

arrival. A more flexible entry screen that allows for updates and amendments to some notice information would reduce the likelihood that the original notice would have to be resubmitted by importers, thus lessening the time burden, and therefore the costs of prior notice. Even a 1 hour amendment and updates to prior notice would provide some flexibility for importers in industries where certain information, such as the type of the product being imported and the quantity of the article to be imported, may change or is not known until just before shipping.

It is also important to note here that we assume that the 1 hour time FDA has estimated that it takes to fill out each prior notice is sufficient for this option, even with the opportunity of amending prior notice information. This time is sufficient because amending or updating a particular item in the prior notice

submission should only take a few seconds to a few minutes in time.

If prior notice can be amended and updated, fewer resubmissions would occur. For this option, then, with amendment and updates, we will assume that the number of prior notice resubmissions necessitated by changes in information on the notice would be reduced from 20 percent (as in option 4) to 2.5 percent. FDA believes that the resubmission rate for a 4-hour prior notice time with 1-hour amendment will result in about the same resubmission rate as option 2 (a straight, 1 hour before arrival, prior notice timeframe). FDA believes these two timeframes will cause about the same resubmission rate, because both arrival timeframes are relatively short and both are within the timeframe of 4 hours that was suggested by Canadian and Mexican perishable products importers.

Compared with option 4 (4 hours prior notice with no amendments or updates), option 7 would save 4 hours wait time per prior notice submission that can be amended or updated. Prior notice submissions that cannot be amended or updated, however, would lead to waits of 4 hours. Those 2.5 percent of shipments for which prior notice cannot be amended or updated would wait an extra 4 hours before being able to cross the border. This wait translates into 2.4 percent of the perishable produce life span (4 hours out of 168 hours) and 8.3 percent of the perishable seafood life span (4 hours out of 48 hours). Table 26 of this document shows the costs of submitting prior notice for a 4-hour minimum time before arrival, with a 1-hour timeframe before arrival for submitting amendment and updates, for Canadian, Mexican, and Central American perishable produce and seafood.

Table 26.--Loss in Value Caused by Resubmitted Prior Notice Under Option 7

Perishable Produce	Dollars
2001 Imported Mexican produce total retail value	\$3,458,525,000
2.4% Reduction in value for 2.5% of Mexican produce	\$2,075,115
2001 Imported Canadian produce total retail value	\$401,826,000
2.4% Reduction in value for 2.5% of Canadian produce	\$241,096
2001 Imported Central American produce total retail value	\$217,420,000
2.4% Reduction in value for 2.5% of Central American produce	\$130,452
Total Lost Value for Produce	\$2,446,000
Perishable Seafood	
2001 Imported Mexican seafood total retail value	\$112,277,406
8.3% Reduction in value for 2.5% of Mexican seafood	\$232,976
2001 Imported Canadian seafood total retail value	\$1,863,217,894
8.3% Reduction in value for 2.5% of Canadian seafood	\$3,866,177
2001 Imported Central American seafood total retail value	\$251,796,496
8.3% Reduction in value for 2.5% of Central American seafood	\$522,478
Total Lost Value for Seafood	\$4,621,000

Table 27 of this document compares the reduction in the costs of this interim

final rule if amendments and updates to prior notice are allowed (option 7), as

opposed to the no-amendment 4-hour option 4.