



EEI Filings

Who what where when why & how

Electronic Export Information

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- ◆ Audits & Disclosures
- ◆ Antidumping & Countervailing Duties
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- ◆ Supply Chain Security & CTPAT
- ◆ Import & Export Optimization Strategies
- ◆ In- & Out-sourced Trade Operations
- ◆ Documentation Requirements
- ◆ Tariff Classification
- ◆ Duty Preference Programs
- ◆ International Business Strategy

International Trade & Compliance

Star USA has proudly served the international trade community since 1996.

Originally founded with a singular mission: equip the trade community with the knowledge and skills needed to excel at trade compliance.

Star USA is a proud member of CTPAT.

Star USA is your strategic resource and tactical partner for navigating global commerce & trade compliance.



Today we'll focus on:

1. EEI basics to know
2. Filing fundamentals & accountability
3. Tips & resources, Q&A

A rose by any other name...
What do you call it?

1. EEI
2. AES
3. ACE
4. FTR
5. SED
6. SLI
7. PITA

Poll Break!



Know what
you need
and where
to get it.

Knowledge comes first.

EI basics that you'll need to know

- Rules, Roles & Regulations
- Exemptions & Exceptions
- Penalties

Foreign Trade Regulations (FTR).

U.S. Census Bureau
Dept. of Commerce

15 CFR Part 30

For more info:

- ◆ [15 CFR Part 30](#) – Foreign Trade Regulations

Key Terms & Phrases

Export in the FTR is defined as:

- ◆ to send or transport goods out of a country

Not exports:

- ◆ Software, other than mass market
- ◆ Services
- ◆ Information

- ◆ The FTR is not the same as the EAR or ITAR – different agencies with their own sets of rules.
- ◆ The definition of an export is *different* for EAR & ITAR.

EEI, AES and ACE

What they are, how they work together

For more info:

- ◆ [15 CFR 30.1](#)

Key Terms & Phrases

EEI – Electronic Export Information

- ◆ The electronic export data as filed in the AES.

AES – Automated Export System

- ◆ The system for collecting EEI from persons exporting goods from the United States
- ◆ The AES is currently accessed through ACE

ACE – Automated Commercial Environment

- ◆ A CBP authorized electronic data interchange system for processing import and export data

USPPI & FPPI

The most interesting parties, in principle.

Principal Parties in Interest.

For more info:

- ◆ [15 CFR 30.3\(b\)](#)

Key Terms & Phrases

USPPI – US Principal Party in Interest

- ◆ The person or legal entity in the United States that receives the primary benefit of the export transaction
- ◆ Generally: **the Seller**

FPPI – Foreign Principal Party in Interest

- ◆ The party abroad who purchases the goods for export, or to whom final delivery or end-use will be made.
- ◆ May be the Ultimate Consignee
- ◆ Generally: **the Buyer**

Authorized Agents

Representing exactly *one* PPI.

For more info:

- ◆ [15 CFR 30.3\(f\)](#)

Key Terms & Phrases

Authorized Agent

- ◆ Authorized by the **USPPI in Non-Routed Transactions**
- ◆ Authorized by the **FPPI in Routed Transactions**
- ◆ Agents must have a power of attorney or written authorization from a PPI to file the EEI on their behalf.
- ◆ “Agent”, “Filer”, “Filing Agent”, etc. are pretty much synonymous
- ◆ Freight Forwarders are the most common parties acting as the Authorized Agents

Which of the following apply to you?

1. I file EEI in AES or other software
2. I work for a USPPI
3. I work for a Filer/Agent (Forwarder. Broker)
4. I work for an FPPI
5. I fill out SLIs
6. I collect info from internal parties
7. I collect info from external parties
8. I report on EEI & Export Activity
9. None of the above, I just want my CEU at the end

Poll Break!

Timing

EEL is required for Any Mode of Transport

For more info:

- ◆ [15 CFR 30.4](#)

Modes of Transport & Timing

Truck

- ◆ 1 hour prior to arrival at the border

Rail

- ◆ 2 hours prior to arrival at the border

Vessel / Ocean

- ◆ 24 hours prior to lading

Air

- ◆ 2 hours prior to departure

Best Practices

- ◆ USPPi provides docs with all data elements to the Agent days ahead of the scheduled pickup
- ◆ Agent files the EEL once the export shipping facts are established, doubling or tripling the minimum cutoffs.

Common Exemptions

Knowing when EEI *is* required, now we can better understand when EEI *is not* required

For more info:

- ◆ [15 CFR § 30 Subpart B](#); [Subpart D](#)

Common Exemptions

- ◆ Shipments where the Ultimate Consignee is in Canada
- ◆ Commodities under \$2500 per Schedule B
- ◆ Tools of trade & their containers
- ◆ Shipments from one point in CA or MX to another point in the same country by routes through the U.S.

Not Exempt under any circumstance

- ◆ Any licensable shipments, i.e. BIS, EAR, DDTC, ITAR, DEA, NRC, OFAC, etc.
- ◆ Subject to ITAR but exempt from license
- ◆ Rough Diamonds
- ◆ Self-propelled vehicles

The One Rule



EEl Filing is required when...

All goods being sent from 1 USPPI to 1 Consignee in 1 Country of destination on 1 Conveyance on the Same Day.

Key Terms & Phrases

- ◆ One USPPI
- ◆ One Foreign Consignee
- ◆ One Destination Country
- ◆ One Conveyance
- ◆ One Day

In all other cases, multiple EEl Filings are required.

Which of the following are NOT part of the One Rule?

1. One USPPI
2. One Two
3. One Conveyance
4. One Day
5. One Consignee
6. One Good
7. Once Upon A Time
8. One FPPI
9. One Destination

Poll Break!

FTR Penalties



Civil Penalties

◆ Failure to File	\$10,000 + Forfeiture
◆ Late Filing	\$1,100 per day, up to \$10,000
◆ False or Misleading Information	\$10,000 + Forfeiture
◆ Furtherance of Illegal Activity	+ Any other penalty imposed by law
◆ Other Violations	

Criminal Penalties

◆ Failure to File	\$10,000 + Forfeiture
◆ False or Misleading Info	+ Up to 5 years prison
◆ Furtherance of Illegal Activity	per violation

Forfeiture Penalties

- ◆ Any interest in property of any kind in the goods or items subject to the violation
- ◆ Any interest in tangible property used in the export or attempt
- ◆ Any property constituting or derived from any proceedings, obtained directly or indirectly

For more info:

- ◆ [15 CFR 30.71](#)



**Know your
role and
how to do it.**

Knowledge comes first.

It's crucial to understand the nature of the transaction, what your role is, and how to fulfill your responsibilities correctly.

- Routed & Non-Routed
- Data Elements
- Working with People

Routed & Non-Routed Exports

There are 2 types of export transaction under the FTR.

Routed Transactions

Explicitly defined in [15 CFR § 30.1](#) as:

- ◆ A transaction in which the FPPI authorizes a U.S. Agent to facilitate export of items on its behalf and to prepare and file the EEI
- ◆ FPPI assumes responsibility for filing
- ◆ FPPI authorizes an Agent

Non-Routed Transactions

- ◆ Not defined
- ◆ Any transaction which does not meet the definition of Routed
- ◆ aka “Standard” export
- ◆ USPPI assumes responsibility for filing
- ◆ USPPI may self-file or use an Agent

Regulatory Responsibilities



Routed Transactions

USPPI

- ◆ Provide FPPI's agent with 12 required data elements in §30.3(e)(1)
- ◆ Recordkeeping requirements

FPPI

- ◆ Authorize a U.S. Agent

Authorized Agent

- ◆ Receive & retain authorization
- ◆ File the EEI
- ◆ Provide evidence of filing to USPPI
- ◆ Recordkeeping

Non-Routed Transactions

USPPI

- ◆ Authorize an Agent or Self-file
- ◆ Provide Agent w/ Accurate & Timely Info
- ◆ Adhere to all filing requirements in §30.6
- ◆ Recordkeeping

FPPI

- ◆ *None*

Authorized Agent

- ◆ Receive & retain authorization
- ◆ File the EEI
- ◆ Provide evidence of filing to USPPI
- ◆ Recordkeeping

For more info:

- ◆ [15 CFR 30.3\(e\)\(1\)](#)

Data Elements

There are 48-ish Data Elements that need to be filed on the EEI

Mandatory – *In all cases*

- ◆ Who is shipping the goods
- ◆ Who is receiving the goods
- ◆ Where are the goods going
- ◆ How and when is it going to leave
- ◆ What the goods are

Conditional – *As the case may be*

- ◆ Other parties to the transaction
- ◆ Export Control information
- ◆ Special Exports

Optional – *As the PPI may require*

- ◆ Seal Number
- ◆ Equipment Number

For more info:

- ◆ [15 CFR 30.6](#)

Working with Real Humans

Everyone's got their own expectations

Stuff to have on your radar...

- ◆ Freight Forwarders
- ◆ Shippers
- ◆ Customs Brokers
- ◆ Shippers Letters of Instruction (SLIs)

- ◆ Foreign Buyers
- ◆ Related Parties
- ◆ Incoterms® Rules
- ◆ Triangle shipments, Cross-trades, and other non-standard shipping practices

- ◆ Voluntary Self Disclosure (VSD)



Before we do Q&A

Star is planning our first Women's Summit this November in Cleveland.

It'll be a mix of learning, community, and mentorship for women in the industry, and we'll share more details soon.

If anyone wants to learn more in the meantime, just reach out to us at train@starusa.org

Stick around for Q & A!



Thank you!



1 LCB/CES credit available
from watching the [recording](#) until 7/14/2026

USMCA: Unlocking the Benefits of Free Trade Agreements



U.S. Customs and Border Protection



Partner Accreditor for CBP's Customs Brokers
Continuing Education Program