# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0156** (RTC-59282) |
| **Related Incident ID** | IM475951 |
| **RFC Initiator / Organization** | NA-CH |
| **CI** | **NCTS-P5 (DDNTA-v5.14.1-v1.00 – CSE-v51.6.0)** |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | IE150/IE151 structure update for contact details in the country of competent authority in order to reassure the smooth transition and increase the quality of (structured) data exchanged in NCTS-P5 (avoiding also the manual exchange of IE144/IE145). | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes No** |

***Change Summary***

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| **NCTS-P5: (DDNTA-v05.14.1 CSE-v51.60) - IE150/IE151 structure update for contact details in the Country Of Competent Authority** |
| According to article 117(3) of Appendix I to the CTC and article 85(2) DA the competent authority of recovery shall "within three years from the date of acceptance of the transit declaration, notify the guarantor that he is or might be required to pay the debt for which he is liable in respect of the Union transit operation in question".  The transit manual further explains that "To facilitate claims against the guarantor, s/he is required to be established in the Contracting Party where the guarantee for a given common transit operation is provided, and to give an address for service or appoint an agent in each of the Contracting Parties involved in that operation".  If the *Competent Authority for Recovery* is the one at *Destination*, then this competent authority doesn't know about the address, to which such claims and / or notifications about non discharged transit procedures shall be addressed.  In NCTS-P4 there are two possibilities to let the Competent Authority at Destination know about the address:   * In the IE150 there is a text field "*Contact details in country of competent authority*" * The competent authority at destination sends an IE034 to the office of guarantee at departure requesting the address via TC30   In NCTS-P5 the data element "*Contact details in country of competent authority*" in message IE150/IE151 is missing and it is also not foreseen to exchange message IE034 / IE037 between different customs offices, but only between the ‘Holder of the Transit Procedure’ and the ‘Customs Office of Guarantee’.  In this RFC-Proposal, the change includes the addition of the necessary information in the IE150/IE151 messages in order to avoid loss of information during the Transitional Period and to avoid the exchange of IE145/IE144 during TP and post-TP. |

**Section 2: Problem statement**

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| Various NAs reported that a loss of information is not acceptable in case of UPGRADE from NCTS-P4 (DDNTA-v20.00) to NCTS-P5 (DDNTA-v5.14.0 based on CSE-v51.6.0) for the messages IE150 and IE151:  In NCTS-P4, the country of departure (at least for some NAs) is able to send   * The address and contact details of the guarantor in the country of departure (i.e. the NA sending the message IE150) * The address and contact details of the guarantor (its agent) in the country of the competent authority (i.e. the NA receiving the message IE150)   The field “Contact details in country of competent authority” is built automatically, using data stored in the DB, with no human intervention required.  If the data from that NCTS-P4 field are lost during the UPGRADE or it cannot be provided in the NCTS-P5 messages, then a workaround must be defined by the NA. This workaround requires the exchange of IE145/IE144 to request and to send the information.  **From DDNTA-5.14.0-v1.00 (NCTS-P5):**  **Part of CD150C:**  (…) ---GUARANTEE REFERENCE 99x D C0004 ------GUARANTOR 1x D C0014 Identification number O an..17 B2101 G0002 Name R an..70 E1104 ---------ADDRESS 1x R Street and number R an..70 E1104 Postcode D an..17 C0505 E1102 City R an..35 Country O a2 CL070 B2101 ---------CONTACT PERSON 1x O G0105 Name R an..70 Phone number R an..35 E-mail address O an..256 G0002 (…)  **Part of CD151C:** (...)  ---GUARANTEE REFERENCE 99x D C0025 ------GUARANTOR 1x D C0014 Identification number O an..17 B2101 G0002 Name R an..70 E1104 ---------ADDRESS 1x R Street and number R an..70 E1104 Postcode D an..17 C0505 E1102 City R an..35 Country O a2 CL070 B2101 ---------CONTACT PERSON 1x O G0105 Name R an..70  Phone number R an..35 E-mail address O an..256 G0002 (…)  **From DDNTA-v20.00 (NCTS-P4):**  **Part of CD150A:**  (...)  ------GUARANTOR Name R an..35 Street and number R an..35 Postal code R an..9 City R an..35 NAD LNG O a2 CL012 TR0099 Contact details in country of competent authority R an..140 TIN O an..17 (…)  **Part of CD151A:** (…)  ------GUARANTOR Name R an..35 Street and number R an..35 Postal code R an..9 City R an..35 NAD LNG O a2 CL012 TR0099 Contact details in country of competent authority R an..140 TIN O an..17 (…)  However, in NCTS.P4, the data element “Contact details in country of competent authority”   * includes concatenated information (i.e. not structured); * is restricted to 140 characters maximum.   This is not aligned to the NCTS-P5 philosophy.  Finally, the B2101 applied on GUARANTOR / Identification number should be removed because there is no TIN granted by some NAs to their GUARANTOR. |

**Section 3:** **Description of proposed solution**

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| The **DDNTA-v5.14.1 - CSE-v51.6.0 (incl. Appendix Q2) and the CSE-v51.6.0** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):  The definition of the CD150C and CD151C is modified, to ensure that those messages include   * structured (and consistent) information about:   + The address and contact details of the guarantor in the country of departure (i.e. the NA sending the message IE150)   + The address and contact details of the guarantor (its agent) in the country of the competent authority (i.e. the NA receiving the message IE150) * BRTs and TRTs that enable a smooth (and standard) transition from NCTS-P4 and NCTS-P5.   The BRT-B2400 will be extended to disable the Data Item for the Post Transitional Period (i.e. used during the TP). The wording of B2400 is the following:  In addition, after the end of the Transitional Period (only), the IE150 and IE151 messages can include the information of the agent in the country of the competent authority. This is regulated by the existing Technical Rule E1301 that will be extended.  ***The updated structure of CD150C and CD151C:***  **Part of CD150C:**  (…) ---GUARANTEE REFERENCE 99x D C0004 ------GUARANTOR 1x D C0014  Contact details in country of competent authority O an..140 B2400  Identification number O an..17 ~~B2101~~ G0002 Name R an..70 E1104 ---------ADDRESS 1x R Street and number R an..70 E1104 Postcode D an..17 C0505 E1102 City R an..35 Country O a2 CL070 B2101 ---------CONTACT PERSON 1x O G0105 Name R an..70 Phone number R an..35 E-mail address O an..256 G0002  ---------~~REPRESENTATIVE~~ AGENT IN COUNTRY OF COMPETENT AUTHORITY 1x O E1301 Identification number O an..17  Name R an..70  ------------ADDRESS 1x R Street and number R an..70 Postcode D an..17 C0505 City R an..35 Country R a2 CL070  ------------CONTACT PERSON 1x O G0105 Name R an..70 Phone number O an..35 E-mail address O an..256 G0002  **Part of CD151C:** (…) ---GUARANTEE REFERENCE 99x D C0025 ------GUARANTOR 1x D C0014  Contact details in country of competent authority O an..140 B2400Identification number O an..17 ~~B2101~~ G0002 Name R an..70 E1104 ---------ADDRESS 1x R Street and number R an..70 E1104 Postcode D an..17 C0505 E1102 City R an..35 Country O a2 CL070 B2101 ---------CONTACT PERSON 1x O G0105 Name R an..70  Phone number R an..35 E-mail address O an..256 G0002 ---------~~REPRESENTATIVE~~ AGENT IN COUNTRY OF COMPETENT AUTHORITY 1x O E1301 Identification number O an..17  Name R an..70  ------------ADDRESS 1x R Street and number R an..70  Postcode D an..17 C0505  City R an..35 Country R a2 CL070  ------------CONTACT PERSON 1x O G0105 Name R an..70 Phone number O an..35 E-mail address O an..256 G0002  With **B2400** that will be updated as follows:  **Technical Description:** IF <Decisive Date> is GREATER than <TPendDate> THEN /\*/Consignment/Incident = "N"; IF <Decisive Date> is GREATER than <TPendDate> THEN /\*/Enquiry/returnCopyReturnedDate = "N"; IF <Decisive Date> is GREATER than <TPendDate> THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"; IF <Decisive Date> is GREATER than <TPendDate> THEN /\*/Consignment/HouseConsignment/ConsignmentItem/TransportDocument = "N"; IF <Decisive Date> is GREATER than <TPendDate>THEN /\*/Consignment/HouseConsignment/ConsignmentItem/TransportCharges = "N"; IF <Decisive Date> is GREATER than <TPendDate> THEN /\*/GuaranteeReference/Guarantor/contactDetailsInCountryOfCompetentAuthority = "N”.  **Functional Description:** N/A  With **E1301** that will be updated as follows:  **Technical Description:** IF <Decisive Date> is LESS than or EQUAL to <TPendDate> THEN /\*/Consignment/PreviousDocument AND /\*/Consignment/SupportingDocument AND /\*/Consignment/TransportDocument AND /\*/Consignment/AdditionalReference AND /\*/Consignment/AdditionalInformation AND /\*/Consignment/HouseConsignment/countryOfDispatch AND /\*/Consignment/HouseConsignment/referenceNumberUCR AND /\*/Consignment/HouseConsignment/Consignor AND /\*/Consignment/HouseConsignment/Consignee AND /\*/Consignment/HouseConsignment/DepartureTransportMeans AND /\*/Consignment/ HouseConsignment/PreviousDocument AND /\*/Consignment/HouseConsignment/SupportingDocument AND /\*/Consignment/HouseConsignment/TransportDocument AND /\*/Consignment/HouseConsignment/AdditionalReference AND /\*/Consignment/HouseConsignment/AdditionalInformation AND /\*/Consignment/HouseConsignment/TransportCharges AND /\*/GuaranteeReference/Guarantor/~~Representative~~AgentInCountryOfCompetentAuthority  shall not be used  **Functional Description:** N/A  **DMP Package-v5.6.0 SfA-v1.00:**  This file will be updated to include the changes of the messages CD150C and CD151C as described above.  **NCTS-Data Mapping- v0.43 file:**  The **Data Item** ‘*Contact details in country of competent authority*’ in NCTS-P4 will be mapped directly with the new Data Item ‘*Contact details in country of competent authority*’ applicable in NCTS-P5.  The Resolution for Upgrade and Downgrade will be the following (similar for IE150 and IE151):  **Resolution for Upgrade:**   * If one NTA-P5 in operations is not yet aligned to DDNTA-5.15.0, the ieCA will drop the information provided by NTA-P4 * As soon as all NTA-P5 in operations are aligned to DDNTA-5.15.0, the ieCA will re-use the information provided by NTA-P4   **Resolution for Downgrade:**  No issue for Downgrade:   * IF the NTA-P5 produced a CD150C aligned to DDNTA-5.14.1 OR   Or, the NTA-P5 produced a CD150C aligned to DDNTA-5.15.0 but it does not include information (Data Item is optional during TP)  THEN the ieCA is inserting “Not available - Inserted by ieCA” in the CD150A   * IF the NTA-P5 produced a CD150C aligned to DDNTA-5.15.0, which includes information, this information is re-used by ieCA to create the CD150A to be sent to NTA-P4.   **Special case for NAs with NTA-P4 and NTA-P5 DBs synchronized:**  A native CD150C received directly from an NTA-P5 (without conversion by ieCA) may be valid without this (optional) Data Item, creating problem when duplicated to the NTA-P4. To avoid such problems, the CD150C should be always sent to ieCA for DOWNGRADE, before upload in NTA-P4 and then copy to NTA-P5.  The CD150A received by the NA will be sent to ieCA for UPGRADE only when the ieCA is aligned to DDNTA-5.15.0; else the ieCA will drop information in CD150C (> inconsistency between NTA-P4 and NTA-P5).  For the new **Data Group** <GUARANTEE REFERENCE.GUARANTOR.~~REPRESENTATIVE~~ AGENT IN COUNTRY OF COMPETENT AUTHORITY>  The Resolution for Upgrade and Downgrade will be the following:  **Resolution for Upgrade:**  No issue for Upgrade. The Data Group is optional.  **Resolution for Downgrade:**  No issue for Downgrade. The Data Group is not used during the Transitional period due to E1301 assigned on it.  **IMPACT ASSESSMENT:**  This RFC-Proposal impacts only two Common Domain messages (i.e. not National Domain, not External Domain).  It requires an upgrade of the ieCA (immediately) after the NTA-P5 already operational in NCTS-P5 have been upgraded to DDNTA-5.15.0. (see below the *Proposed date of applicability in Operations*)  For the NAs starting after the *Proposed date of applicability in Operations*, the change must be applied in their NTA before starting their NCTS-P5 operations.    **Risk of not adopting this change**: The exchange of information is no more automated, it requires some extra efforts by the NHD. Not blocking but loss of efficiency.  **Risk of not implementing this change**: The change must be applied according to the timing recommended, to avoid loss of information [during TP] or rejections of the recovery request message (the IE150 is an important one) [after TP].  **Proposed** date of applicability in Operations (**T-Ops**):   01.12.2022  (or when the NTA starts NCTS-P5 operations)  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  February 2022  **Impact on transition**: No  **Impacted messages:**   * Common Domain Messages: CD150C and CD151C     **Impacted CIs:**  **• CSE-v51.6.0: Yes;**  **• DDNTA-5.14.1 (Appendix Q2, PDFs, XLSX): Yes;**  **• DMP Package-5.6.0 SfA-v1.00 (incl. NCTS- Data Mapping- v0.43 file): Yes;**  **• CTS-5.7.0-v1.00: Yes;**  **• CRP-v5.6-v1.00: Yes;**  **• ACS-5.6.0 & ACS-Annex-NCTS: 5.6.0: Yes;**  **• CTP-5.8.0-v1.00: Yes;**  **• NCTS\_TRP-5.8.1-v1.00: Yes;**  • Functional Specifications (FSS/BPM): No;  • UCC IA/DA Annex B: No;  • DDCOM-20.3.0-v1.00: No;  • DDNTA-5.14.0-v1.00 (Main Document): No;  • ieCA 1.0.3.0: No;  • AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No;  • CS/MIS2\_DATA: No; |

**Impact on CI artefacts**

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| **CSE-v51.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **As described in section 3** | |
| **DDNTA-5.14.1-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices generated by CSE + Appendix Q2\_R\_C, K** | |
| **DMP Package-v5.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **NCTS- Data Mapping- v0.43 file on conversion resolution fields; the list of R&C; the XLS files with IE150 and IE151 messages.** | |
| **CTS-5.6.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of XSLT files according to the updates of specifications.** | |
| **NCTS\_TRP- 5.8.1-v1.01** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of messages according to the updates of specifications.**  **Impact on Templates (some data sets are changed).** | |
| **CTP-5.8.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of test data according to the updates of specifications. (to be precised)** | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Each NA shall incorporate the new structure of CD150C and CD151C to their NTA.**  **The NAs not using the ieCA also need to use new XSLT files.**  **Extra testing is required.** | |

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 13/12/2021 | *Draft by CUSTDEV* |
| v0.11 | Updates by CUSTDEV | 15/12/2021 | Version update |
| v0.12 | Updates by CUSTDEV | 17/01/2021 | Addition of 3 new Data Groups |
| v0.50 | Major update (by CD3 and TAXUD/B3) | 26/01/2022 | Taking into account the comments received from NAs during the review cycle of RFC-List.36. |
| v1.00 | SfA to NPMs | 07/02/2022 | Comments from NA-CH (Agent) and NA-DE applied (B2101). |