

# CBP Air APIS Guide

System Identified Errors and Manifest Sufficiency Rates



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# **CBP Air APIS Guide**

## **CBP System Identified Errors and Manifest Sufficiency Rates**

Advance Passenger Information System (APIS) regulations require APIS manifests to be submitted to U.S. Customs and Border Protection (CBP) for all commercial aircraft arriving from or departing for a foreign port or place. In addition, APIS regulations require that electronic manifests relative to travelers (passengers and crew) be submitted within specific timeframes.

Compliant Air APIS manifest submissions are achieved through either of two submission methods: 1) Interactive and Non-interactive United Nations/Electronic Data Interchange for Administration, Commerce, and Trade (UN/EDIFACT) submissions, or 2) Non-interactive eAPIS submissions. eAPIS is a web portal enabling the user to create, manage, and submit APIS manifests. Air APIS submissions through UN/EDIFACT or the eAPIS web portal (<https://eapis.cbp.dhs.gov>) work to fulfill APIS reporting requirements.

### **How CBP Enforces APIS requirements:**

CBP enforces APIS 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 manifest and crew member manifest in a syntactically compliant message), timely (the manifest was submitted within the APIS 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), Air APIS penalty cases are assessed against the air carrier in the amount of \$5,000 for each infraction within a manifest. 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 (syntactic quality, record quantity), data element sufficiency (quality), as well as compliance with APIS regulation 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 aircraft (regardless of size) arriving from or departing for a foreign port or place, APIS manifests must be submitted to CBP.

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

Example:

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

Flight 2: 250 onboard/125 records transmitted = 50% onboard

The manifest for Flight 1 seems to be complete; the number of records submitted to CBP meets the number of travelers aboard.

The Flight 2 manifest, however, is incomplete and cannot attain a sufficiency rate higher than 50% (the manifest's completeness). Flight 2's manifest would be subject to an APIS penalty.

## **II. Manifest Timeliness**

### **For Arrivals into the United States:**

For all commercial aircraft (regardless of size) arriving from a foreign port or place, APIS manifests must be submitted to CBP within APIS regulation timelines.

**APIS Quick Query (AQQ) Interactive Option.** Passenger record data transmitted through a CBP-authorized interactive interchange system may be submitted up to the moment of the securing of the aircraft. A carrier employing one or both of the interactive transmission options (batch or AQQ) will transmit to the CBP system no later than 30 minutes after the securing of the aircraft, a message identifying passenger data for any passenger that checked in for the flight but was not boarded for any reason.

**APIS-30 Interactive Option.** Batch passenger record data transmitted through a CBP-authorized interactive interchange system must be submitted no later than 30 minutes prior to securing of the aircraft. A carrier employing one or both of the interactive transmission options (batch or AQQ) will transmit to the CBP system no later than 30 minutes after the securing of the aircraft, a message identifying passenger data for any passenger that checked in for the flight but was not boarded for any reason.

**APIS-30, Non-Interactive Batch Option.** Batch passenger manifests transmitted through non-interactive means must be submitted to the CBP system no later than 30 minutes prior to securing of the aircraft.

The electronic crew member and non-crew crew member arrival manifest must be transmitted no later than 60 minutes prior to departure. “Non-crew crew members” are normally cargo handlers aboard all-cargo flights.

The electronic passenger, crew member and non-crew crew member arrival manifests for flights diverted to the United States must be transmitted no later than 30 minutes prior to arrival.

The electronic passenger and crew member arrival manifests for an air ambulance in service of a medical emergency must be transmitted no later than 30 minutes prior to arrival.

## **For Departures from the United States:**

For all commercial aircraft (regardless of size) departing for a foreign port or place, APIS manifests must be submitted to CBP within APIS regulation timelines.

Electronic APIS Passenger manifests may be submitted to CBP via interactive connectivity to the CBP system or through a non-interactive batch submission. The timelines associated with these methods are described below:

**APIS Quick Query (AQQ) Interactive Option.** Passenger record data transmitted through a CBP-authorized interactive interchange system may be submitted up to the moment of the securing of the aircraft. A carrier employing one or both of the interactive transmission options (batch or AQQ) will transmit to the CBP system no later than 30 minutes after the securing of the aircraft, a message identifying passenger data for any passenger that checked in for the flight but was not boarded for any reason.

**APIS-30 Interactive Option.** Batch passenger record data transmitted through a CBP-authorized interactive interchange system must be submitted no later than 30 minutes prior to securing of the aircraft. A carrier employing one or both of the interactive transmission options (batch or AQQ) will transmit to the CBP system no later than 30 minutes after the securing of the aircraft, a message identifying passenger data for any passenger that checked in for the flight but was not boarded for any reason.

**APIS-30, Non-Interactive Batch Option.** Batch passenger manifests transmitted through non-interactive means must be submitted to the CBP system no later than 30 minutes prior to securing of the aircraft.

The electronic crew member and non-crew crew member departure manifest must be transmitted no later than 60 minutes prior to departure. “Non-crew crew members” are normally cargo handlers aboard all-cargo flights.

The electronic passenger and crew member departure manifests for an air ambulance in service of a medical emergency must be transmitted no later than 30 minutes after departure.

### III. Data Element Errors

This section will serve to describe data elements required by APIS regulations and how these elements are evaluated for sufficiency.

#### **Last Name**

**CBP Data Element Validation:** System Error if missing or invalid. Only alphabetic characters are allowed but inclusion of a hyphen or apostrophe is acceptable. Name elements should not include salutary suffixes or prefixes (Mr., Mrs. Jr., etc.).

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

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#### **First Name**

**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. Name elements should not include salutary suffixes or prefixes (Mr., Mrs. Jr., etc.).

Example:       \$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.

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## **Date of Birth**

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

Examples:

05-31-2002 (no error)

13-12-1970 (error, invalid month)

05-32-1970 (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.

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## **Traveler Status**

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

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## **Traveler Gender**

**CBP Data Element Validation:** System Error if missing or invalid. Only submissions of “M” for male and “F” for female are accepted.

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## **Country of Residence**

**CBP Data Element Validation:** System Error if missing or invalid. APIS regulations exempt all travelers on flights departing the United States from country of residence submissions.

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## **Country of Nationality/Citizenship**

**CBP Data Element Validation:** System Error if missing or invalid. The Nationality/Citizenship submission should reflect data contained within the MRZ of the traveler’s travel document.

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**Passenger Name Record (PNR):** 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.

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**Document Data** (when required) - The APIS submission must include a passport and/or Alien Registration Card (ARC) when either of these documents is required for travel by law and/or regulation. For APIS purposes, the travel document data required for entry into the United States is the same travel document data required for departure from the United States.

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

### 1) Document Type

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

### 2) Document Number

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

### 3) Passport Country of Issuance (when required)

**CBP Data Element Validation:** The value in this field should be the three-digit country code of 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 “USA”.)

**4) Document Expiration Date** (when required and available; i.e., a small group of passports may not have expiration dates)

**CBP Data Element Validation:** Numeric - System Error if syntactically invalid.

Examples (MM-DD-CCYY):

05-31-2012 (no error)

13-12-2012 (error, invalid month)

05-32-2012 (error, invalid day)

\*5-&5-2012 (error, invalid, illegal characters in month and date fields)

## **U.S. Destination Address**

APIS regulations exempt the following groups of travelers from U.S. destination address submission:

- U.S. citizens
- Lawful Permanent Residents (LPR)
- In-Transit Passengers\*
- Crewmembers
- Travelers on flights 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. In-Transit passengers should be indicated through traveler status data.

**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.)**

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#### **IV. How CBP Calculates APIS Manifest Sufficiency Rates:**

There are three components to sufficiency rate calculations:

**Onboard Count** – For flights, the onboard count is obtained from the entrance or clearance documentation presented by the carrier.

**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 single record.

	<b>Onboard Count</b>	<b>Records Transmitted</b>	<b>Missing Records</b>	<b>System Identified Errors</b>	<b>Sufficiency Rate</b>
<b>Flight 1</b>	100	100	0	0	100%
<b>Flight 2</b>	100	100	0	5	95%
<b>Flight 3</b>	100	50	-50	0	50%
<b>Flight 4</b>	100	50	-50	5	45%
<b>Flight 5</b>	100	0	-100	0	0%

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

Flight 1 – 100%, 0 missing, 0 invalid records

Flight 2 – 95%, 0 missing, 5 invalid records

Flight 3 – 50%, 50 missing, 0 invalid records

Flight 4 – 45%, 50 missing, 5 invalid records

Flight 5 – 0%, 100 missing, 0 invalid records

## **APIS Guide Updates:**

The most recent version of this guide can be found at [www.cbp.gov](http://www.cbp.gov).

## **Contact Information:**

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

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