THE CARMICHAEL COMPASS

"WHEN THE TIDES OF TRADE SHIFT, WE'RE YOUR COMPASS."

SPECIAL MEMO

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CBP is Sending Notices of Voiding Importer of Record Numbers

Recently, Carmichael has started receiving copies of notices from U.S. Customs and Border Protection (CBP) notifying importers that their Importer of Record number may be voided, effective November 18, 2026, unless they take further action to update importer business information that is not up to date with CBP.

In the notice, CBP directs the importer to review their CBP Form 5106 information in the ACE Secure Data Portal and make any necessary corrections to their company's information. In addition, importers who participate in the Customs Trade Partnership Against Terrorism (C-TPAT) program should verify that all their correction Importer of Record numbers are listed in the CTPAT portal for their account.

Information Subject to Verification

CBP is emphasizing the accuracy and ownership of key data elements, including:

- Importer name
- EIN, SSN, or CBP-assigned number
- Physical address
- Mailing address
- Email address
- Phone number

All information must be accurate, complete, and directly associated with the importer.

Specific Compliance Expectations

CBP highlights several areas of concern:

- Physical Address:
  Must reflect the importer's actual business or individual location. Customs Brokers, freight forwarders, registered agents, business service centers, P.O. boxes, or other third-party addresses are not acceptable as the importer's physical address.
- Email Address:
  Must belong to the importer. Brokers and other third parties may not substitute their own email addresses.
- Phone Number:
  Must belong to the importer and not to a broker, forwarder, or other third party.

Key Takeaways

If CBP determines that information submitted on a CBP Form 5106 is inaccurate, incomplete, or misleading, it may immediately void the IOR number, preventing the importer from entering merchandise into the United States. CBP may also pursue additional enforcement actions.

The review applies to both new and existing importers of record and includes information submitted directly by importers or through Customs Brokers.

Contact your local Carmichael representative if you believe your company's information may not be up to date with CBP.



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