

CBP Vessel APIS Guide

System Identified Errors and Manifest Sufficiency Rates



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Vessel APIS Guide

CBP System Identified Errors and Manifest Sufficiency Rates

The Advance Passenger Information System (APIS) Final Rule (AFR), published on April 7, 2005, requires APIS manifests to be submitted through the United States Coast Guard (USCG) & Customs and Border Protection (CBP) Electronic Notice of Arrival/Departure (eNOA/D) web portal (www.nvmc.uscg.gov) for all commercial vessels arriving from or departing for a foreign port or place. Compliant eNOA/D submissions through this portal work to fulfill both USCG (Notice Of Arrival) and CBP (APIS) reporting requirements.

eNOA/D submissions continue through the eNOA/D web portal on to CBP as an APIS manifest. APIS manifests include traveler data for persons aboard vessels; connecting crossing data to specific persons on specific vessels, traveling on specific voyages.

How CBP Enforces The AFR:

CBP enforces AFR compliance through three types of penalty case initiation processes:

- 1) **No APIS MANIFEST:** A syntactically compliant APIS manifest has not been received by CBP for an arrival from or a departure for a foreign port or place.
- 2) **Late APIS MANIFEST:** An APIS manifest has not been received by CBP within prescribed timelines for an arrival from or a departure for a foreign port or place.
- 3) **Insufficient APIS MANIFEST:** An APIS manifest has been received by CBP that contains invalid, incorrect, or incomplete information.

If an APIS manifest is complete (all necessary records were sent for each passenger and crew member), timely (the manifest was submitted within the AFR timelines), and correct (elements are valid, correct, and complete), requirements of the rule are considered satisfied. If a timely APIS manifest is incomplete and/or incorrect and/or invalid, the manifest is deemed to be “insufficient” and subject to penalty.

As explained in the “Guidelines for the Assessment and Mitigation of Penalties for Failure to Comply with the Electronic Passenger and Crew Manifest Requirements for Vessel and Aircraft”, published December 7, 2005 (CBP DEC. 05-41), vessel APIS penalty cases are assessed against the master of the vessel, in care of the carrier, in the amount of \$5,000 per manifest for each initial infraction. Subsequent violations against the same master are assessed at \$10,000. For further details regarding the

assessment and mitigation of APIS penalties, please refer to the above-referenced Guidelines.

This guide serves to describe the criteria used and the manner in which CBP evaluates an APIS manifest's compliance. APIS manifests are evaluated for submission timeliness, manifest completeness (quantity), data element sufficiency (quality), as well as compliance with AFR validation rule sets (quality).

This guide does not purport to address every possible circumstance under which CBP may issue a penalty in connection with this legal requirement, but is intended as general guidance to assist persons responsible for complying with the APIS regulations. This document does not create or confer any right or benefit on any person or party, private or public.

I. APIS Manifest Completeness

For all commercial vessels (regardless of size) arriving from or departing for a foreign port or place, APIS manifests must be submitted through the eNOA/D web portal (www.nvmc.uscg.gov).

Notices of arrival information submitted outside the eNOA/D web portal (e.g. faxes, non-.xml e-mails, etc.) do not contain or meet all data element submission requirements and are, therefore, non-compliant with CBP regulations.

An APIS manifest is initially assessed for completeness through a comparison of records received versus total onboard count. The CBP APIS system begins overall manifest sufficiency by first determining an onboard percentage:

Example:

Vessel 1: 30 onboard/30 records transmitted = 100% onboard

Vessel 2: 3,000 onboard/3,300 records transmitted = 110% onboard

Vessel 3: 500 onboard/250 records transmitted = 50% onboard

The Vessels 1 and 2 manifests seem to be complete; the number of records submitted to CBP meets or exceeds the number of travelers aboard. Even though APIS manifests should only include travelers aboard, the over-submission of records for Vessel 2 would not in and of itself cause CBP to initiate an APIS penalty.

The Vessel 3 manifest, however, is incomplete and cannot attain a sufficiency rate higher than 50% (the onboard percentage). Vessel 3's manifest would be subject to an APIS penalty.

Note: APIS manifests should only include traveler records for passengers and/or crew physically aboard the vessel. It is incorrect to include debarking or embarking crew or passenger information for travelers not aboard a vessel for a given movement.

II. Manifest Timeliness

For Arrivals Into The United States:

- A) In the case of a voyage of 96 hours or more, an APIS manifest must be submitted at least 96 hours before entering the first United States port or place of destination;
- B) In the case of a voyage of less than 96 hours but at least 24 hours, an APIS manifest must be submitted prior to departure of the vessel;
- C) In the case of a voyage of less than 24 hours, an APIS manifest must be submitted at least 24 hours before entering the first U.S. port or place of destination.

Exception: Vessels engaged in international commercial trade, whose weight is less than 300 gross tons and who are not otherwise required by USCG to provide a notice of arrival, engaged in voyages less than 24 hours in duration, are required to provide an APIS manifest no later than 60 minutes prior to departure from the last foreign port or place.

For Departures From The United States:

An APIS manifest must be submitted no later than 60 minutes before the vessel departs from the United States.

III. Data Element Errors

This section will serve to describe data elements required by the AFR and how they are evaluated for sufficiency. In order to reduce confusion, the data elements are listed by CBP name, eNOA/D online name (in parenthesis), and USCG schema tags.

Last Name (Last Name)

<NOTICE>|<CREW_LIST>|<CREW>|<LAST_NAME>

Example:	Jones
Value Required:	Yes, If Crew is entered then Last_Name is required.
Nullable:	No
Format Rules:	Text, non-case sensitive, Limit 50 characters.
Business Rules:	The value shall be the Last Name, or Surname of the manifested person.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<LAST_NAME>

Example:	Jones
Value Required:	Yes, If NonCrew is entered then Last_Name is required.
Nullable:	No
Format Rules:	Text, non-case sensitive, Limit 50 characters.
Business Rules:	The value shall be the Last Name, or Surname of the manifested person.

CBP Data Element Validation: System Error if missing or invalid. Only alphabetic characters are allowed but inclusion of a hyphen or apostrophe is acceptable.

Examples: O'Neill (no error)
Sm#th (error, illegal character)

First Name (First Name)

<NOTICE>|<CREW_LIST>|<CREW>|<FIRST_NAME>

Example:	John
Value Required:	Yes, If Crew is entered then First_Name is required.
Nullable:	No
Format Rules:	Text, non-case sensitive, Limit 50 characters.
Business Rules:	The value shall be the First Name of the manifested person. If first name is unknown then enter FNU .

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<FIRST_NAME>

Example:	John
Value Required:	Yes, If NonCrew is entered then First_Name is required.
Nullable:	No
Format Rules:	Text, non-case sensitive, Limit 50 characters.
Business Rules:	The value shall be the First Name of the manifested person. If first name is unknown then enter FNU .

CBP Data Element Validation: System Error if missing or invalid. Only alphabetic characters are allowed, and the complete first name is required. Initials are not allowed.

The burden of proof lies with the carrier in cases where a traveler's name consists of only one character and the carrier claims to have submitted the traveler's full name.

Examples: \$ohn (error, illegal character)

In cases where a traveler does not have a first name, the field should not be left blank; it should be filled with "FNU". **The use of "FNU" should be limited to instances where the traveler's legal name consists of one single name.**

An example of commonly mistaken "FNU" cases is the submission of traveler data elements for Indonesian travelers. While many Indonesian travelers do not recognize a break within their multiple names, submitted traveler data should reflect information that is obtained from the travel document via the electronic document reader that scans the machine-readable zone (MRZ) of the travel document.

When Indonesian passports contain an MRZ, the multiple names are split into first and last names. As such, submissions should not include "FNU" first names but rather reflect names as they are (or would be) split in the MRZ.

In those instances where a travel document does not have a machine-readable zone, the data normally so obtained will be collected manually from the biographical page of the travel document.

Date Of Birth (DOB)

<NOTICE>|<CREW_LIST>|<CREW>|<BIRTH_DT>

Example:	2002-05-31
Value Required:	Yes, If Crew is entered then Birth_Dt is required.
Nullable:	No
Format Rules:	Date formatted as YYYY-MM-DD
Business Rules:	The value shall be the birth date of the manifested person.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<BIRTH_DT>

Example:	2002-05-31
Value Required:	Yes, If NonCrew is entered then Birth_Dt is required.
Nullable:	No
Format Rules:	Date formatted as YYYY-MM-DD
Business Rules:	The value shall be the birth date of the manifested person.

CBP Data Element Validation: Numeric - System Error if missing or invalid.

Examples:

2002-05-31 (no error)
1970-13-12 (error, invalid month)
1970-05-32 (error, invalid day)

An incorrect date of birth submitted in a valid format will not generate a system-identified error, but is subject to penalty as an incorrect data element submission.

Document Data (when required) - The AFR requires a passport and/or Alien Registration Card (ARC) when either of these documents is required for travel by law and/or regulation.

Example: A U.S. citizen returning by vessel to the U.S. from within the Western Hemisphere (excluding Cuba) is not currently required to possess or present a passport for entry. APIS, therefore, does not require a document submission from this traveler.

There are four elements associated with document submission; document type, document number, passport country of issuance, and document expiration date.

1) Document Type (ID Type) (when required)

<NOTICE>|<CREW_LIST>|<CREW>|<ID_TYPE>

Example:	Passport Number
Value Required:	Yes, If Crew is entered then ID_Type is required.
Nullable:	No
Format Rules:	Text, non-case sensitive.
Business Rules:	The allowed values for each ID_TYPE are contained in the <ID_Type> element in Person_ID_Type_List.xml.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<ID_TYPE>

Example:	Passport Number
Value Required:	No
Nullable:	No
Format Rules:	Text, non-case sensitive.
Business Rules:	The allowed values for each ID_TYPE are contained in the <ID_Type> element in Person_ID_Type_List.xml. The following precedence should be used when selecting an ID type: Passport Number, Alien Registration Card, Foreign Mariner Document, U.S. Merchant Document.

CBP Data Element Validation: System Error if missing or invalid.

2) Document Number (ID Number) (when required)

<NOTICE>|<CREW_LIST>|<CREW>|<ID_NUM>

Example:	1234567
Value Required:	Yes, If Crew is entered then ID_Num is required.
Nullable:	No
Format Rules:	Alphanumeric, non-case sensitive, Limit 30 characters.
Business Rules:	The value shall be the number from the identifying document.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<ID_NUM>

Example:	1234567
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Value Required: No
Nillable: No
Format Rules: Alphanumeric, non-case sensitive, Limit 30 characters.
Business Rules: The value shall be the number from the identifying document.

CBP Data Element Validation: Data must be alphanumeric – no spaces or special characters (dots, hyphens, number signs, dashes, slashes) allowed.

3) Passport Country of Issuance (Issue Country)

<NOTICE>|<CREW_LIST>|<CREW>|<ID_COUNTRY>

Example: United States
Value Required: No
Nillable: No
Format Rules: Text, non-case sensitive
Business Rules: The allowed values for each ID_COUNTRY are contained in the <Country_Name> element in Country_List.xml.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<ID_COUNTRY>

Example: United States
Value Required: No
Nillable: No
Format Rules: Text, non-case sensitive
Business Rules: The allowed values for each ID_COUNTRY are contained in the <Country_Name> element in Country_List.xml.

CBP Data Element Validation: The value in this field should be the country that has issued the document. (A United States passport issued by the U.S. Embassy in London, England, is still issued by the United States. The Country of Issuance is “United States”.)

4) Document Expiration Date (Expiration Date)

<NOTICE>|<CREW_LIST>|<CREW>|<ID_EXPIRATION_DT>

Example: 2002-12-31
Value Required: No
Nillable: Yes
Format Rules: The value shall be a date formatted as YYYY-MM-DD.
Business Rules: The value shall be the date of Expiration for the ID.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<ID_EXPIRATION_DT>

Example: 2002-12-31
Value Required: No
Nillable: Yes
Format Rules: The value shall be a date formatted as YYYY-MM-DD.
Business Rules: The value shall be the date of Expiration for the ID.

CBP Data Element Validation: Numeric - system Error if missing or invalid.

Traveler Gender (Gender)

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<NOTICE>|<CREW_LIST>|<CREW>|<GENDER>

Example: Female
Value Required: Yes
Nillable: No
Format Rules: Text, non-case sensitive.
Business Rules: The value shall be either **Male**, or **Female** as appropriate and shall designate the gender of the manifested person.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<GENDER>

Example: Female
Value Required: Yes
Nillable: No
Format Rules: Text, non-case sensitive.
Business Rules: The value shall be either **Male**, or **Female** as appropriate and shall designate the gender of the manifested person.

CBP Data Element Validation: System Error if missing or invalid.

Country Of Residence (Country Of Residence)

<NOTICE>|<CREW_LIST>|<CREW>|<COUNTRY_RESIDENCE>

Example: United States
Value Required: Yes, If Crew is entered then COUNTRY_RESIDENCE is required.
Nillable: No
Format Rules: Text, non-case sensitive
Business Rules: The allowed values for each COUNTRY_RESIDENCE are contained in the <Country_Name> element in Country_List.xml.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<COUNTRY_RESIDENCE>

Example: United States
Value Required: Yes, If NonCrew is entered then COUNTRY_RESIDENCE is required.
Nillable: No
Format Rules: Text, non-case sensitive
Business Rules: The allowed values for each COUNTRY_RESIDENCE are contained in the <Country_Name> element in Country_List.xml.

CBP Data Element Validation: System Error if missing or invalid.

Country Of Nationality/Citizenship (Nationality)

<NOTICE>|<CREW_LIST>|<CREW>|<NATIONALITY>

Example: United States
Value Required: Yes, If Crew is entered then Nationality is required.
Nillable: No
Format Rules: Text, non-case sensitive
Business Rules: The allowed values for each Nationality are contained in the <Country_Name> element in Country_List.xml.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<NATIONALITY>

Example: United States

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Value Required: Yes, If NonCrew is entered then Nationality is required.
Nillable: No
Format Rules: Text, non-case sensitive
Business Rules: The allowed values for each Nationality are contained in the <Country_Name> element in Country_List.xml.

CBP Data Element Validation: System Error if missing or invalid.

PNR – Passenger Name Record (Record Locator #) - required when carrier utilizes a passenger record locator system. If a carrier does not employ a passenger record locator system, it is **not** necessary to develop one for APIS submission.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<PASSENGER_RECORD_LOCATOR>

Example: 1234567
Value Required: No
Nillable: No
Format Rules: Alphanumeric, non-case sensitive, Limit 35 characters.
Business Rules: Passenger Record Name Locator value.

IV. Validation Rule Errors

In addition to the errors listed for data elements, system errors will occur for violations of the validation rule sets associated with the condition that an address submission is valid when required and/or that a traveler's nationality is valid (consistent with submitted travel document).

1) US Destination Address Validation Rules:

The AFR exempts the following groups of travelers from US destination address submission:

U.S. citizens
Lawful Permanent Residents (LPR)*
In-Transit Passengers
Crewmembers
Travelers departing the United States

Non-U.S. Resident, non-U.S. National/Citizen passengers who are in transit through the United States (onward foreign travel within 8 hours of arrival into the U.S. port) are exempt from "Address While In The U.S." submissions. The means of indicating an in-transit passenger through eNOA/D is to submit the following:

U.S. Street Address = "IN TRANSIT TO FOREIGN"
City = blank
State = blank
Zipcode = "99999"

* Travelers to the U.S. lawfully admitted within a visa classification ARE NOT Lawful Permanent Residents. Their residence is not "USA" and a U.S. destination address is required in these cases.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<US_ADDRESS_STREET>

Example:	123 Main Street
Value Required:	No
Nullable:	No
Format Rules:	Alphanumeric, non-case sensitive, Limit 35 characters.
Business Rules:	The value shall be the Street for the person's address while in the US.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<US_ADDRESS_CITY>

Example:	Miami
Value Required:	No
Nullable:	No
Format Rules:	Text, non-case sensitive, Limit 35 characters.
Business Rules:	The value shall be the City for the person's address while in the US.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<US_ADDRESS_STATE>

Example: Florida
Value Required: No
Nillable: No
Format Rules: Text
Business Rules: The value shall be the State for the person's address while in the US. The allowed values for each State Name are contained in the <State_Name> element in State_List.xml.

<NOTICE>|<NONCREW_LIST>|<NONCREW>|<US_ADDRESS_ZIP>

Example: 33125
Value Required: No
Nillable: No
Format Rules: Alphanumeric, non-case sensitive, Limit 9 numeric characters.
Business Rules: The value shall be the Zip Code for the person's address while in the US.

*Non-U.S. Resident, non-U.S. National/Citizen passengers who are in transit through the United States (onward foreign travel within 8 hours of arrival into the U.S. port) are exempt from "Address While In The U.S." submissions.

Carriers must submit U.S. destination address for all arriving visitors to the United States. The U.S. destination address submission should include valid street, city, state, and zip code data.

Blatantly invalid data submissions will be flagged for error and may result in penalty case action (i.e., "Unknown", "refused", "Passenger declined", etc.)

2) Nationality Validation Rules

If passport data is submitted as a traveler's travel document, the country of issuance for the submitted passport must equal the value submitted in the Nationality field.

Example 1 (NO ERROR) - an error for incorrect document submission **WILL NOT** be assessed for the following set of data elements:

Nationality/Citizenship: "FRANCE"

Doc Type: "P"

Doc Number: 456789012

Issuing Country: "FRANCE"

The submission of French passport data does substantiate the "FRANCE" nationality submission.

Example 2 (ERROR) - an error for document submission data **WILL** be assessed for the following set of data elements:

Nationality/Citizenship: "FRANCE"

Residency: "USA"

Doc Type: "Passport Number"

Doc Number: 456789012

Issuing Country: "United States"

The submission of United States passport data does not substantiate or corroborate the French nationality submission. Because the "FRANCE" nationality data conflicts with (USA) nationality data within the United States passport, an error is assessed against the Nationality field submission.

V. How CBP Calculates APIS Manifest Sufficiency Rates:

There are three components to sufficiency rate calculations:

Onboard Count - For vessels, the onboard count is obtained from the entrance or clearance documentation presented by the carrier. This is a total count of crew and/or passengers.

Records Transmitted – APIS tabulates the total number of unique records transmitted by the carrier for a given manifest.

System Identified Errors – APIS tabulates the number of individual records within a manifest where one or more system errors has been identified and associated with the record.

Sufficiency rates are calculated by first establishing an **onboard percentage**. This is a percentage derived by the records transmitted divided by the onboard count. The carrier provides the **Onboard Count** value through entry/clearance document submissions.

	Onboard Count	Records Transmitted	Onboard Percentage	Records Over or Missing	System Identified Errors	Sufficiency Rate
Vessel 1	100	100	100.0%	0	0	100%
Vessel 2	100	100	100.0%	0	5	95%
Vessel 3	100	200	200.0%	+100	0	100%
Vessel 4	100	200	200.0%	+100	5	95%
Vessel 5	100	50	50.0%	-50	0	50%
Vessel 6	100	50	50.0%	-50	5	45%
Vessel 7	100	0	0.0%	-100	0	0%

In the examples above, the sufficiency rates are determined by:

- Vessel 1 – 100%, 0 missing, 0 invalid records
- Vessel 2 – 95%, 0 missing, 5 invalid records
- Vessel 3 – 100%, 0 missing (100 too many), 0 invalid records
- Vessel 4 – 95%, 0 missing (100 too many), 5 invalid records
- Vessel 5 – 50%, 50 missing, 0 invalid records
- Vessel 6 – 45%, 50 missing, 5 invalid records
- Vessel 7 – 0%, 100 missing, 0 invalid records

APIS Guide Updates:

The most recent version of this guide can be found at www.cbp.gov.

Contact Information:

Please direct all questions, comments, or concerns about this guide to:

Deborah S. Nesbitt
National APIS Account Manager
US Customs and Border Protection
409 727 0285, Extension 238
Deborah.nesbitt@dhs.gov