



AES: Automated Export System Lessons Learned

Bill Chappell

William.chappell@cns.doe.gov

Export Compliance Office

Consolidated Nuclear Security, LLC

UNCLASSIFIED

This document has been reviewed by a Y-12 DC/UCNI-RO and has been determined to be UNCLASSIFIED and contains no UCNI. This review does not constitute clearance for public release.

Name: Sara Webb

Date: 1-15-15

AES Purpose

- U.S. Census/Customs automated system
- Mandated by 15 CFR 30
- “AES is a nationwide system operational at all ports and for all methods of transportation. It was designed to assure compliance with and enforcement of laws relating to exporting, improve trade statistics, reduce duplicate reporting to multiple agencies, and improve customer service.” (U.S. Customs and Border Protection)

The Census Bureau is responsible for collecting, compiling, and publishing export trade statistics for the United States under the provisions of Title 13, United States Code, Chapter 9, Section 301. The Automated Export System (AES) is the primary instrument used for collecting export trade data, which are used by the Census Bureau for statistical purposes. (Federal Register, Volume 79 Issue 177(Friday, September 12, 2014))

AES Requirements

Required on any foreign shipment that meets the following:

- Over \$2,500
- Requires an Export License
 - Is under an NRC General License
- Canada Requirements
 - No \$\$ threshold
 - Only license requirement
 - License by any agency of the US govt
 - All exports still need to be screened against the various US denial lists

AES Lessons Learned

- Conducted a review of our AES processing
 - Task to file sits in Transportation
- Review found we hadn't been doing AES filing as needed
 - Person handling AES filings had retired
- Immediately contacted AES
 - Get guidance on filing a Voluntary Self Disclosure (VSD)
 - Understand how process works

AES Lessons Learned

- Called our freight forwarders
 - Our freight forwarders were filing on our behalf
- FedEx
 - Will catch the shipments and file for you if it hits the \$ threshold or you identify the AES is necessary
 - It is based on the information you enter on the website (potential fail point)
- Need to file a VSD for those shipments not filed
 - Back file
 - 12 Shipments weren't filed
 - Under NRC General Licenses



Disclaimer

This work of authorship and those incorporated herein were prepared by Consolidated Nuclear Security, LLC (CNS) as accounts of work sponsored by an agency of the United States Government under contract DE-NA0001942. Neither the United States Government nor any agency thereof, nor CNS, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, use made, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately owned rights. Reference herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise, does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government or any agency or contractor thereof, or by CNS. The views and opinions of authors expressed herein do not necessarily state or reflect those of the United States Government or any agency or contractor thereof, or by CNS.