and as it moves through the process. The time taken at each
step becomes successively longer, culminating with a dock inspection if necessary. In an extreme case, it may take several hours for a vehicle to be thoroughly checked and processed through the U.S. port of entry.

New U.S. DOT regulations now require that vehicle safety inspections be undertaken near the border. The U.S. congress has passed legislation mandating that all trucks entering the United States meet state and federal laws, and those whose trips are beyond the traditional commercial zone receive even greater scrutiny. However, once familiarization with Mexican companies and vehicles grows, vehicle safety inspections should fall to meet those rates for all state vehicles. Not to do this would be to follow a profiling policy, which is prohibited under NAFTA.

**Alternative**

Develop ITS capabilities at the border that are interconnected with Commercial Vehicle Operations (CVO) improvements and technology initiatives along transportation corridors. ITS systems that minimize delays for safe, legitimate trade should incorporate the electronic transmission of pre-qualified information on the driver, tractor, trailer, and cargo. Existing Dedicated Short-Range Communication (DSRC) technology can be employed to transmit this information as the vehicle approaches the border crossing, allowing sufficient time for public agencies to determine which, if any, inspections are required. ITS technologies, such as automated toll collection, variable messaging signs, and weigh-in-motion scales, are additional traffic management instruments that can be leveraged to streamline and expedite the border-crossing process for legitimate trade.

The benefits to be gained from reducing multiple stops are three-fold. First, fuel consumption will improve, which will lower vehicle operating costs for truckers. Second, transit times through the facilities would be improved, and this would impact both truck productivity and possibly improve supply chain efficiency at the border. This may have associated benefits in terms of production processes, just in time deliveries, and the necessity to store or hold material in border warehouses. Finally, reducing speed cycle changes at low-level engine revolutions will improve emissions and promote a healthier environment for personnel working in the facilities. As noted, further stops maybe necessary at vehicle inspection stations adjacent to ports of entry.
Work to incorporate vehicle/trade links in ACE so that DPS data at vehicle safety inspection stations can be developed as part of the new POE systems. Coordination with the FHWA and U.S. State DOTs along NAFTA transportation corridors should be undertaken to develop a credentialing system that spans the entire supply chain.

In principle, inspection efficiency should remain the aim of all future border crossings, and coordination should be structured to ensure that all inspection duties can be carried out within expedited crossing systems. In reality, some interim steps will need to be implemented at border ports of entry to move from the current system to a one- or no-stop system.

**STAFF MANAGEMENT**

**C-11. Personnel Turnover – USCS Inspector Attrition Rates Are High**

*Description of Issue/Problem*

In the United States, voluntary attrition among public sector employees has created human resource challenges for agencies such as U.S. Customs. Customs inspectors are reportedly recruited from offices around the country to work at the southern border. Senior officials report that many new inspectors are unprepared to work the long hours and overtime that are, today, common among Customs employees. Inspectors who are trained to work as U.S. Customs agents quickly move on to more lucrative jobs within the agency or elsewhere in government. Openings created as a result of new government initiatives, such as the FAA’s “Sky Marshall” program, have drawn recently recruited agents away from the U.S. Customs Service.

The extreme heat, vehicle exhaust, and difficult working conditions prevalent at the U.S-Mexico border are additional factors cited as contributors to inspector burn out. High rates of turnover among agents at the USCS compromise agency resources, staff training levels, and overall border planning and operations.

*Alternative*

Establish a long-term plan to equalize agency compensation and reduce attrition rates due to unprepared trainees.
R-5. Insufficient Levels of Customs Personnel

*Description of Issue/Problem*

U.S. Customs staffing levels are often too low to take full advantage of available NII technology. The two most common NII technologies currently employed on the southern border are the gamma ray VACIS and the truck X-ray. NII equipment scans the contents of tractors and trailers, reducing the need for time-consuming and expensive manual inspections. In the past, the National Guard has helped eased the staffing burden of operating NII equipment, but this was never envisioned as a permanent solution. Some U.S. port directors have indicated that they occasionally have to shut down NII equipment on account of not having sufficient staff to operate it. In other cases, trucks must wait in long queues at NII stations or undergo alternate inspections that may be more time consuming.

*Alternative*

NII-related deficiencies should be addressed through the provision of specific funding for NII technology and equipment operators in coordinated equipment/personnel implementation plans. Such plans will require a reassessment of investment strategies and infrastructure designs at U.S. ports of entry to ensure optimization of inspection resources. Greater reliance on NII technologies in concert with the deployment of advanced information systems will result in reduced congestion and delay at U.S. ports of entry, lower levels of contraband smuggling on commercial conveyances, and enhanced inspection efficiency, capacity, and interdiction capability. In cases where physical space limitations constrain the ability to add needed NII equipment, POE retrofitting and reconfiguration should be considered.

C-12. No Mechanism to Predict and Prevent Queue Development

*Description of Issue/Problem*

Primary inspection capacity is partially determined by the availability of personnel to perform required inspection activities. Fixed primary inspection staffing schedules prevent the opening of additional primary booths as soon as demand warrants. In some cases, a sufficient number of primary inspection booths exist, but staffing is not sufficiently responsive to preclude queue development. At large ports of entry, primary staffing levels are normally tiered.
according to demand. For example, a third of the available primary gates may be open during the early morning hours, approximately two-thirds of the booths are staffed throughout the mid morning, and all booths are generally operated during the peak period from around noon until the evening hours.

However, regimented staffing schemes are unable to respond promptly to variable traffic demands. Afternoon Customs shift changes are particularly problematic because they can result in vehicles remaining unattended within the port of entry for half an hour or longer. In other instances, pre-primary queues have been observed to build to dozens of vehicles before additional inspectors are assigned to primary inspection. The lack of flexibility and responsiveness on behalf of Customs in opening primary inspection booths and rapidly and seamlessly executing shift changes contributes to delays for northbound commercial vehicles. High truck arrival rates overwhelm constant (or temporarily reduced) port capacity and promote the formation of queues that often take significant periods of time to dissolve after additional personnel have been added.

Alternative

Improving the responsiveness of primary booth staffing schemes and reducing processing times during shift changes are two alternatives for increasing capacity and lessening delays in the border-crossing process. Implement an arrival-rate monitoring device upstream of primary inspection to provide port authorities with advanced information on impending queue development. This technology, coupled with enhanced Customs staffing flexibility and responsiveness, would enable port managers to make informed, real-time personnel decisions to speed the crossing process.

Future Needs

In order to determine the extent of staffing responsiveness problems at U.S. POEs, on-site observation or detailed POE operations records and traffic data are required. Information currently available on primary inspection wait times and staffing schedules is subjective, and comprised of daily AM and PM snapshots of delay times rather than the continuums that are necessary for meaningful analysis. Development of a standardized wait-time monitoring system at southern border crossings would facilitate and improve collection of this data. Maintenance of
U.S. Customs staffing records is also required to determine the level of congestion generated by sub-optimal staffing transitions.

**R-6. Personnel Turnover – Mexican Customs’ Rotation of Port Directors**

*Description of Issue/Problem*

There are frequent personnel changes within public agencies at the U.S.-Mexico border. This disrupts domestic and binational planning, operations, and coordination initiatives. The continual replacement of Mexican port directors is a major component of this problem. Many port directors have been fired or transferred after less than one year on the job. This practice is likely associated with the Mexican federal government’s new anti-corruption initiative championed by President Fox. In 2001, 44 of 47 Mexican Customs directors were dismissed along with 43 mid-level Customs officials and all 50 leaders of the Customs Police Force.7

U.S. port directors have indicated that the constant adjustment to new port management in Mexico is complicated by changing rules and regulations. Occasionally, new rules contradict effective agreements and procedures that were developed over long periods and through extensive consultation with previous administrators. Examples of such disruptions include the discontinuation of extended evening hours at Mexican and U.S. ports of entry, coordination problems regarding Mexican and U.S. holiday schedules, and reduced or cancelled binational port initiatives.

*Alternative*

Establish a binational public-agency communication accord to minimize conflicts caused by changes in Mexican Customs personnel.

**STAKEHOLDER COORDINATION**

**C-13. Poorly Coordinated Stakeholder Schedules**

*Description of Issue/Problem*

The differing schedules of public- and private-sector stakeholders in the border-crossing process partially dictate daily commercial traffic patterns at U.S.-Mexico border
crossings. The differing operational schedules of individual stakeholders and the time requirements for completion of their activities result in a crossing window that is substantially narrower than the daily hours of service offered at border facilities. This is especially true at busy commercial crossings where delays due to congestion can be lengthy or difficult to predict. Loaded truck movements from Mexico to the United States are generally concentrated between midday and the late afternoon-early evening hours. Daily traffic peaks frequently result in the complete saturation of border facilities during these periods and the availability of excess capacity at other times. This demand pattern is a major contributor to congestion at many ports of entry along the U.S. southern border.

By virtue of their role as an information conduit between Customs and the private sector, customs brokers exercise a large degree of control over the timing of trans-border movements. The broker industry has been criticized for contributing to peak-period congestion at the U.S.-Mexico border by not beginning the documentation preparation and transmission process earlier in the morning and, thereby, removing some of the peak-period strain on public resources. The broker community contends that the specific drayage information they require for completion of their responsibilities is not available until the shipment is ready to cross the border and that broker cycle times are generally too short to justify pre-preparation of documentation.

The USDA’s schedule for grading northbound produce at the port of Nogales, Arizona, is an example of a public-sector scheduling practice that contributes to a demand-capacity mismatch at the border. Agricultural shipments that require grading to be sold on the U.S. market are sent to special Mexican border facilities where they are assessed and certified by USDA graders prior to importation into the United States. Although the Nogales port of entry opens to commercial traffic at 7 a.m., USDA employees do not typically reach the Mexican grading facilities and begin grading activities until 9 a.m.. As a result, many shipments are prevented from crossing the border during early off-peak hours. By the time agricultural loads have been graded and cleared, delays at the U.S. Primary Inspection Module are often excessive. FDA staffing shortages at ports of entry along the southern border are also reported to significantly constrain crossing windows for shipments governed by that agency.

Shippers are the initiators of cross-border movements. Their schedules play an important role in determining when a load crosses the border. This is especially true in the case of border zone maquiladoras operating just-in-time inventory systems. Maquiladora factories in Ciudad
Juárez, Coahuila, and Tijuana, account for a sizeable portion of northbound movements through commercial gateways in these regions. Maquiladora plants normally load directly onto the truck to maintain low, inventory carrying costs. Production runs initiated early in the day may not turn out a finished product until midmorning. Additional delays associated with loading the trailer and documenting the shipment prevent many northbound loads from crossing the border until after 10 a.m. Uncoordinated stakeholder schedules produce a peak demand trend that is clearly visible in a random five-day sampling of laden truck movements through the Otay Mesa port of entry (Figure D-1). By not coordinating their activities, stakeholders in consecutive segments of the system squander excess morning and late evening border capacity and aggravate peak-period congestion.

![Figure D-1. Hourly Arrival of Laden Trucks at the Otay Mesa POE (02/11/02-02/15/02)](image)

Source: Otay Mesa Port of Entry

**Alternative**

Organize public- and private-sector consultation to facilitate identification of scheduling problems and enable adjustments that smooth POE demand and reduced border congestion and delay. More broadly distributed demand for port of entry services could be achieved if USDA graders and customs brokers began their work earlier in the day and shippers coordinated their
production and shipping schedules to take advantage of off-peak periods. Increased FDA funding would enable that agency to bring its inspection schedules in line with those of other agencies at major ports of entry.

C-14. Inadequate Informal Stakeholder Coordination

Description of Issue/Problem

Stakeholder practices are often carried out in isolation without regard to their impacts on system efficiency. The physical movement of goods across the U.S.-Mexico border is contingent upon the timely and accurate transmission of information. Shipment data is exchanged among private-sector supply chain partners via fax, email, Electronic Data Interchange (EDI), or other means. Typically, the Mexican exporter communicates cargo information to one or two parties (i.e., U.S. consignee, Mexican customs broker, or U.S. customs broker) that subsequently distribute it among other stakeholders on a need-to-know basis. Some shippers rely on a customs broker in one country to arrange broker services in the other. If these arrangements are not made in advance and clearly communicated to the appropriate parties, delays will result. Another common source of disruptions in U.S.-Mexico supply chains is the transmission of incomplete or inaccurate information by the shipper. If the customs broker does not receive the proper information before the shipment arrives at the border, scheduled crossings may have to be pushed back.

Most delays due to poor private-sector coordination occur with infrequent shippers who lack established relationships with their Mexican or U.S. customs brokers. These exporters may be unfamiliar with the crossing process and transmit information that is incomplete, incorrect, or late. In rare cases, documentation errors are not discovered until the shipment reaches the U.S. port of entry, at which time correction can be costly and potentially result in the impoundment or confiscation of the conveyance and merchandise.

Broker delays may be the result of slow cycle times or infrequent document delivery to the border. Two key documents prepared by customs brokers are the Mexican Export Pedimento and U.S. Inward Cargo Manifest. A driver and shipment may be forced to wait at the border if this paperwork is not quickly processed and delivered. Some brokers indirectly contribute to border delays by not providing precise instructions or educating their clients with respect to required documentation.
Poor broker-carrier coordination is another potential impediment to crossing efficiency. Transfer of a trailer from a long-haul trucking firm to a drayage carrier (and vice versa) may entail a short or long delay, depending on the degree of communication and coordination that exists between these stakeholders. If the long-haul carrier does not expeditiously inform the broker of a shipment’s arrival at the border, the load may be forced to cross the border during the most congested period. Similarly, the agility of the drayage carrier in responding to service requests by brokers and long-haul firms is an important factor in the timing and speed of the crossing process.

Poor communication between the public- and private-sector stakeholders precludes border efficiency in some instances. Shippers using gateways where traffic volumes vary on a daily basis complain that there is no accurate source of real-time information on the length of truck queues at U.S. primary inspection. Such information could be used by the private sector to better match shipping schedules with available capacity at the port of entry.

**Alternative**

Establish a forum for definition and resolution of stakeholder coordination problems. Provide Web broadcasting of monthly U.S. customs broker community meetings to facilitate dissemination of port operations information among all interest groups. Provide Web broadcasting of truck queue lengths to facilitate off-peak scheduling for discretionary shippers.

The expansion of port meetings to all stakeholders in the supply chain would increase awareness and accountability in the border-crossing process and facilitate resolution of problems resulting from the lack of informal stakeholder coordination. Port meetings address issues affecting port operations and are held at large U.S. commercial ports of entry on a monthly basis. Currently, these consultations are generally limited to the U.S. Customs port director and the members of the customs broker community. Utilization of Web broadcasting technology or other communication resources could make these meetings available to other key stakeholders such as shippers and carriers. Given that stakeholder awareness and communication are major causes of border congestion and delay, this alternative could potentially have a significant positive impact on border operations. Real-time Web broadcasting of truck queue lengths at ports of entry would also assist the trade community in avoiding peak traffic periods at U.S.-Mexico gateways.
C-15. Untapped Opportunities to Enhance Broker Process

Description of Issue/Problem

Mexican law requires that a licensed Mexican Customs broker prepare and submit all documentation for cargo entering or leaving that country. As a result, Mexican Customs brokers have assumed a significant degree of control over the border-crossing process. Many of these companies also own border drayage firms, U.S. customs brokers, freight forwarding agencies, and warehouses. Where modern technology and practices have not been leveraged, the provision of services, such as freight classification, stevedoring, drayage, and warehousing, may involve delays and expense that are at cross-purposes with system efficiency. A more streamlined crossing process may not be in the financial interest of some brokers, especially for those whose clients are far-removed from the border and do not view the status quo import/export system as particularly problematic.

Alternative

Automated crossing programs and a shipper/consignee education campaign on efficient crossing procedures would help familiarize supply-chain partners with broker activities and services, and expedite shipments across the border. Web broadcasting of monthly broker-port director meetings could also enhance private-sector understanding of problems contributing to crossing inefficiency.

STANDARDS

C-16. Absence of Standardized Seal Notation Protocol

Description of Issue/Problem

The lack of a standardized procedure for documenting trailer and container seal numbers creates security vulnerabilities and delays in the border-crossing process. In order to ensure that cargo is not tampered with between the shipper’s premises and the border crossing, special seals are applied to the container or trailer door. Once the seal has been applied, the door cannot be opened without breaking the seal.
For northbound shipments that are subject to inspection by Mexican Customs prior to proceeding to the U.S port of entry (Mexican Export Inspections), original seals are replaced. There is no standardized protocol for documenting the replacement of these seals. Inspector signatures, stamps, or other forms of authorization may accompany the new seal number. This regulatory gap often causes U.S. Customs agents at primary inspection booths to view shipments that have had their seals replaced in Mexico with skepticism. These shipments are frequently directed to U.S. secondary inspections. In the absence of a binational protocol governing the sealing and resealing of trailers and containers, authorities cannot determine whether conveyances have been illegally tampered with or opened for legitimate inspection purposes.

*Alternative*

Develop and implement a binational agreement on the procedure for documenting container and trailer seal numbers for shipments moving between Mexico and the United States. Such an agreement would enhance border security and minimize delays due to the unnecessary examination of shipments with replaced seals. Explore opportunities to incorporate this initiative into the development of new regulations governing the physical properties of trailer and container seals.

**C-17. Lack of Harmonized Truck Safety Standards**

*Description of Issue/Problem*

Different commercial vehicle size, weight, and safety standards in the U.S., Canada, and Mexico complicate inspection and enforcement activities at the border.

*Alternative*

An existing NAFTA mechanism—the Land Transportation Standards Subcommittee (LTSS)—is charged with addressing the harmonization of North American trucking standards. With the opening of the border, the LTSS should revitalize its efforts to coordinate with transportation authorities in Mexican, U.S., and Canadian jurisdictions to establish a simplified NAFTA safety protocol for commercial vehicles.
INFORMATION MANAGEMENT

C-18. Information Systems – Excessive Paperwork Preparation and Handling

Description of Issue/Problem

Some northbound border-crossing processes still rely on repetitive and manual paperwork preparation and submission. Currently, the Mexican Export Pedimento, U.S. Inward Cargo Manifest, and Mexican and U.S. bills of lading must be produced in hard-copy format. Repetitive document processing increases the potential for data entry errors, and adds cost, time, and additional steps to the border-crossing process.

The pedimento is usually not prepared by the Mexican broker until the shipment arrives at the border. Although shipment classification and documentation preparation tasks are not normally problematic, hard copies must be submitted to the truck that hauls the shipment across the border. Many brokers employ “runners” to deliver documentation to trucks waiting on roadsides at or near the Mexican export compound. Delays attributable to the preparation and delivery of these documents force some trucks to cross the border during peak, rather than off-peak, periods.

Other inefficiencies associated with the continued use of paper documents include the duplication of data entry activities by various stakeholders. For example, preparation and submission of U.S. entry information involves processes similar to what occurs in Mexico for export movements (Harmonized Tariff Code classification numbers in the U.S. are two digits longer). Each time data is re-entered to generate required paperwork, the risk of information corruption increases. Public and private-sector modernization has begun to alleviate this problem in recent years, but port directors report that shipments are still routinely detained at border crossings due to paperwork problems.

The USDA’s and FDA’s lack of connectivity to the Customs Service’s Automated Commercial System at some ports of entry is a critical coordination shortfall that has exacerbated manual processes at these locales. This is a critical problem for the USDA at the Nogales border crossing where brokers must prepare and submit stacks of paper documentation each morning in order to qualify for the expedited Border Cargo Release (BCR) program. USDA agents must then sift through the documentation manually to determine which shipments require inspection. In spite of the increased use of electronic filing of U.S. entry information, paperwork and
document handling remains an important part of the border-crossing process and a significant contributor to congestion and delay.

**Alternative**

The use of a shared, internet-based information system accessible to authorized stakeholders—as envisioned under the Automated Commercial Environment (ACE) and International Trade Data System (ITDS) programs—would reduce the time, cost and coordination requirements of the border-crossing process. Implementation of a paperless Mexican Export system (similar to the U.S. Export Declaration process), harmonization of U.S. and Mexican Tariff Code reporting requirements, and development of a joint documentation validation system would further streamline the movement of international trade.

**C-19. Information Systems – Antiquated Technology**

*Description of Issue/Problem*

Information systems utilized by some public-sector agencies are outdated and incompatible with one another and those used by the private sector. This hampers efficient stakeholder communication and information-sharing efforts and prolongs the use of duplicate and manual transaction systems.

The main entry documentation system used by the U.S. Customs Service is the Automated Commercial System (ACS). This system was developed in the 1970s to provide an electronic link between U.S. customs brokers and the U.S. Customs Service via a link called the Automated Broker Interface (ABI). The purpose of the ACS and ABI was to facilitate the transmission of information to Customs so that agents could assess the need to inspect a shipment before it arrived at the border. While originally successful in achieving this goal, the systems have since become outdated and plagued by intermittent failures. Sporadic “brown outs” prevent Customs from electronically confirming receipt-of-entry information which, in turn, disrupts the flow of commercial traffic from Mexico to the United States.

Key U.S. agencies involved in the inspection of inbound freight do not have access to these systems at some ports of entry. For example, the USDA and the FDA still solicit hard-copy documents from the trade community for lack of connectivity to the ABI and ACS. Public-sector sources report that the USCS’ ACS interface, the FDA’s Operational and Administrative
System for Import Support (OASIS), and other public agency information systems are outdated, incompatible, unstable, and are not capable of handling additional user loads.

Mexican Customs has its own computer system, the SAAI (Sistema de Automatización Aduanera Integral) that it uses to communicate with Mexican Customs brokers. While this system is more advanced than those employed by U.S. public agencies, it can only be accessed via the Mexican Customs Broker Association and does not replace the need for paper transactions. Several U.S. ports of entry are currently developing stand-alone systems that provide basic information about the driver and conveyance that is not currently available through other electronic means. While these systems may prove valuable on an interim basis, a more comprehensive, long-term solution to trade information management is needed.

Toll collection is another segment of the border-crossing process requiring modernization. With the exception of some gateways outside of Texas, most major commercial border crossings are tolled. Diverse charging mechanisms have been implemented to collect crossing fees. These range from cash, tokens, and tickets to account payment. While a transponder payment system similar to electronic toll collection on freeways is now offered for commercial vehicles at Laredo and other crossings, most trucks are still required to manually pay tolls before proceeding across the border. Manual driver identification and visa verification processes necessitate additional stops within the commercial compound. While some of these delays do not presently create bottlenecks in the system, removing or diminishing surrounding constraints could result in their becoming points of congestion.

**Alternative**

A single, fully integrated information system such as that proposed under ACE is needed to modernize and simplify the border-crossing process and improve stakeholder coordination within the United States and binationally. A system that ties together all stakeholders and disseminates information on a need-to-know basis could drastically reduce data input requirements and stakeholder transactions while protecting information privacy and reducing data corruption. Promotion of standardized trade data requirements and the development of universally compatible technologies (i.e., interoperable transponders and compatible processing systems) for use by stakeholders throughout the supply chain will substantially diminish border delays stemming from data preparation, submission, and analysis.
C-20. No Advanced Threat Detection

Description of Issue/Problem

Most border stations have limited ability to identify and contain security threats at a safe distance from inspection personnel and facilities. The lack of a binational threat detection/response capability is a critical border security and coordination weakness.

Alternative

Explore opportunities to expand intelligence sharing among U.S. and Mexican agencies. Deployment of detection equipment along approach roads distant from the inspection facility could significantly reduce the threats to personnel and facilities and speed the crossing process. Develop a binational contingency plan to deal with threats or attacks at U.S.-Mexico land border crossings.
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