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**November 7, 2008 CLIENT ALERT: CBP UPDATE – “10+2”  
Final Rule (Importer Security Filing - “ISF”)**

We have learned that on 11/06/08, the Office of Management and Budget (“OMB”) completed its review of the U.S. Customs & Border Protection’s “10+2” Final Rule and has returned the Final Rule regulatory package to CBP for publication in the Federal Register. Publication of the Final Rule is expected to take place within the next few weeks and it is anticipated that there may be a Congressional review of the Final Rule prior to its publication. While the contents of the Final Rule regulation are not known at this juncture, we do not expect, absent Congressional action, that the rule will establish a prototype – however, we do anticipate that the Final Rule will provide for a delayed effective date and phased-in CBP enforcement period.

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***If you have any questions concerning the above CBP Update, or the potential impact these issues may have on your business, please contact Robert Pisani at (202) 466-0960 or Michael Roll at (310) 826-4410 or send an email to [info@worldtradelawyers.com](mailto:info@worldtradelawyers.com).***

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