# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0173** (RTC-59802) |
| **Related Incident ID** | - |
| **RFC Initiator / Organization** | **NA-NL** |
| **CI** | **NCTS-P5 (DDNTA-5.14.1 – CSE-v51.6.0)** |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | |  | |
| **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-5.14.1 - CSE-v51.6.0): HOLDER OF THE TRANSIT PROCEDURE.Identification number inconsistency in optionality** |
| In the Data Group “HOLDER OF THE TRANSIT PROCEDURE” in the CC015C the attribute “Identification number” is ***Optional***. The optionality is explained in the Guidance rule G0120:  *The Data Item ‘Identification number’ is required for the Data Group ‘HOLDER OF THE TRANSIT PROCEDURE’, except for:*  *- economic operators residing outside of the common transit countries (outside CL009), and*  *- private individuals for which an identification number may be used but is not required.*  In some other messages (including response to trade CC051C and in CC054C, CC170C and CC022C) this attribute is ***Required***.  To avoid this inconsistency in the optionality, this RFC-Proposal aims to include also the attributes HOLDER OF THE TRANSIT PROCEDURE. Name and the Data Group ADDRESS in the messages IE051, IE054, IE170 and IE022. In that case, C0250 will validate if the identification number or the Name and Address should be inserted in those messages aligned to the CC015C. |

**Section 2: Problem statement**

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| In NCTS-P5 DDNTA-5.14.1-v1.00 (based on CSE-v51.6.0), the following issue was identified:  The Data Item ‘HOLDER OF THE TRANSIT PROCEDURE. Identification number’ is sometimes defined as **Required** and sometimes defined as **Optional** (as explained in G0120). This inconsistency creates difficulties.  The guideline **G0120** is aligned to the legislation with the following description:    To avoid problems in the response messages, all the Data Elements of the Holder of the Transit Procedure in all response messages (and some other messages) shall be added, with C0250 that validates if the identification number or the name & address should be inserted in the response messages.  The problem was identified in messages **CC014C, CC022C, CC026C, CC051C, CC054C and CC170C where the G0120 should also be applicable.**  In **CC014C** we have:    In **CC022C** we have:    In **CC026C** we have:    In **CC051C, CC170C** we have:    In **CC054C** we have:    To resolve the inconsistency:  i) The Data Item ‘HOLDER OF THE TRANSIT PROCEDURE. Identification number’ should become **Optional** with **G0120** assigned  ii) The Data Item ‘HOLDER OF THE TRANSIT PROCEDURE. Name’ and the Data Group ‘HOLDER OF THE TRANSIT PROCEDURE. ADDRESS’ should be added as **Dependent** with C0250. |

**Section 3: Description of proposed solution**

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| The **DDNTA-5.14.1 (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 message structure of **CC014C** shall be updated as follows:  (…)  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  Identification number ~~R~~ O an..17 G0120, R0850  TIR holder identification number D an..17 C0904, G0002  Name D an..70 C0250  ------ADDRESS 1x D C0250  Street and number R an..70  Postcode D an..17 C0505  City R an..35  Country R a2 CL248  Similar for the update of **CC022C, CC026**, **CC051C, CC170C**  The message structure of **CC054C** shall be updated as follows:  (…)  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  Identification number ~~R~~ O an..17 G0120, R0850  TIR holder identification number D an..17 C0904, G0002  Name D an..70 C0250  ------ADDRESS 1x D C0250  Street and number R an..70  Postcode D an..17 C0505  City R an..35  Country R a2 CL248  **NCTS-Data Mapping- v0.43 file**: The file will be updated to depict the change regarding the messages CC014C, CC026C, CC051C, CC054C and CC170C as described above.  **IMPACT ASSESSMENT:**  This RFC-Proposal affects only the External Domain, resolving an inconsistency issue.  The implementation of this RFC-Proposal shall be examined at national level. This RFC-Proposal has no impact on business continuity and it should be possible to deploy it in a **flexible way**.  **Risk of not implementing the change:** The inconsistency in External Domain messages remains.  **Proposed** date of applicability in Operations (**T-Ops**):   As soon as possible, at latest when starting NCTS-P5 operations on the External Domain  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  February 2022  **Impact on transition**: None  **Risk of not implementing the change:**  Inconsistency for External Domain messages  **Impacted messages:**   * External Domain Messages: CC014C, CC022C, CC026C, CC051C and CC054C.   **Impacted R&C: -**  **Impacted CIs:**   * **CSE-v51.6.0: Yes;** * **DDNTA-5.14.1-v1.00 (Appendix Q2\_R\_C, K, PDFs): Yes;** * **DMP Package-5.6.0-SfA-v1.00 (incl. update of file Rules and Conditions\_v0.43): Yes;** * **NCTS\_TRP-5.8.1-v1.01: Yes;** * **NCTS\_CTP-5.8.1-v1.00: Yes;** * **CRP-5.5-v1.00: Yes;** * **ACS-5.5.0 & ACS-Annex-NCTS: 5.5.0: Yes;** * ieCA 1.0.1.0: No; * CS/MIS2\_DATA: No; * CS/RD2\_DATA: No; * UCC IA/DA Annex B: No; * Functional Specifications (FSS/BPM): No; * DDNTA-5.14.1-v1.00 (Main Document): No; * DDCOM v20.3.0-v1.00: No; * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No; * CTS-5.6.1-v1.00: 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, Q2\_R\_C, K** | |
| **DMP Package-5.6.0 SfA-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **NCTS- Data Mapping- v0.43 file on conversion resolution fields.** | |
| **NCTS\_TRP- 5.8.1** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of messages according to the updates of specifications.** | |
| **CRP-5.5-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **A new version of CRP will be published due to the updates of its components.** | |
| **CTP-5.8.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of scenarios according to the updates of specifications.** | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Likely low – To be assessed Nationally the impact on the specifications sent to Traders. | |

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 24/01/2022 | *Draft by CUSTDEV* |
| v1.00 | SfA to NPMs | 07/02/2022 | *Emergency RFC-Proposal as requested by NA-NL* |