



JFK AIRPORT CUSTOMS BROKERS &
FREIGHT FORWARDERS ASSOCIATION, INC.

10 East Merrick Road, Suite 305, Valley Stream, NY 11580 support@jfkbrokers.com (516)285-2170 x19

August 18, 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

Re: Public Comment on CES Application

Dear Mr. Quinones,

On behalf of the JFK Airport Customs Brokers and Freight Forwarders Association, we submit this letter in support of H&M International's application to operate as the Centralized Examination Station (CES) at Newark Liberty International Airport (EWR).

We endorse H&M International's proposal, particularly its commitment to maintaining the current CACEF per airwaybill (per/AWB) fee structure. This fee model is supported by the trade community, as it ensures costs are distributed fairly across shipments. Importantly, it prevents the disproportionate burden that results from a per-exam fee, which could lead to excessive costs for importers.

We respectfully request CBP to approve H&M International's CES application with the proposed per/AWB fee model. We believe this approach will best serve the needs of the trade community.

Thank you for your consideration of our comments. Please do not hesitate to contact us should you require additional information or perspective from our Association.

Sincerely,

Leslie Bresnaider

Leslie Bresnaider
President
JFK Airport Customs Brokers & Freight Forwarders Association



SAVINO DEL BENE®

Global Logistics and Forwarding Company

U.S.A. – New York
Savino Del Bene U.S.A. Inc.
230-59 Int'l Airport Center Blvd., Suite 260
Springfield Gardens, NY 11413
Tel: +1718-674-7995
e-mail: Leslie.Bresnaider@savinodelbene.com
www.savinodelbene.com

August 18, 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201

ATTN: David Quinones, Chief of Staff

Re: Public Comment on CES Application

Dear Mr. Quinones,

On behalf of Savino Del Bene USA Inc., we submit this letter in support of H&M International's application to operate as the Centralized Examination Station (CES) at Newark Liberty International Airport (EWR).

We endorse H&M International's proposal, particularly its commitment to maintaining the current CACEF per airwaybill (per/AWB) fee structure. This fee model is supported by the trade community, as it ensures costs are distributed fairly across shipments. Importantly, it prevents the disproportionate burden that results from a per-exam fee, which could lead to excessive costs for our importers.

For these reasons, we respectfully request CBP to approve H&M International's CES application with the proposed per/AWB fee model. We believe this approach will best serve the needs of Savino Del Bene.

Thank you for your consideration. Please do not hesitate to contact us should you require additional information.

Sincerely,

Massimiliano Gauna

Massimiliano Gauna
Chief Operating Officer
Savino Del Bene USA Inc



Express Customhouse Broker, Inc.

1010 Northern BLVD STE# 330, Great Neck, NY 11021
Ph. 516-466-3700 Fax. 516-466-3712
e-mail: all@expressCHB.com

C.H.B. LIC#: 27931
NATIONAL PERMIT#: 11-300

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

Date: August 18, 2025

Subject: Letter of Recommendation – CES at Newark Airport

Dear Mr. Quinones,

On behalf of Express Customhouse Broker, Inc., I am pleased to recommend H&M International Warehousing, Inc. in support of their bid to establish and operate a Centralized Examination Station (CES) at Newark Airport.

As a customs broker, we have worked with H&M International Transportation for MET examinations for over two decades, as well as with facilities such as East Coast Warehouse, SalSon Logistics, and Global Container Terminals. H&M's service has consistently stood out as the best marked by responsive staff, unmatched execution time, and genuine concern for the challenges faced by the trade community. These qualities are rare and make them exceptionally well-suited to operate as a Comprehensive Exam Site.

In addition, their rate per airway bill remains among the most competitive in the industry, delivering strong value to the trade community while ensuring timely and efficient cargo handling.

For these reasons, we fully support H&M's bid and believe they will serve as an excellent partner to CBP at Newark Airport.

Please feel free to contact me directly at (917) 330-5676 or tedkim@expresschb.com if you require additional information.

Thank you.

Sincerely,

Ted T. Kim / President
Express Customhouse Broker, Inc.

QUINONES, DAVID

From: Justin Casano <jdcasano@acpecommerce.com>
Sent: Tuesday, August 19, 2025 11:50 AM
To: QUINONES, DAVID
Cc: Ellen Zaleski; amangione@hmiw.net
Subject: EWR- Air CES

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from jdcasano@acpecommerce.com. [Learn why this is important](#)

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Good day Daniel,

Hope all is well

We are are contacting you in support of the current rate per MAWB structure rather than the per exam fee. In our experience as we ship consolidated shipments this has been positive and cost effective in the current structure. We feel a change can lead to excessive costs which would hurt our business into EWR port.

Thank you for considering my comments. Thanks

--

Thank you,

Justin Casano

Director Imports

ACP Aircitypost LLC

20 E Sunrise Highway STE 302 | Valley Stream NY 11581

Tel : 516-554 2378

jdcasano@acpecommerce.com

August 19, 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

Re: Public Comment on CES Application

Dear David Quinones,

On behalf of Spadaro International Services, we submit this letter in support of H&M International's application for a Centralized Examination Station at Newark Liberty International Airport (EWR).

We endorse H&M International's proposal, especially its commitment to maintaining the current airwaybill (per/AWB) fee structure. This model is supported by the trade community, as it makes sure costs are fairly distributed. It also prevents the burden that results from a per-exam fee, which could lead to excessive costs for our importers.

For these reasons, we would like to request CBP to approve H&M International's CES application with the proposed per/AWB fee model. We believe this approach will best serve the needs of everyone equally

We believe they will do a wonderful job same as they always do with all of our ocean shipments in the port of NY/NJ

Sincerely,

Michael Spadaro

Michael Spadaro

Integrated CHB, Inc.

175-01 Rockaway Blvd. Ste 301

Jamaica, NY 11434

Tel: 718-412-1054 Fax: 718-412-1049

Email: davep@integratedchb.com

Date: August 20, 2025

To: U.S. CUSTOMS AND BORDER PROTECTION

1210 CORBIN STREET

ELIZABETH, NJ 07201

ATTN: David Quinones, Chief of Staff

We hereby give full support and endorse H&M's bid for CES at Newark Liberty Airport and their rate per airway billing (AWB).

Thanks in advance for your assistance.

Best regards,

Dave Persaud

Integrated CHB Inc.

QUINONES, DAVID

From: James Lee <james.lee@shipallways.com>
Sent: Wednesday, August 20, 2025 4:10 PM
To: QUINONES, DAVID; amangione@hmiw.net
Subject: bid for Newark Airport CES

Follow Up Flag: Flag for follow up
Flag Status: Completed

You don't often get email from james.lee@shipallways.com. [Learn why this is important](#)

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Dear Assistant Port Director Quinones,

I am writing to endorse H&M to be the CES at Newark Airport.

Based on my experience, H&M has always provided excellent service and expertise.

I support their rate per airway bill and believe their nomination as the CES will be an asset to the trade community, as well as providing significant assistance to CBP in facilitating the exams. Thank you for your consideration.

James Lee
Customs Brokerage Manager

718-656-1200 Ext. 3117
161-15 Rockaway Blvd, Suite 300
Jamaica, NY 11434
shipallways.com





August 19th , 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

RE: Proposed New Rules: N.J.A.C. 12:11, Proposal Number PRN 2025-051

To Whom It May Concern,

The New York/New Jersey Foreign Freight Forwarders & Brokers Association, Inc. is one of the oldest transportation related organizations in the United States today. Founded in 1917, the association provides information on issues and developments important to its members; serves as a voice for the Freight Forwarding, Customs Brokerage and OTI communities in policy and regulation decision-making; and protects and advocates the best interests of the group as a whole.

The membership is made up of Ocean Transportation Intermediaries (Foreign Freight Forwarders and NVOCC's) licensed by the Federal Maritime Commission and Customs Brokers licensed by the Customs and Border Protection/Department of Homeland Security.

BACKGROUND:

On June 09, 2025, the Port of New York/Newark issued a Public Bulletin 23-015-NWK announcing that applications for operating a CES in EWR (Newark Liberty International Airport) would be accepted in accordance with the procedures set forth in 19 CFR § 118.2. The 60-day "Open Season" for submission of applications ended on August 8, 2025. Pursuant to 19 CFR § 118.12, the Port Director for the Port of New York/Newark is hereby advising the public of the applications received and inviting comments regarding the applications.

H&M International, who is the current CES under the CACEF setup, has officially filed for an application to be the designated CES of EWR. H&M has proposed maintaining the same per AWB rate structure that is currently being applied today through CACEF. This will ensure the same level of efficient service that they are currently performing for Trade.

Acting Port Director, Jeff Green, hosted a round table with trade back in Jan 2025 and there was an overwhelming turnout of support in favor of keeping the CACEF structure in place.

The NYNJFFFBA would like to support H&M's application. This entity has pioneered this service for decades and it only makes sense that they continue to do so.

Best Regards,

Al Raffa
President, NYNJFFFBA

Brauner International Corporation
66 York Street
Jersey City, NJ 07302
201-333-5400
www.braunerintl.com

Aug 21, 2025

U.S. Customs and
Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

RE: Proposed New Rules: N.J.A.C. 12:11, Proposal

Number PRN 2025-051

To Whom It May Concern,

BACKGROUND:

On June 09, 2025, the Port of New York/Newark issued a Public Bulletin 23-015-NWK announcing that applications for operating a CES in EWR (Newark Liberty International Airport) would be accepted in accordance with the procedures set forth in 19 CFR § 118.2. The 60-day "Open Season" for submission of applications ended on August 8, 2025. Pursuant to 19 CFR § 118.12, the Port Director for the Port of New York/Newark is hereby advising the public of the applications received and inviting comments regarding the applications.

H&M International, who is the current CES under the CACEF setup, has officially filed for an application to be the designated CES of EWR. H&M has proposed maintaining the same per AWB rate structure that is currently being applied today through CACEF. This will ensure the same level of efficient service that they are currently performing for Trade.

Acting Port Director, Jeff Green, hosted a round table with trade back in Jan 2025 and there was an overwhelming turnout of support in favor of keeping the CACEF structure in place.

Brauner International Corporation would like to support H&M's application. This entity has pioneered this service for decades and it only makes sense that they continue to do so.

Best Regards,


Brauner International Corporation



Tandem Global Logistics

1099 Wall St West, Suite 137
Lyndhurst, NJ 07071



Department of Customs and Border Protection
1210 Corbin St
Elizabeth, NJ 07201
Attention: Mr. David Quinones, Chief of Staff

August 22, 2025

RE: CACEF

Dear Mr. Quinones,

I am writing to express our position regarding the proposed changes to the Customs Air Cargo Examination Facility (CACEF) process at Newark Liberty International Airport (EWR).

The current examination system at EWR, operated by H&M International Warehousing Inc. at Building 157 on Conrad Road, functions seamlessly and efficiently. Under this system, each Master Airbill arriving at EWR is assessed with a flat fee of \$18.35, ensuring predictable costs for all stakeholders. Importantly, this structure allows importers to avoid additional examination charges, fostering transparency and cost-effectiveness in air cargo operations.

We understand that CBP is considering transitioning to a "pay-as-you-go" model, similar to systems in place at JFK and LAX. We strongly favor retaining the current model for the following reasons:

1. The "pay-as-you-go" model would impose significant charges. With this system average transaction fees per shipment selected for examination at JFK and LAX are \$650.
2. Examinations are performed in the interest of national security for the benefit of every U.S. citizen.

The current model in EWR recognizes this shared cost. Examination costs can quickly escalate for an individual importer. The punishing costs related to routine customs examinations should not have to be solely borne by any one importer.

3. This proposed change would undermine the operational efficiency and financial predictability currently enjoyed by importers and stakeholders at EWR.

The present system not only meets the operational needs of CBP but also supports the broader logistics community by ensuring examinations are conducted without undue financial burden. Altering this well functioning model risks introducing unnecessary complexities and costs, which could disrupt air cargo operations and place additional strain on the importer community. We are at a loss to understand what additional benefits would be gained from changing the current system.

We respectfully urge CBP to retain the current system, which has proven to be effective and equitable for all parties involved. We appreciate the opportunity to provide feedback



Tandem Global Logistics

1099 Wall St West, Suite 137
Lyndhurst, NJ 07071



and look forward to continuing our collaborative relationship to ensure the best outcomes for the EWR air cargo community.

Thank you for considering our comments. Should you require further details or wish to discuss our position, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Breck J. Benja".

Breck J. Benja
Branch Manger

QUINONES, DAVID

From: Vinny Vaiano <Vinny@mersant.com>
Sent: Friday, August 22, 2025 6:05 PM
To: LIAKAKOS, BASIL W; CIRILLO, LUCILLE; QUINONES, DAVID
Cc: Vaiano, Vincent
Subject: REGARDING PUBLIC COMMENTS FOR EWR CES / PIPELINE 25-022 8/11/2025

Importance: High

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Good evening/morning to all!

I am addressing all of you as "three people":

1. As a longstanding member of our Brokerage Community (2027 will mark 50 years in our industry);
2. As Past President of the JFK Customs Brokers & Freight Forwarders Association;
3. As Past Executive Director of the Long Island Import/Export Association.

In my humble (AND professional) opinion, one CES candidate clearly stands out, for the Newark Airport CES designation:

H & M INTERNATIONAL WAREHOUSING, for the following reasons:

1. Their service and experience serving our community operating the Newark CACEF (40+ years);
2. Their service and experience serving our community operating the Newark CES', since its inception (20+ years as I recall);
3. Their longstanding support of our CBP/Brokerage community's efforts to keep EWR and NY/NJ thriving and moving. I am certain they will perform the same functions with limited interruption in cargo flow.
4. H & M's reputation in our industry and support of our community is second to NONE.

Thank you for allowing our community to have our say, prior to your final decision on who will be EWR's CES.

Respectfully submitted,

VINCENT VAIANO, VICE PRESIDENT, LCB, CCS
MERSANT INTERNATIONAL LTD
10 FIFTH STREET, SUITE 302
VALLEY STREAM, NY 11581
PHONE 718-978-8200 EXT 3029
DIRECT LINE 347-632-3029
CELL PHONE 917-930-0882
EMAIL VINNY@MERSANT.COM

Disclaimer: Suggested tariff classifications are based upon the commodity description provided. As the importer of record, you are legally responsible for the correct tariff

QUINONES, DAVID

From: Vinny Vaiano <Vinny@mersant.com>
Sent: Friday, August 29, 2025 6:12 PM
To: LIAKAKOS, BASIL W; CIRILLO, LUCILLE; QUINONES, DAVID
Cc: Daniel Caldera; Vaiano, Vincent
Subject: Re: REGARDING PUBLIC COMMENTS FOR EWR CES / PIPELINE 25-022 8/11/2025

Follow Up Flag: Follow up
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 [PAGES 4 AND 5 OF H AND M CES PROPOSAL.pdf](#)

Good day to all!

Further to my email of August 22, 2025 (below), I had forgotten to mention that I believe H & M's rate proposal to be acceptable and eminently fair.

We are in support of the current fee structure as proposed. the accessorial fee per MAWB has not only worked over the years with the CACEF, but also because it:

- A) helps our community at large and
- B) is the fairest way to administer the exam fees.

We look forward to H & M becoming the Newark Airport CES in due time.

Thank you for your consideration in this matter.

Respectfully submitted,

VINCENT VAIANO, VICE PRESIDENT, LCB, CCS
MERSANT INTERNATIONAL LTD
10 FIFTH STREET, SUITE 302
VALLEY STREAM, NY 11581
PHONE 718-978-8200 EXT 3029
DIRECT LINE 347-632-3029
CELL PHONE 917-930-0882
EMAIL VINNY@MERSANT.COM

Disclaimer: Suggested tariff classifications are based upon the commodity description provided. As the importer of record, you are legally responsible for the correct tariff classification of your goods as per 19 U.S. Code § 1484. This applies even if you employ a Customs broker to handle your customs entries on your behalf.

SALVATORE DISTEFANO DBA
RELIANCE CUSTOMS BROKERAGE

AIR & OCEAN IMPORT-EXPORT-BROKERAGE

102 West End Avenue

Inwood NY 11096

516-887-2400

516- 887-8092 FAX

516-706-5585 FAX

Gabriella@reliancecustoms.com

www.reliancecustoms.com

August 25th, 2025

U.S. Customs and Border Protection
1210 Corbin Street Elizabeth, NJ 07201

ATTN: David Quinones, Chief of Staff

I, Gabriella Matranga C/O Salvatore Distefano DBA Reliance Customs Brokerage, am writing on behalf of H&M CES. This is our endorsement letter for Bid for H&M CES at Newark Airport and their advantages of rate per airway bill. The rate per airway bill has been working for years and it is great for the community. We feel this will be beneficial for all.

If you have any questions, please feel free to contact me.

Best Regards

Gabriella Matranga

MERIDIAN CUSTOMS BROKERS, INC.
159 DOUGHT BLVD, Unit 1B
Inwood, NY 11096
718-949-4100

August 18, 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201

ATTN: David Quinones, Chief of Staff

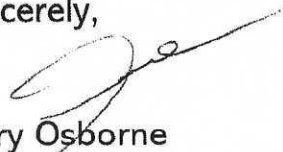
Re: Public Comment on CES Application

Dear Mr. Quinones,

On behalf of Meridian Customs Brokers we submit this letter in support of H&M International's application to operate as the Centralized Examination Station (CES) at Newark Liberty International Airport (EWR).

We endorse H&M International's proposal, particularly its commitment to maintaining the current CACEF per airwaybill (per/AWB) fee structure.

Sincerely,



Gary Osborne
Meridian Customs Brokers



B&H Customs Services Inc.

147-19 SPRINGFIELD LANE #A JAMAICA, NY 11413 Tel 718-525-7050 Fax 718-525-7060

Subj : Notice of CES Applications Received for the Newark Liberty International Airport (EWR) and Invitation to Submit Comments

Date : 8/19/2025

REFERENCES: 19 C.F.R. 118 § 19 C.F.R. § 151.1-7, 15; NWK Informational Pipeline No. 25-015-NWK (Announcement of Centralized Examination Station (CES) Application Period and Selection Process for EWR International Airport- dated June 9, 2025)

To Port Director Thomas,

I am writing on behalf of H&M International Warehousing and the CES operations at Newark Liberty Airport (EWR). I would like to first off commend H&M International Warehousing for their continued investment into the trade community and their leadership as a trusted CES at the Port of Newark. Regarding the operations and proposed fee scheduling procedures, we believe having a service fee per airway bill arriving at Newark Airport would be best for the trade community to ease the burden on the importers that will ultimately have their freight examined. It would be cost prohibited especially for lower valued freight to have to account for the unexpected exam fees.

Sincerely,

Timothy Park

President

B&H Customs Services Inc.

PROFFREIGHT

35A Brunswick Ave, Edison, NJ 08817

To: U.S. Customs and Border Protection
1210 Corbin Street Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

Re: H&M Intl warehousing CES Application

Dear Officer,

We have worked with H&M Warehousing CES for ocean shipments for long periods of time. We have found their staff are very knowledgeable & responsive. We have reviewed their pricing schedules and we think the rates are reasonable.

We recommend H&M Warehousing to be a Centralized Exam Site at EWR Airport.

Thank you,



Raymond Wong, Import Manager

Tel 732-486-1104

raymond@proffreight.us



MM Superior Freight

WORLDWIDE LOGISTICS SOLUTIONS

MM SUPERIOR FREIGHT INC.
20 Commerce Drive, Suite 211 - Cranford, NJ 07016 USA
FMC 032721NF

August 28, 2025

US Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

RE: Proposed New Rules: N.J.A.C. 12:11, Proposal Number PRN 2025-051

Dear Officer Quinones:

On June 09, 2025, the Port of New York/Newark issued a Public Bulletin 23-015-NWK announcing that applications for operating a CES in EWR (Newark Liberty Airport) would be accepted in accordance with the procedures set forth in 19 CFR § 118.2. The 60-Day "Open Season" for submission of applications ended on August 8, 2025. Pursuant to 19 CFR § 118.12, the Port Director for the Port of New York/Newark has advised the public of the applications received and has invited comments regarding the applications.

In January 2025, Acting Port Director, Jeff Green, hosted a round table with trade discussing the CACEF structure. As an attendee of this meeting, it was very clear that there was an overwhelming consensus in support of the CACEF operational configuration, including the per AWB fee structure currently being applied.

H&M International, who is the current CES under the CACEF setup, has officially filed an application to be the designated CES of EWR. H&M has proposed maintaining the same per AWB rate structure that is currently being applied today through the CACEF.

This method has kept freight & commerce via airfreight moving smoothly through the customs examination process, making Newark Liberty International Airport the most seamlessly efficient port for customs examinations.

As a partner in trade, and on behalf of our import clients, we are in full support of H&M being awarded this nomination and for maintaining the current structure of per AWB rate that has been in place to date.

Kindest regards,

Elizabeth Magistro, LCB
VP Operations
+ 732-620-4371

lm@mmsuperiorfreight.com

QUINONES, DAVID

From: Vinny Vaiano <Vinny@mersant.com>
Sent: Friday, August 29, 2025 6:12 PM
To: LIAKAKOS, BASIL W; CIRILLO, LUCILLE; QUINONES, DAVID
Cc: Daniel Caldera; Vaiano, Vincent
Subject: Re: REGARDING PUBLIC COMMENTS FOR EWR CES / PIPELINE 25-022 8/11/2025

Follow Up Flag: Follow up
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 [PAGES 4 AND 5 OF H AND M CES PROPOSAL.pdf](#)

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We are in support of the current fee structure as proposed. the accessorial fee per MAWB has not only worked over the years with the CACEF, but also because it:

- A) helps our community at large and
- B) is the fairest was to administer the exam fees.

We look forward to H & M becoming the Newark Airport CES in due time.

Thank you for your consideration in this matter.

Respectfully submitted,

VINCENT VAIANO, VICE PRESIDENT, LCB, CCS
MERSANT INTERNATIONAL LTD
10 FIFTH STREET, SUITE 302
VALLEY STREAM, NY 11581
PHONE 718-978-8200 EXT 3029
DIRECT LINE 347-632-3029
CELL PHONE 917-930-0882
EMAIL VINNY@MERSANT.COM

Disclaimer: Suggested tariff classifications are based upon the commodity description provided. As the importer of record, you are legally responsible for the correct tariff classification of your goods as per 19 U.S. Code § 1484. This applies even if you employ a Customs broker to handle your customs entries on your behalf.



August 21, 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

RE: Proposed New Rules: N.J.A.C. 12:11, Proposal Number PRN 2025-051

To Whom It May Concern,

BACKGROUND:

On June 09, 2025, the Port of New York/Newark issued a Public Bulletin 23-015-NWK announcing that applications for operating a CES in EWR (Newark Liberty International Airport) would be accepted in accordance with the procedures set forth in 19 CFR § 118.2. The 60-day "Open Season" for submission of applications ended on August 8, 2025. Pursuant to 19 CFR § 118.12, the Port Director for the Port of New York/Newark is hereby advising the public of the applications received and inviting comments regarding the applications.

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Acting Port Director, Jeff Green, hosted a round table with trade back in Jan 2025 and there was an overwhelming turnout of support in favor of keeping the CACEF structure in place. I was happy to represent our industry at this meeting.

On behalf of William B Skinner Inc, I would like to support H&M's application. I would like to support their rate structure where the costs of examinations are spread out among the airwaybills that arrive in Newark at a very nominal fee. This fee structure is much better than the pay as you go model where an exam could cost upwards of \$1000.

H&M has pioneered this service for decades and it only makes sense that they continue to do so.

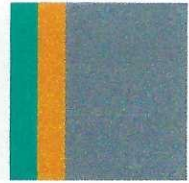
Best Regards,


William B Skinner III
President

H.W.ROBINSON & CO.,INC.

194 HEMPSTEAD AVE,LYNBROOK, NY 11563

T:718-723-500 | FAX: 718-723-5370 | traffic@hwrobinson.com



September 5, 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 0201

ATTN: David Quinones, Chief of Staff

RE: Proposed New Rules: N.J.A.C. 12:11, Proposal Number PRN 2025-051

To Whom It May Concern,

H & M International Transportation, Inc CES has been H.W. Robinson & Co., Inc. preferred choice for CES facility for US Customs and Border Protection examinations since 2012.

H & M Intl CES fully utilizes their facility to assist US Customs and Border Protection with control and accountability of merchandise imported into the United States.

We feel confident H&M Intl CES will extend the same practice to a Central Exam Site dedicated to handling Examinations on Air Shipments.

When it comes to customer care and follow up communications, H & M Intl has assisted with transferring containers which require NII/Vacis Examination, CET, TET and ACTE timely and effectively.

Their knowledge and expertise with operations makes for smooth examinations without delay, we can only expect the same level of service on Air Shipment Examinations.

H.W. Robinson & Co., Inc is a 5 Generation, Family owned and operated Licensed Customs Brokerage firm since 1920. We have worked with many CES throughout the US for Remote Filing; H&M is a leader in the industry.

It is with great honor and respect that HWR would like to recommend H&M Intl CES to expand their services, knowledge and expertise to the NY/NJ Community by handling Air Cargo Exams.

Thank you for your time and kind attention to our recommendation.

Sincerely,

Raffaella Maloney

President

H.W. Robinson & Co., Inc.

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NYC Supply Chain Solutions Inc.
99 Tulip Ave, Ste 405
Floral Park, NY 11001
718-276-1688

September 8, 2025

U.S. Customs and Border Protection
1210 Corbin Street
Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

RE: Proposed New Rules: N.J.A.C. 12:11, Proposal Number PRN 2025-051

To Whom It May Concern,

BACKGROUND:

On June 09, 2025, the Port of New York/Newark issued a Public Bulletin 23-015-NWK announcing that applications for operating a CES in EWR (Newark Liberty International Airport) would be accepted in accordance with the procedures set forth in 19 CFR § 118.12, the Port Director for the Port of New York/Newark is hereby advising the public of the applications received and inviting comments regarding the applications.

H&M International, who is the current CES under the CACEF setup, has officially filed for an application to be the designated CES of EWR. H&M has proposed maintaining the same per AWB rate structure that is currently being applied today through CACEF. This will ensure the same level of efficient service that they are currently performing for Trade.

On behalf of NYC Supply Chain Solutions Inc. I would like to support H&M's application. I would like to support their rate structure where the costs of examinations are spread out among the airway bills that arrive in Newark at a very nominal fee. This fee structure is much better than the pay as you go model where an exam could cost upwards of \$1000.

H&M has pioneered this service for decades and it only makes sense that they continue to do so.

Sincerely,

Michael Yan
President



QUINONES, DAVID

From: CIRILLO, LUCILLE
Sent: Monday, September 8, 2025 3:50 PM
To: QUINONES, DAVID
Subject: FW: Endorsement for H & M International Warehousing

Follow Up Flag: Follow up
Flag Status: Completed

FYSA

Lucille Cirillo
Deputy Chief
Port of New York/Newark
U.S. Customs and Border Protection
Office (201) 443-0338
Cell (973) 390-0747

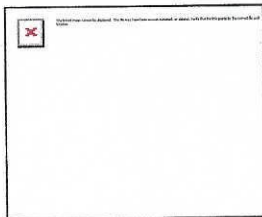
From: Veronica Grippi <vgrippi@pegasusmaritime.com>
Sent: Monday, September 8, 2025 3:49 PM
To: LIAKAKOS, BASIL W <BASIL.W.LIAKAKOS@CBP.DHS.GOV>; CIRILLO, LUCILLE <LUCILLE.CIRILLO@CBP.DHS.gov>
Subject: Endorsement for H & M International Warehousing

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Dear CBP,

We strongly support the application of H & M International Warehousing to serve as a U.S. Customs Examination Site at Newark Liberty International Airport.
Please confirm you can accept this email as an official endorsement for them



Veronica Grippi, LCB
Director of Operations
Phone 212-840-6969 ext 121 Mobile 646-732-7899
Email vgrippi@pegasusmaritime.com
250 West 39th Street, Suite 602, New York, NY 10018

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Global Logistics Providers

September 8, 2025

U.S. Customs and Border Protection
1210 Corbin Street Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

RE: Proposed New Rules: N.J.A.C. 12:11, Proposal Number PRN 2025-05

To Whom It May Concern,

J.W. Allen is a customs broker/freight forwarder in operation since 1932. The Vice President of its East Coast Operations has worked in the Port of Newark/New York since 1995. She has served in various positions within the New York/New Jersey Foreign Freight Forwarders and Brokers Assn, including four years as its president.

BACKGROUND: On June 09, 2025, the Port of New York/Newark issued a Public Bulletin 23-015-NWK announcing that applications for operating a CES in EWR (Newark Liberty International Airport) would be accepted in accordance with the procedures set forth in 19 CFR § 118.2. The 60-day "Open Season" for submission of applications ended on August 8, 2025. Pursuant to 19 CFR § 118.12, the Port Director for the Port of New York/Newark is hereby advising the public of the applications received and inviting comments regarding the applications.

H&M International, who is the current CES under the CACEF setup, has officially filed for an application to be the designated CES of EWR. H&M has proposed maintaining the same per AWB rate structure that is currently being applied today through CACEF. This will ensure the same level of efficient service that they are currently performing for the air cargo community.

J. W. Allen favors keeping the current CACEF AWB rate schedule as proposed by H & M. This fee regime has been a successful rate structure for a considerable time that has resulted in an efficient and effective handling of examinations of air cargo at the Newark Liberty Airport.

Sincerely,

Charlene Riley
Vice President, East Coast Operations

International Air & Ocean Freight Forwarders & Licensed Customs Brokers

Intl Freight Forwarder FMC License No. 067NF

Custom Broker Treasury Dept. License No. 10155

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Saint Rose, LA 70087

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QUINONES, DAVID

From: Albert Cohen <albert@mutualforwarding.com>
Sent: Tuesday, September 9, 2025 9:38 AM
To: QUINONES, DAVID
Cc: amangione@hmiw.net
Subject: Letter of recommendation for H&M

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Good morning Mr. Quinones,

Regarding the PONY/NWK Public Bulletin 23-015-NWK announcement that applications to operate a CES at Newark's Liberty International Airport would be accepted, in accordance with procedures set forth in 19 CFR Paragraph 118.2, and the invitation of comments by the port director referencing applications to operate said CES.

Please allow me to submit that I support the application of H&M International to operate such a new CES. H&M have operated similar facilities for many, many years at the Elizabeth/Newark port, and I believe that they are uniquely positioned for such an endeavor based on their very successful past experience and history of dedicated work ethic, integrity, and reasonable charges to their customers.

Additionally, to the best of my knowledge, H&M have offered to keep the same AWB rates currently applied through the Centralized air cargo exam facility (CACEF). This would ensure assessing reasonable and fair fees being spread between all AWB's arriving at EWR.

Thank you for a positive consideration,

Sincerely,

Albert Cohen - President
Mutual International Forwarding Inc.
560 Sylvan Avenue - Suite 3195
Englewood Cliffs NJ 07632
Tel: (212) 725-3804
Cell: (917) 685-0697
E-mail: albert@mutualforwarding.com
Our 56th Year in Business – Founded 31 March 1969

Formerly at 1 WTC, Suite 8967, NY NY 10048 – June 1, 1971 to Sept. 11, 2001



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Comet Customs Brokers, Inc.

193 E Merrick Rd. Valley Stream, NY 11580 (516)861-2169

09/09/2025

U.S. Customs and Border Protection
1210 Corbin Street Elizabeth, NJ 07201
ATTN: David Quinones, Chief of Staff

Re: Endorsement of H&M, bid for CES at Newark airport

Dear Chief Quinones,

I am sending this letter as my endorsement of H&M as CES at Newark Airport.

I have been working with H&M for over 40 years and have found them to always be diligent in handling of Customs matters.

They would be an excellent choice to run the Newark CES.

Thank You

Regards,

Sam Focarino 
Certified Master Lic. CHB, CCB, LCB

Comet Customs Brokers, Inc.

193 East Merrick Rd
Valley Stream, NY 11580

tel. (516)861-2169

fax. (516)861-2171





VIA E-MAIL

September 9, 2025

U.S. Customs and Border Protection
Attn: David Quinones, Chief of Staff
1210 Corbin Street
Elizabeth, NJ 07201

Dear Mr. Quinones:

On behalf of United Airlines (United), we respectfully submit comments in opposition to the fee schedule proposed in the CES application submitted by H&M International Warehousing (H&M) for Newark Liberty International Airport (EWR). The fee schedule proposed by H&M is impermissibly vague, purports to apply to all master air waybills (MAWB) that touch EWR despite not providing any services for those shipments, includes in-transit shipments that are not inspected at EWR, and charges fees to air carriers rather than importers as required by regulation.

1. Non-Compliance with 19 CFR § 118.4(c)

Section 118.4 requires that CES operators, “[a]ssess service fees as outlined in the fee schedule included in the approved application [...] and bill users directly for services rendered.” H&M’s application does not provide such a schedule. Instead, it proposes to assess a fee for every MAWB bound for or transiting through EWR, purporting to cover “all costs related to examination services,” and an “inclusive price per Air Waybill for all international cargoes into Newark Liberty International Airport.”

This proposed fee arrangement does not identify specific services, fees, charges, or cost structures, and therefore fails to meet the transparency requirements of § 118.4(c). A per-MAWB fee inappropriately places additional costs on air carriers regardless of whether shipments are actually selected by CBP for inspection. Furthermore, H&M impermissibly proposes to assess a per-MAWB fee for in-transit shipments that are generally inspected at the destination, not at EWR. A blanket fee covering all in transit shipments unfairly burdens carriers with a larger volume of transfer shipments through EWR, such as United.

2. Non-Compliance with 19 CFR § 118.11(c)

H&M’s application cannot be considered because it has not provided all the specified information required by 19 CFR § 118.11(c). Section 118.11 requires that CES fees be fair, equitable, and not exceed the cost of services rendered. Specifically, section 118.11(c) states that each application to operate a CES shall consist of, “[a] schedule of fees clearly showing what the applicant will charge for each type of service.” H&M has not provided a schedule of fees for each type of service in its application to operate a CES at EWR, rather it proposes an opaque structure making it impossible to identify the charge for each type of service. H&M’s proposed blanket “inclusive price per Air Waybill” does not specify what the charge will be for each type of service, but attempts to impose charges on every single MAWB, even when no service has been provided at all. This proposal would result in a structure where fees are

completely untethered from the cost of the services provided by H&M and where the true costs are obscured from the users being billed.

Furthermore, H&M submitted two separate proposed fee structures in its applications to operate a CES at John F. Kennedy International Airport (JFK) in September 2023. In its applications at JFK, H&M was willing and able to provide a detailed schedule of fees for each type of service in one of its two proposals—its second proposed fee schedule included a per-MAWB fee like it has proposed at EWR. The CBP rejected both of H&M's proposals in favor of another operator that provided a clear schedule of fees for each type of service.

3. Improper Burden on Airlines and Ground Handlers

By designating the originating airline or ground handler as the billed party, the application imposes compliance-related costs onto entities that are not legally responsible for them. This approach also deviates from industry practices at other CESs across the country where importers are billed when their shipments are selected for examination rather than placing an undue financial burden on air carriers by applying a fee to each and every MAWB they carry through an airport.

The preamble to the Final Rule authorizing the creation of CESs states that:

The services which the CES operator renders are for the benefit of the importer (who is required under law to make the imported merchandise available to Customs for inspection) and involve the storage of the merchandise under bond and with liability insurance, opening the container in which the merchandise is packed, presenting the merchandise to the Customs inspector for examination, and closing the container after examination.

58 FR 5596, <https://www.federalregister.gov/citation/58-FR-5604>.

The Final Rule goes on to state that, “under a long-standing principal established in an opinion of the Attorney General (35 O.A.G. 431 (1928)) and reflected in §§ 151.6 and 151.7 of the customs regulations, the expenses incurred in making merchandise available to Customs for purposes of examination are to be borne by the importer.” *Id.* at 5601. “The legal responsibility of importers to cover expenses in connection with the examination of merchandise is based on the legal authority totally separate from the user fee statute (19 USC 58c) and the importer’s payment of a fee to a CES operator for his services is nothing more than an alternative means for the importer to carry out that legal responsibility.” *Id.* “[...] under the basic CES operating principle the CES operator renders services on behalf of the importer rather than for the benefit of the carrier[.]” *Id.* at 5602.

Therefore, in order to be considered, H&M must submit a fee schedule for public comment that specifies fees for services rendered to the importer of a shipment that has been selected for screening rather than its proposed blanket fee for each MAWB charged to air carriers.

4. Risk of Unreasonable and Anti-Competitive Practices

As the sole applicant for CES operations at EWR, H&M’s opaque and overreaching fee structure threatens unfair pricing, promotes cost inflation, and creates animosity among the CES operator, carriers, handlers, and importers. Such practices directly contradict CBP’s stated objective of promoting efficient, equitable, and secure CES operations, jeopardizing the integrity and fairness of the system.

5. Concerns Over Proprietary Information

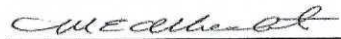
The proposed CES application raises significant concerns regarding the unclear handling and sharing of proprietary information between CBP and the third-party CES applicant, H&M. United's proprietary data, which includes sensitive operational and logistical details, must be safeguarded against unauthorized access or misuse. The lack of transparency regarding how H&M intends to gather, manage, and protect this proprietary information in order to charge air carriers on a per-MAWB basis poses a serious risk to data security and confidentiality, and potentially compromises United's security and proprietary information. Because of these concerns, United would not provide information regarding every MAWB to the CES operator unless mandated to do so by CBP.

Conclusion

For the reasons stated above, we respectfully urge CBP to reject H&M International Warehousing's CES application unless it revises the proposed fee structure to comply with the regulations and to be in alignment with CESs at other locations. The proposal fails to comply with the specific requirements of 19 CFR §§ 118.4(c) and 118.11(c), and does not provide the transparency, fairness, or accountability necessary for CES operations.

Thank you for considering these comments and for your commitment to finding a fair and equitable solution for the EWR trade community.

Sincerely,



Mark Albrecht
Managing Director - Cargo Logistics, Compliance & Cost
United Airlines