



November 20, 2003

Mr. Denis Lefebvre  
Assistant Commissioner  
Customs Branch  
Canada Customs and Revenue Agency  
6<sup>th</sup> floor, Sir Richard Scott Bldg  
191 Laurier Avenue West  
Ottawa, ON K1A 0L5

Dear Mr. Lefebvre;

The CSCB has received your letter of November 7, 2003 denying our request that the payment period in December, 2003 be extended.

First, thank you for clarifying the basis for the decision to extend the payment period in February, 1999. The letter sent to us in November, 1998, made no mention of the K84 daily notice, but referred only to the “final bill” and the full two-day period granted by the Department at that time for brokers to reconcile, collect outstanding amounts and make payment.

Second, we agree that the situation in December 2003 is not the same as 1999 – but we would argue that an important reason for that is the significant increase in the use of GST letters by customs brokers and clients, and the corresponding increase in the number of cheques forwarded directly to CCRA. How many GST letters are in place today, and how many were in place five years ago? Will you provide us with the number of K23’s issued, by month, and by region, over that period?

Both the Canadian Society of Customs Brokers and I.E.Canada recognize the efforts made by customs brokers and their clients to manage the payment process in a responsible and efficient way. In December, the reconciliation and collection process is especially difficult due to the fact that many industries are closed over the holiday period, this year from December 19<sup>th</sup> through January 5<sup>th</sup>. What will happen in December when there is a short payment or when payment is not received?

The CSCB has met with your officials to discuss the implementation of electronic funds transfer options to facilitate the payment process. We are disappointed that this is not a CCRA priority at this time. In view of this, and in recognition of the business realities around the December payment process, the CSCB and I.E.Canada request that CCRA waive or mitigate AMPS penalties and interest due to late payment for importers who have direct payment arrangements in place through a GST letter or direct importer security.

We would appreciate the opportunity to discuss this further.

Yours sincerely

Carol West  
President  
Canadian Society of Customs Brokers

John Bescec  
Vice-President,  
International Trade and Government Relations  
I.E.Canada  
Canadian Association of Importers and Exporters