



KYG TradeTM
Know Your Goods

KYG Trade Master Class

Advanced Topics in Customs Compliance

February 2025

U.S. Patent # 17/512,223 Notice of Allowance Received

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Today's Topics

AI “Assisted”...



1) Data Detection and Accuracy

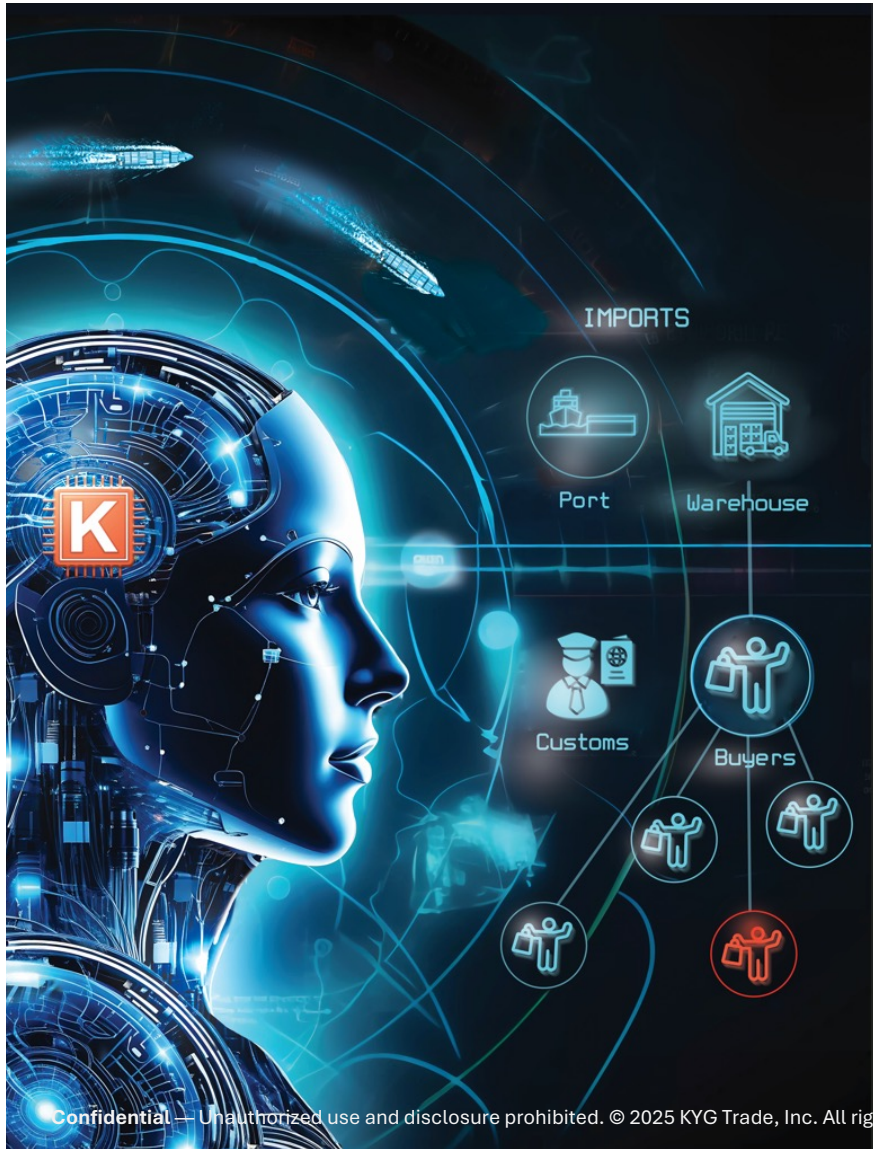
2) Classification

3) Non-Preferential/Preferential Origin & UFLPA Compliance

4) Additional Configurations & Data Storage



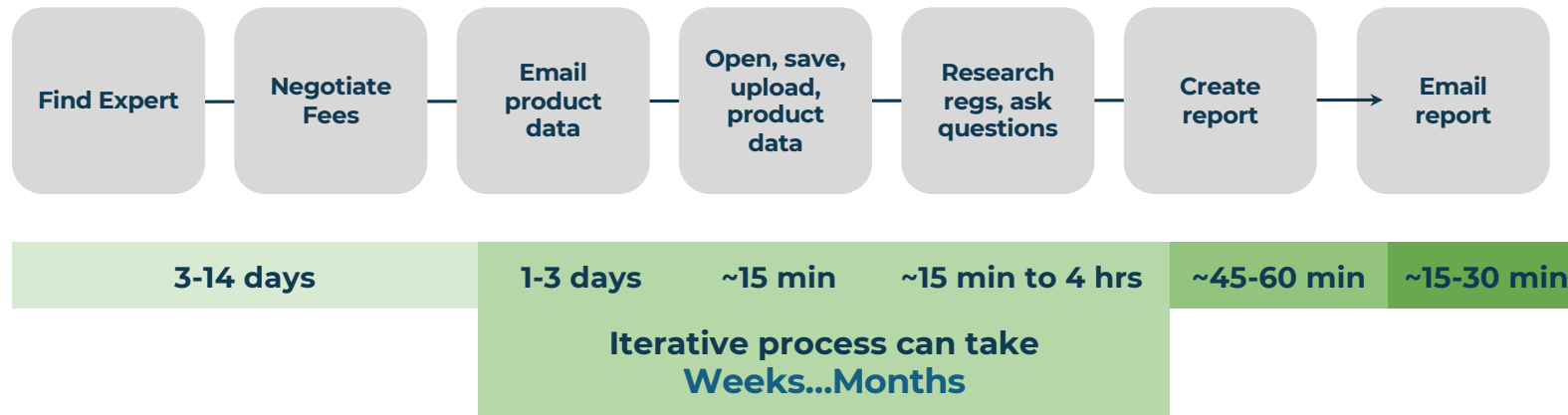
Data Detection and Accuracy





Current state

“Help! My shipment was flagged and detained for forced labor risk. I have 30 days to rebut the presumption and submit a detention notice response to customs.”

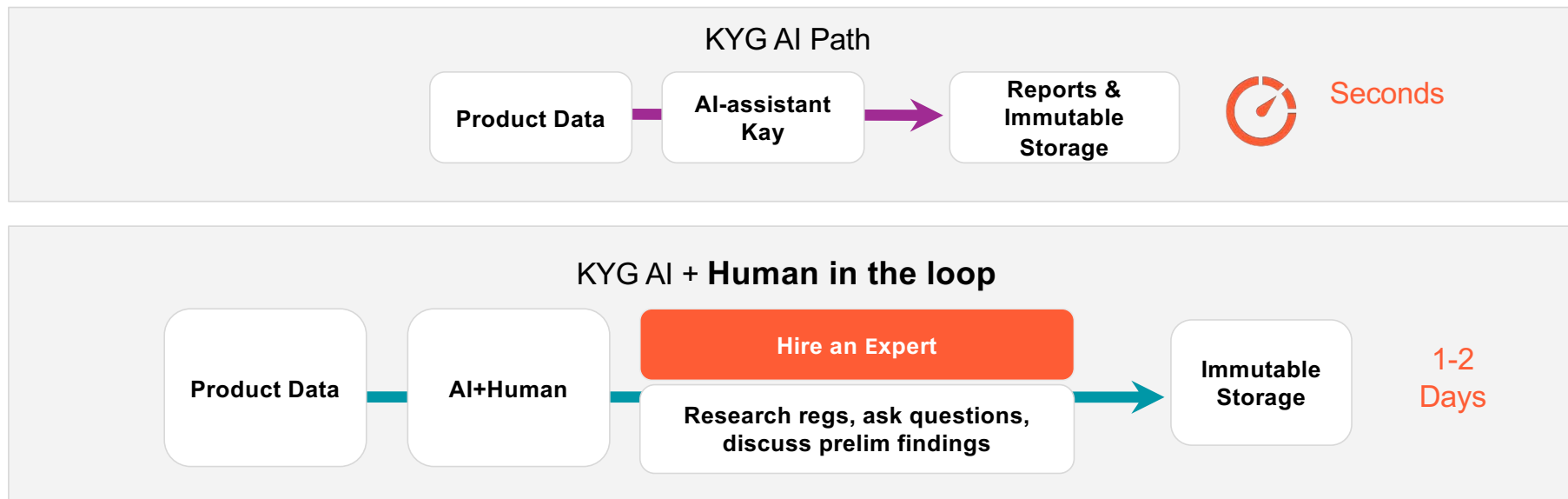


KYG Trade can do this at scale within seconds at a fraction of the cost.



The future is now

Forced Labor, Traceability, Sanctions, Toxic Substances, ESG, HTS, Export Controls, FTAs, Tier-N Mapping, others...

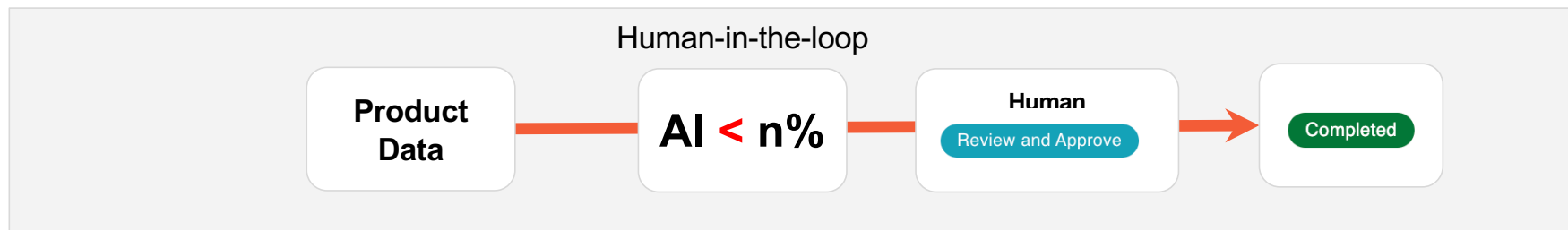
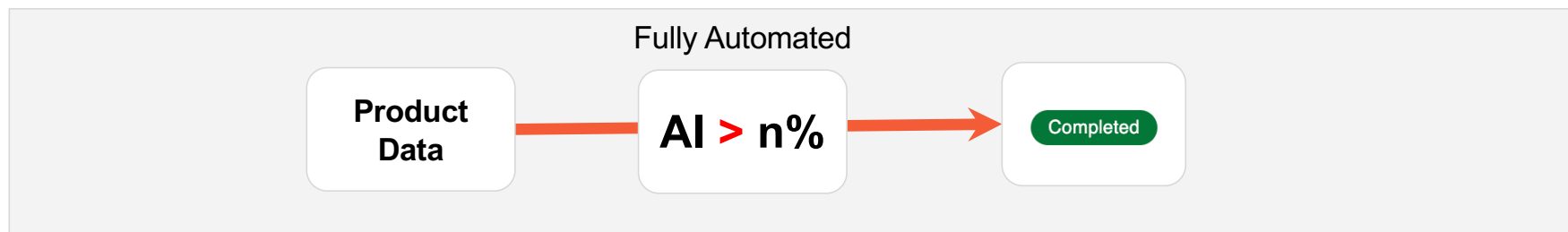


Significant Time Savings, Cost Reduction and ROI.



AI + Human in the loop

Product data, attributes, and attestations are optionally reviewed and approved by a human

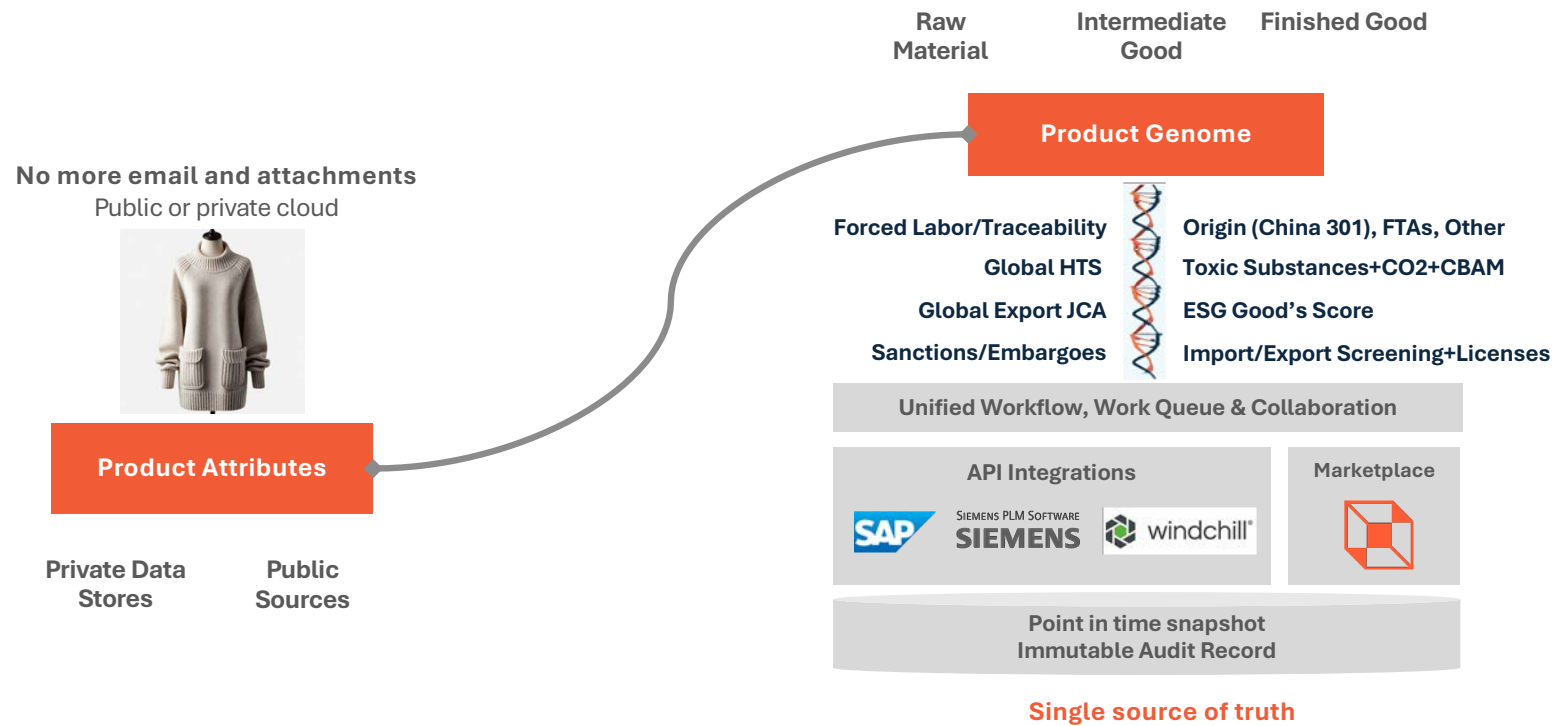


n% = user specific confidence score



SKU Centric

Trade and ESG orchestration, collaboration, agentic workflow, regulatory research, AI-assisted determinations, human experts, immutable audit record - all in one place.



AI Object + Image Classification




ChatKYG.AI™ + New Product

Product Facts ChatTRADE.AI™ Summary

USER Provide a detail description of the product from the highlighted text and other contents from the same website. 9:31 AM

KAY

| Field | Information |
|----------------------------|--|
| Item Name | Bologna Double Strap Sandal  |
| Item Number | Not Specified |
| Item Description | Brand Owner: Bruno Magli. Material of the Outer Sole: The outer sole is likely made of rubber for durability and traction. Material of the Inner Sole: The inner sole is made of leather wrapped around an anatomical footbed, which provides both luxury and support. Material of the Upper Straps: The upper straps are made of genuine Italian leather. Gender: These sandals are designed for men. Price: The price of these sandals is approximately \$225, which is well above USD \$100.00. |
| Classification Description | Men's leather sandals with rubber sole |
| Item URL | https://www.brunomagli.com/products/empoli-dark-brown-empoli-leather-slide-sandal-dark-brown |
| Importer of Record | Bruno Magli |

9:31 AM

Anchoring the product description



Selected Oracle ChatHTS.AI HS Classification: Jurisdiction: United States

QUESTION QUESTION HISTORY

Question / Answer

Question [QID:12694] ✓ Powered by AI Answer

Let's start by confirming your item's description and clarifying whether I made any incorrect assumptions. Is the label self-adhesive, and is it primarily made of paper or a similar material?

Selected Oracle ChatHTS.AI HS Classification: Jurisdiction: United States

QUESTION QUESTION HISTORY

← Re-initiate Submit Answer

Question / Answer

Question [QID:12700] ✓ Powered by AI Answer

The product details do not provide enough information to draft a product description. The item is simply described as a 'shirt' with the item number 'shirt', which is too vague to determine the specific type, style, or purpose of the shirt. While additional online information suggests various types of shirts, such as a DIY oversized button-down shirt, a Hanro cotton seamless short sleeve shirt, and a Hawaiian shirt, these details do not directly relate to the product context provided. Without specific attributes or characteristics of the shirt in question, it is impossible to create a comprehensive product description.

We tried looking for additional information online, but were unable to find any relevant details that could help us draft a product description. Please try again, providing more details about the item itself, and / or specific identifiers that could help us find the item online.

AI assisted Discrepancy Detection



KYGID 73908 Daverunner Sneaker

Product Attributes

- Item Name: Daverunner Sneaker
- Item Description: A stylish sneaker with a mix of colors including green, blue, and black. Features unique laces and branding.
- Item Number: 3138
- Item Type: Product
- Revision: 0
- Business Unit: Select
- Category: Indoor Footwear - Partially Enclosed Uppers
- Gender Marking: Male
- Item Inventory Type: Part Number Item
- Net Weight: 128 oz
- Product Data Owner / Initiator: Aaron Ansel
- Weight: 128 oz

Attestations Active Selected Item Attestation Categories: All New Attestation


KATID 29320 Attribute Image Validation

Workflow Stage: Conductor

Type Code Attributes

- Net Weight**: A net weight of 128 oz. is unusually high for the standard sneakers shown in the product image. The net weight of a pair of athletic sneakers of the type shown typically ranges between 20 and 35 ounces.
- Gender Marking**: The Gender Marking value indicates 'Male', but a gender marking is not explicitly shown in the image of the shoe.
- Category**: The category indicates footwear with 'Partially Enclosed Uppers'. However, the image shows footwear with fully enclosed uppers.

Type Required Attributes





AI-Assisted Post Entry Reviews

Form Approved OMB No. 1651-0022

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection
ENTRY SUMMARY

Transit # 080

| | | | | | | |
|---|--|---------------------------------------|------------------------------------|--|--|-----------------------------|
| 8. Importing Carrier CMA CGM CHRISTOPHE COC | | 9. Mode of Transport 11 | | 1. File Control No. AP02 0117884-8 | 2. Entry Type 01 ABC/A | 3. Summary Date 03/19/23 |
| 12. BL or AMS No. CNDX002109119 | | 13. Manufacturer ID HEPOSS18083701 | | 4. Surety No. 5. Bond Type 054 8 | 6. Port Code 3201 | 7. Entry Date 03/10/23 |
| 10. Country of Origin CN | | 14. Reporting Country CN | | 15. Country of Origin CN | | 11. Import Date 03/11/23 |
| 16. IT. No. | | 17. IT. Date | | 18. Foreign Port of Loading 57225 | | 19. Export Date 04/17/23 |
| 18. Missing Seal | | 19. U.S. Port of Loading 5201 | | 20. Importer No. 65-812807489 | | 21. Reference No. |
| 21. Location of Goods/USC No. NORTH SOUTH FLORIDA COM | | 22. Consignee No. SEANE | | 23. Importer of Record Name and Address COBRA USA INC 3195 NW 97 AVENUE DORAL FL 33173 US | | |
| 25. Ultimate Consignee Name and Address FL City State Zip | | | | | | |
| 27. Description of Merchandise | | | | | | |
| Line No. | 28. A. HTSUS No. B. AD/CVD Case No. | 29. A. Gross Weight B. Net Weight | 30. Net Quantity in HTSUS Units | 31. A. Entered Value B. CDS C. Relationship | 32. A. HTSUS Rate B. AD/CVD Rate C. Rate D. Fee No. | 33. Duty and Fee Cents |
| 001 | 1503 TOTAL CTNS INVOICE 001/INV NO. NAC08021A ARTICLE OF CHINA, CP NTK 20 (R) 9903.88.15 8475 | 8475 | 2 | NOT RELATED 43401 CL872 | 7.58 | 3288.08 |
| | LOUDSPEAKERS OTHER, NSDP 8518.22.8000 8475 | 8475 | 4813 MO | 43401 CL872 | FREE | 0.00 |



| Invoice Reconciles | | | | | |
|--------------------|-------------|-----------|---------------|----------------|--|
| ACE Qty | Invoice Qty | ACE Price | Invoice Price | with ACE Data? | Comment |
| 100 | 100 | 10 | 10 | Yes | Minor rounding difference, quantity matches. |
| 150 | 145 | 12 | 11.9 | No | Small difference in price and quantity, likely due to discount adjustment. |
| 200 | 220 | 15 | 16 | No | Significant price and quantity discrepancy, requires investigation. |

Product Intake Form & Custom Oracle



Compliance Risk Assessment Questionnaire

1 Introduction

This template contains the short risk definition, risk likelihood questions and risk drivers & risk indicators to assess compliance risk.

If you answer '4' or '5' to any of the questions, you should take action to learn more and fix the area you have identified. The best approach is talk with those employees involved in the identified areas/activities. By consulting your employees they take ownership and more readily implement the changes required.

Note: Not all sections in this checklist may apply to your business – if this is the case, leave the section blank. If you can only partly answer yes, then you should tick no.

2 Short definition

Non-compliance with customer requirements, prescribed organisational policies and procedures or laws and regulations may result in lower quality, higher production costs, lost revenues, unnecessary delays, penalties, fines, etc.

| QUESTION # | Risk likelihood | | | | |
|---|-----------------|---|---|---|-----------|
| | Low 1 | 2 | 3 | 4 | High 5 |
| 1. Are products and services subject to regulation or are they likely to become regulated? | | | | | |
| Evaluation - High-risk likelihood is indicated if the company's products or services are subject to several laws and regulations. | | | | | |
| 2. Are company policies and procedures clearly described in writing, regularly updated, communicated and operating effectively? | | | | | |
| Evaluation - High-risk likelihood is indicated if policies and procedures are not clearly described in writing, regularly updated or operating ineffectively. | | | | | |
| 3. Are employees trained for key job activities before they are placed into production, testing or quality control positions? Are they provided with regular training to update the initial training? | | | | | |
| Evaluation - High-risk likelihood is indicated if employees do not receive appropriate training and do not clearly understand what is expected of them. | | | | | |
| 4. Does the company have an executive or oversight committee to insure enforcement of policy and procedure and compliance with legal and regulatory requirements? | | | | | |
| Evaluation - Lack of an oversight executive or committee indicates a high-risk likelihood. | | | | | |
| 5. Is quality control a pervasive part of every process so that no production or distribution errors persist for long? | | | | | |

Oracles and Experts

✖ Cashmere Sweater

Low Utilization High

Select

New Non-Part Questionnaire

Low Utilization High

Select

New Part Questionnaire

Low Utilization High

Select

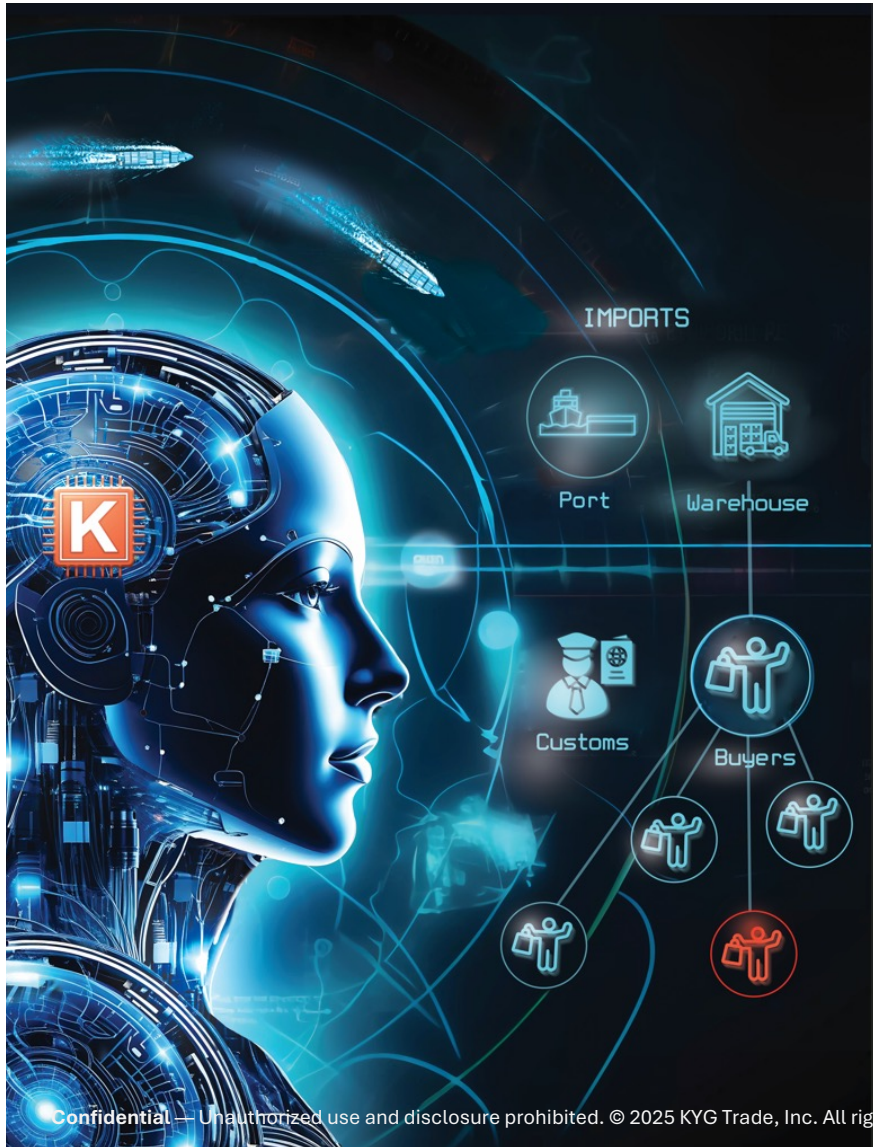
Product Oracle OLRF Execution ID eef1...90cc

Questions
References
Question History
Ask Kay
Ask Someone

| ID | Question | Questionnaire Name | Answer | Modification Date | References |
|----|--------------------------------|--------------------|--------------------------------|----------------------|------------|
| 1 | What is the gender marking? | Cashmere Sweater | Womens | Nov 18, 2024 3:42 PM | |
| 2 | What is the material? | Cashmere Sweater | Cashmere | Nov 18, 2024 3:42 PM | |
| 3 | What is the stitch count? | Cashmere Sweater | 7 stitches per two centimeters | Nov 18, 2024 3:42 PM | |
| 4 | What is the color? | Cashmere Sweater | Beige | Nov 18, 2024 3:42 PM | |
| 5 | What is the country of origin? | Cashmere Sweater | Jordan | Nov 18, 2024 3:42 PM | |



Classification



Single Window HS Orchestration



Desktop

Search by Item Number

Todd R. Smith (SGT)
todd@smithglobaltrade.com

Oracles and Experts

| | | | |
|--|--|--|--|
| Utilization: Low to High Select | DUTY & TAXES MADE SIMPLE Utilization: Low to High Select | Utilization: Low to High Select | Utilization: Low to High Select |
| Utilization: Low to High Select | Utilization: Low to High Select | | |

AI-Assisted HS Classification

Product Attributes

Item Name Cashmere Jet Set Crew

Item Description 100% cashmere women's sweater. Stitch count, 7 stitches per two centimeters

Item Number 4838349

Item Type Product

Revision 1

Business Unit Trade

Brand Owner KYG Trade Textiles

Category Sweaters/Pullovers

Color Beige

Gender Marking Womens

Legacy US HTS Classification 6110121020

Product Specifications View JSON

Oracles and Experts

Utilization: Low to High

Powered by AI

Select

Self

Utilization: Low to High

Select

Utilization: Low to High

Revise Classification

Collaboration Activity on Current KATID (40656)

Comments | Emails | **Changelog** | Supporting Files | Notifications | Participants

| PM | Author | Action | Date | Product | Assessment | Oracle |
|----|---------------|---|---------------------|---------------|------------------|--------|
| PM | Peyton Montei | Re-initiate the Chat AI oracle | 2025-01-10 16:06:51 | Product 33986 | Assessment 40656 | Oracle |
| PM | Peyton Montei | changed assessment workflow state | 2025-01-10 16:04:56 | Product 33986 | Assessment 40656 | |
| | | Inflator → Conductor | | | | |
| PM | Peyton Montei | changed assessment Attestation Reason attribute | 2025-01-10 16:04:52 | Product 33986 | Assessment 40656 | |
| | | NA → New Item | | | | |

Load more (3/3) changelogs

Powered by Kay

Powered by AI



Based on the information provided, the most likely HS code for the women's cashmere sweater is 6110121020. This item is a women's sweater known as the Cashmere Jet Set Crew, constructed from 100% cashmere material. It features a stitch count of 7 stitches per two centimeters, indicating a fine gauge knit. The sweater is designed with extended, ribbed cuffs, wide sleeves, and shoulder panels, contributing to its relaxed fit. The color of the item is beige, and it is categorized under sweaters/pullovers. The sweater also includes two large, ribbed pockets on the front, enhancing its casual look. The legacy country of origin for this product is Jordan, and it falls under the business unit of Trade, with a legacy US HTS classification of 6110121020. The item number is 4838349, and it is specifically marked for women's wear.

The selected classification code, 6110121020, applies to articles of apparel and clothing accessories, knitted or crocheted, specifically sweaters, pullovers, sweatshirts, waistcoats (vests), and similar articles made wholly of cashmere. The rationale for applying this code includes several factors, including the item's construction from 100% cashmere, which aligns with the description under HS Subheading 611012. The stitch count of 7 stitches per 2 centimeters confirms it as a sweater according to the defined term for 'sweaters' in the HS notes. The presence of ribbed pockets does not exclude it from this classification, as per the WCO Explanatory Notes. Previous rulings, such as Ruling J85014, have classified similar items under this subheading, supporting this classification choice.

The General Rule of Interpretation applied in this classification is GRI 1, which states that classification shall be determined according to the terms of the headings and any relative section or chapter notes. GRI 1 applies because the item description matches the specific language of the classification code 6110121020, which covers women's or girls' sweaters made wholly of cashmere.

During the classification process, key questions focused on the material composition and design features of the sweater, such as the stitch count and presence of ribbed pockets. The answers confirmed that the sweater is made entirely of cashmere and fits the description of a sweater under the HS notes, leading to the selection of the appropriate code.

At the six-digit level, we considered other codes such as 611090 and 611011, which might have been appropriate if the item was made of a blend of cashmere and another textile material, such as silk, or if it was made of wool instead of cashmere. At the full code level, we also considered 6110121060, 6110122030, and 6110122080, but these were not selected because they pertain to garments not wholly made of cashmere or not classified as sweaters. In summary, 6110121020 was the most appropriate choice for a women's cashmere sweater.

--Comparison to Existing Classification--
The selected code matches the existing code, 6110121020, provided by the client.

Search CROSS rulings using natural language



ChatKYG.AI™

Product Facts ChatTRADE.AI™ Summary

Search Chat

4. **Value:** The declared value of the sandals, classification and duty rates.

5. **Country of Origin Marking:** Confirmation as this is a requirement for legal importation.

By providing this information, one can accurately determine the Harmonized Tariff Schedule (HTS) subheading.

Sources: [Ruling K80030](#) [Ruling L85776](#) [Ruling F88438](#)

USER: What is the HS code for mens leather sandals?

KAY: The HS code for mens leather sandals is 6403.99.90. Sandals have uppers predominantly made of rubber/plastics and uppers of predominantly leather.

What is the HS code for my product and why does this HS code apply? Summarize the rulings and analyze their key differences.

Ask me questions about bookmarked topics here...

NY L85776 [Open in new tab](#)

July 7, 2005

CLA-2: 64:RR:NC:247 L85776

CATEGORY: Classification

TARIFF NO.: 6403.99.60, 6403.99.90, 6404.19.35

Ms. Sara K. Bowersox
Dr. Martens AirWair USA, LLC.
3627 N. Anchor Street
Portland, OR 97217

RE: The tariff classification of footwear from China.

Dear Ms. Bowersox:

In your letter dated June 22, 2005 you requested a tariff classification ruling for five footwear styles from China. You have submitted samples that you identify as item numbers 8C33 and 8C35, men's sandals with outer soles of rubber/plastics and uppers of predominantly leather, 8C34, a man's sandal with an outer sole of rubber/plastics and an upper of predominantly textile material, 8C29 and 8C26, men's below the ankle casual shoes with outer soles of rubber/plastics and uppers of predominantly leather.

Although you indicate that the samples are men's, they are the type of footwear commonly worn by both sexes. Without a corresponding style for females, the footwear is considered unisex for classification purposes. You have provided a value of over \$2.50/pair for all five styles.

The applicable subheading for item numbers 8C33, 8C35, 8C29 and 8C26 in sizes up to and including American men's size 8 will be 6403.99.90, Harmonized Tariff Schedule of the United States, (HTS), which provides for footwear with outer soles of rubber or plastics and uppers of leather, other, for other persons, valued over \$2.50/pair. The general rate of duty will be 10 percent ad valorem. The applicable subheading for these

ChatKYG, AI & Trade Korpus™



Trade Korpus™

Welcome to Trade Korpus™
The world's most comprehensive knowledge base of import, export and product compliance laws, regulations, rulings, control lists, and tariffs for deep trade compliance research.

Search Trade Korpus

Trade Korpus™ Search Chat HPE server rack

USER: Draft a Customs Ruling Submission for an HPE Server Rack

KAY: Customs Ruling Submission for HPE Server Rack

To:
U.S. Customs and Border Protection
Office of Trade
Washington, D.C. 20229

From:
[Your Name]
[Your Title]

Search Chat HPE server rack

Date: [Insert Date]

Subject: Request for Tariff Classification Ruling for HPE Server Rack

Introduction:

This submission requests a tariff classification ruling for the HPE Server Rack, which is designed to securely house and organize computer server equipment. The server rack is a floor-standing unit made of metal, specifically designed for use in data centers and IT environments.

Product Description:

The HPE Server Rack is a modular, metal structure that provides support for various server components. It is designed to accommodate standard 19-inch rack-mounted equipment and includes features such as adjustable mounting depths, lockable doors, and ventilation for airflow. The rack is imported unassembled and includes all necessary hardware for assembly.

Tariff Classification:

Based on the Harmonized Tariff Schedule of the United States (HTSUS), the HPE Server Rack is classified under subheading 9403.20.0086, which covers "Other furniture and parts thereof: Other metal furniture: Other: Counters, lockers, racks, display cases, shelves, partitions and similar fixtures: Other." This classification is supported by previous rulings, including:

- **N333727:** Classification of computer server relay racks under HTSUS 9403.20.0086, indicating that such racks are considered furniture used for securing computer server equipment.
- **N304033:** Classification of modular server racks under HTSUS 9403.10.0040, which also supports the classification of similar products as metal furniture used in offices.

Conclusion:

AI-Assisted ECCN Classification



Product Attributes

Item Name Helicopter Main Rotor

Item Description Helicopter main rotor features Advanced Composite Rotor Blades for reduced weight and improved efficiency, a Robust Rotor Hub Design for precise control, and a Precision Bearing System for minimal maintenance. It also includes an Integrated Swashplate Assembly. Impact of 7.62mm or larger projectiles

Item Number 5549

Item Type Product

Revision Test

Business Unit Trade

Item Inventory Type Part Number Item

Oracles and Experts

Utilization

Low High

Powered by AI

Engines
Decision Tree
Business Rule

Select

Self

Utilization

Low High

Select

Utilization

Low High

Select

Question [QID:12697] Powered by AI

We determined the export classification code (ECN) for the Helicopter Main Rotor, with an item number of 5549, designed for advanced performance in aviation, is 08.h.18. This classification was meticulously chosen to reflect the rotor's specialized design and its critical role in military aviation. The rotor is not just a component; it is a sophisticated piece of engineering that embodies advanced composite rotor blades, which significantly reduce weight and enhance efficiency. Its robust rotor hub design ensures precise control during operation, while the precision bearing system minimizes maintenance, making it an indispensable part of the helicopter's flight control system.

The rotor's integrated swashplate assembly is pivotal in controlling the pitch of the rotor blades, a feature that underscores its importance in the helicopter's drive system. However, what truly sets this rotor apart is its optimization for performance under ballistic impact. It is engineered to withstand impacts from projectiles of 7.62mm or larger, a testament to its suitability for military applications where durability and resilience are paramount.

The classification under 08.h.18 is not arbitrary but a deliberate decision based on the rotor's ability to function after the impact of such projectiles. This aligns perfectly with the requirements of USML 08.h.18, which pertains to drive systems, flight control systems, and parts and components specially designed for such conditions. The rotor's military-grade design and its critical function in controlling rotor blade pitch further affirm its classification under this category.

Collaboration Activity on Current KATID (40656)

Comments | Emails | **Changelog** | Supporting Files | Notifications | Participants

| | Initiator | Action | Date | Product | Assessment | Oracle |
|----|---------------|---|---------------------|---------------|------------------|--------|
| PM | Peyton Montei | Re-initiate the Chat AI oracle | 2025-01-10 16:06:51 | Product 33986 | Assessment 40656 | Oracle |
| PM | Peyton Montei | changed assessment workflow state | 2025-01-10 16:04:56 | Product 33986 | Assessment 40656 | |
| PM | Peyton Montei | changed assessment Attestation Reason attribute | 2025-01-10 16:04:52 | Product 33986 | Assessment 40656 | |

Load more (3/3) changelogs

Alternative classifications were considered, such as 08.h.2, 08.h.3, 9A610.w.1, and 9A619.c, each with specific conditions that did not align with the rotor's design and intended use. For instance, 08.h.2 would apply if the rotor were part of a gearbox with specific performance criteria, while 08.h.3 would be relevant if it were part of an automatic rotor blade folding system. Similarly, 9A610.w.1 and 9A619.c were considered for UAV applications and military gas turbine engines, respectively. However, none of these alternatives matched the rotor's unique characteristics and military application.

Furthermore, an assessment was conducted to determine if a "commercial equivalent" exception could apply, which would necessitate a different classification. However, no commercial equivalent was found, as the web results did not provide a clear connection to a rotor with the same advanced performance and ballistic impact resistance. This lack of commercial availability reinforced the decision to classify the rotor under 08.h.18.

In conclusion, the classification of the Helicopter Main Rotor under ECN 08.h.18 is a reflection of its specialized design, military application, and the absence of a commercial equivalent. This decision ensures that the rotor is appropriately categorized, acknowledging its critical role in military aviation and its ability to withstand the rigors of combat environments.

Global Jurisdiction Classification & Qualification



Attestations Active | v Selected Item | v Attestation Categories: All | v New Attestation v ↻ × ⋮

| P | KATID | Type | Value | Jurisdiction | Workflow Stage | Assignee | Status | Last Modified | Actions |
|---|------------------------|------|-----------------------------|---------------|----------------|---------------|------------|----------------------|---------|
| | 120922 | ECN | | Japan | Conductor | | ✓ Active v | 2024-12-09 12:32 EST | |
| | 120920 | ECN | | United States | Conductor | | ✓ Active v | 2024-12-09 12:30 EST | |
| | 117809 | FTA | Qualified | Belgium | Conductor | | ✓ Active v | 2024-12-09 11:37 EST | |
| | 117808 | FTA | Qualified | United States | Conductor | | ✓ Active v | 2024-12-09 11:37 EST | |
| | 117778 | HS | 6101302010 / 6 101300000 | United States | Completed | Peyton Montei | ✓ Active v | 2024-11-29 16:08 EST | |
| | 117777 | HS | | Belgium | Conductor | | ✓ Active v | 2024-12-06 13:36 EST | |
| | 117776 | HS | | Canada | Conductor | | ✓ Active v | 2024-12-06 13:45 EST | |

10 / page ^ | << < 1 > >>

Tradesheet™



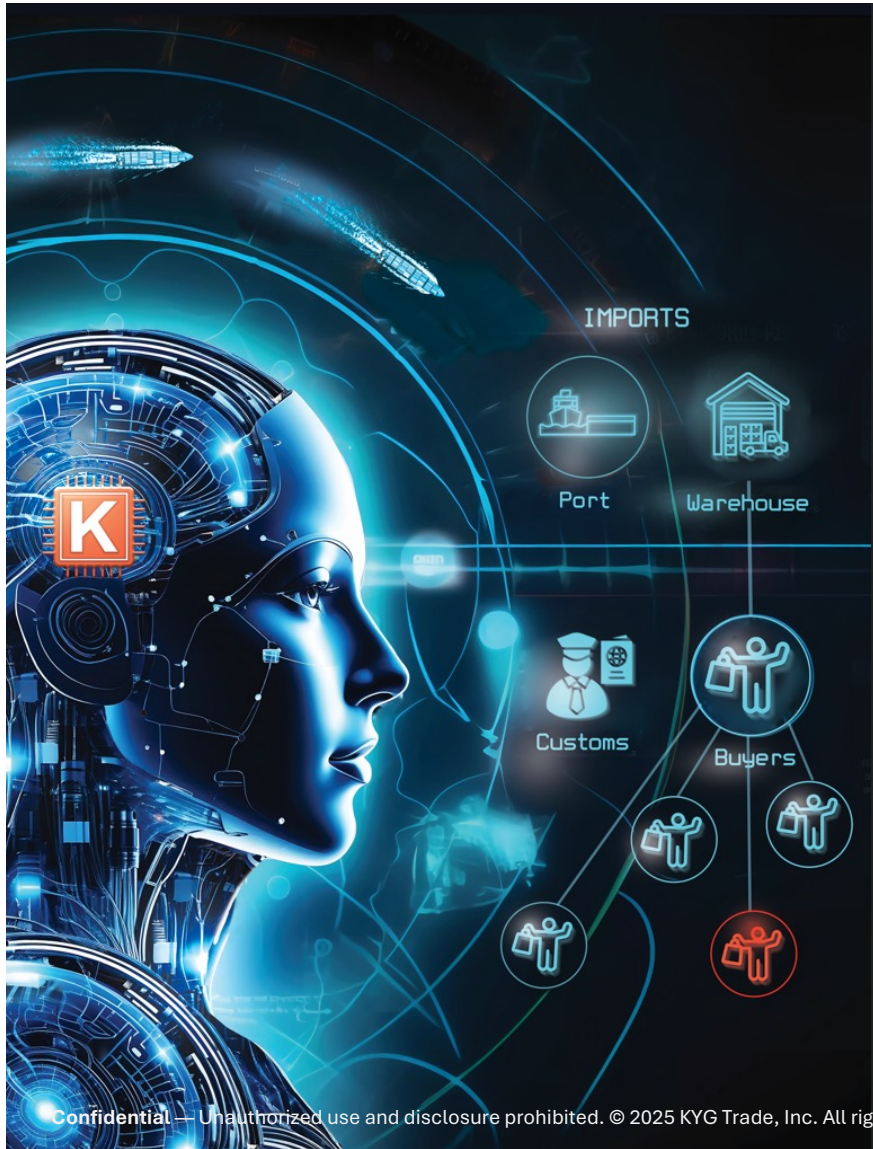
KTSID 213 Tradesheet™ Cashmere Sweater Tradesheet

Tradesheet™ Type: BOM/CTO | Status: New

| <input type="checkbox"/> | KYGID | Level | Item Name | Workflow Stage | Oracles and Experts | Question |
|--------------------------|-----------------------|-------|-----------------------|----------------|---------------------|--|
| <input type="checkbox"/> | 33992 | Item | 5 Heat Transfer Label | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the Heat Transfer Label is 4908900000. This item is a specialized label ... |
| <input type="checkbox"/> | 33991 | Item | 4 THREAD | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the needlework thread is 5402620000. This item is a 4-thread ... |
| <input type="checkbox"/> | 33990 | Item | 9 100% Cashmere Yarn | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the cashmere yarn is 5109109000. This item is 100% cashmere yarn, ... |
| <input type="checkbox"/> | 33988 | Item | 6 TAG PIN | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the 6 TAG PIN is 7317005519. This item is a fastener ... |
| <input type="checkbox"/> | 33995 | Item | 10 NECK TAPE | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the neck tape is 5806321060. This item is a narrow woven fabric, specifically ... |
| <input type="checkbox"/> | 33989 | Item | 2 Carton Sticker | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the carton sticker is 3919905060. This item is a set of two ... |
| <input type="checkbox"/> | 33993 | Item | 7 Care Label | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the care label is 5807100520. This item is a woven textile label designed to ... |
| <input type="checkbox"/> | 33996 | Item | 8 Hangtag | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the hangtag is 4821102000. This item is a printed hangtag, categorized ... |
| <input type="checkbox"/> | 33994 | Item | 1 Carton | Conductor | ChatHTS.AI | Based on the information provided, the most likely HS code for the postal packaging carton |



FTA Qualification



BOM Data Verification



KYGID 76574 Men's Windbreaker

BOMID 1690 Bill of Material

Tradesheet™ Upload File

| | Level | Order | Item Name | Item Type | Item Subtype | Item Number | Product Data Owner / Initiator | Supplier Name | Price per |
|--------------------------|-------|-------|------------------------|---------------------------|---------------------------|------------------------------|--------------------------------|---------------|-----------|
| <input type="checkbox"/> | 0 | 0 | Men's Windbreaker | Selected Oracle | ChatFTA.AI™ | | | | |
| <input type="checkbox"/> | 1 | 1 | CARTON TAPE | Country of Origin: Jordan | Preference Criterion: RVC | FTA Qualification: Qualified | | | |
| <input type="checkbox"/> | 1 | 2 | NGC LABEL | | | | | | |
| <input type="checkbox"/> | 1 | 3 | Recycled version of... | | | | | | |

Manufacturing Engineering Manufacturing Raw Material As-Shipped

QUESTION QUESTION HISTORY

Question History

Question #3 Please make sure to add the Total Cost attribute for each of the following KYGIDs: 76575, 76579, 76581, 76583, 76593, 76602, 76606

Answer: I have updated the Total Cost for every BOM item. Please try again.

Initiate Accept and Continue

AI-Assisted Identification of Missing Documents




Selected Oracle ChatFTA.AI™

Country of Origin: Preference Criterion: FTA Qualification:

← Re-initiate Submit Answer

QUESTION QUESTION HISTORY

Question / Answer ✕

Question [QID:4b4c40ed-466b-492d-a8fd-f19227776c4]  **Powered by AI**

I was not able to find a Purchase Order supporting document for this KYGID. Would you like to continue without this supporting file?

Answer

Yes, continue without the Purchase Order.

No, I have a Purchase Order supporting document.

AI-Assisted Supplier Solicitation

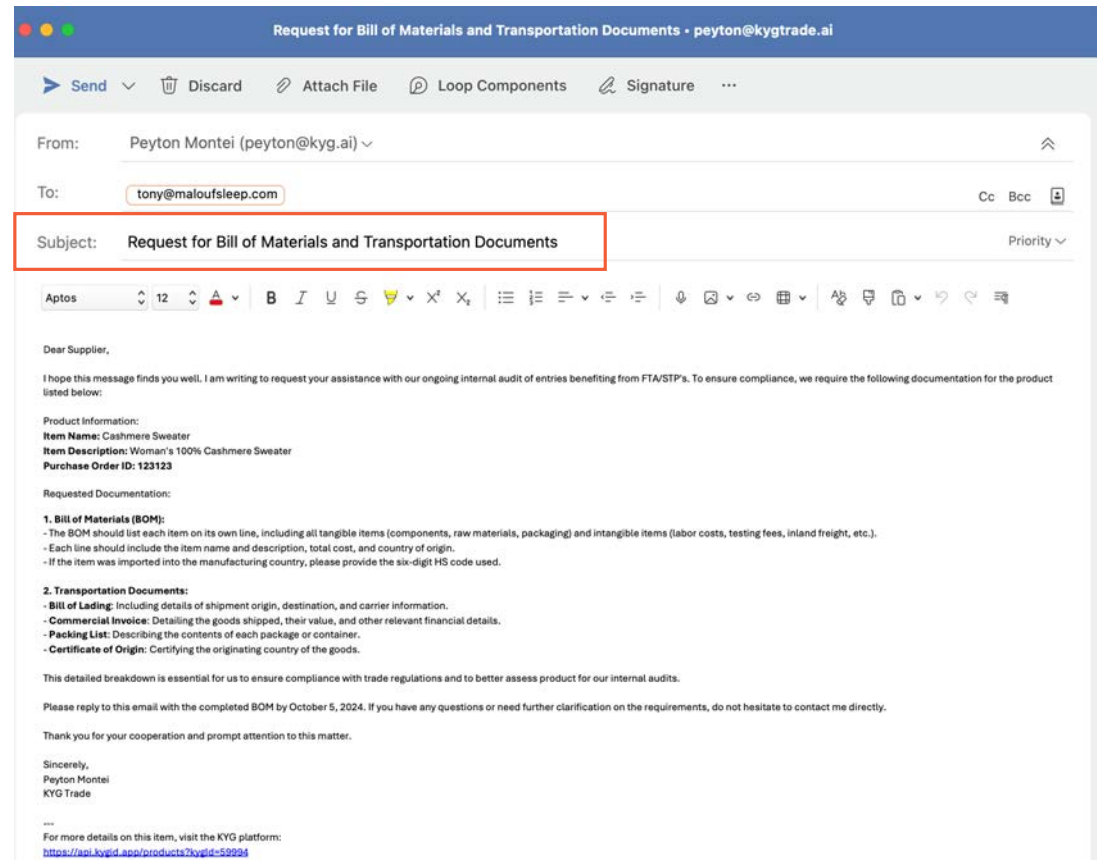


Identify Gaps In Documentation

- KYG identifies the documents you will need to defend an FTA qualification or UFLPA detention notice and identify the data gaps you currently have

Supplier Solicitation Workflow

- Generative AI can assist in soliciting necessary documents from your supply chain, reducing the human burden of corresponding with multiple parties



COO Validation



KYGID 73908 Daverunner Sneaker

Product Attributes



| | |
|--------------------------------|--|
| Item Name | Daverunner Sneaker |
| Item Description | A stylish sneaker with a mix of colors including green, blue, and black. Features unique laces and branding. |
| Item Number | 3138 |
| Item Type | Product |
| Revision | 1 |
| Business Unit | Trade |
| Category | Indoor Footwear - Partially Enclosed Uppers |
| Gender Marking | Male |
| Item Inventory Type | Part Number Item |
| Legacy Country of Origin (CoO) | Vietnam |
| Net Weight | 128 oz |
| Product Data Owner / Initiator | Aaron Ansel |
| Weight | 128 oz |

Attestations

Active

Selected Item

Attestation Categories: All

New Attestation



KATID 29320 Attribute Image Validation



Workflow Stage: Conductor

Type Code Attributes

Country of Origin (COO) Vietnam

Commodity Description The item description, selected tariff, and manufacturer do not comport with the information in shipping documentation.

Shipment Certificate of origin date covers shipments for 2024, whereas actual shipment was 2025.

Type Required Attributes





AI-Assisted FTA Qualification

RVC, non-originating goods, and transshipment analysis

Oracles and Experts

ChatFTA.AI™

Low Utilization High

Preference Criterion: RVC

FTA Qualification: Qualified

Based on the analysis of the Rules of Origin (ROOs) under the Free Trade Agreement (FTA), the finished good qualifies for the FTA.

Completed

View Questionnaire

KA

Kay AI 9 days ago [Product 33986](#) / [Assessment 29598](#) / [Oracle](#)

The finished good, Cashmere Jet Set Crew, with Item Number 4838349 and KYGID 33986, qualifies for special treatment under the FTA, Jordan-United States treaty.

The rules of origin applicable to the Cashmere Jet Set Crew under the FTA require a Regional Value Content (RVC) of 35% or higher. Upon thorough evaluation, the product was found to have an RVC of 61.0%, significantly exceeding the required threshold. This high percentage confirms that the majority of the product's value is derived from materials and labor originating within the partner countries, thereby meeting the FTA's criteria for preferential treatment.

The transport documentation was meticulously reviewed to ensure compliance with the FTA's direct transport rules. The goods were shipped from Irbid, Jordan, to Haifa, Israel, before reaching their final destination in Los Angeles, USA. Despite passing through Israel, the product qualifies under the direct transport criteria as outlined in Article 8 of the FTA. The goods did not enter into the commerce of Israel and remained under the control of customs authorities, with no operations performed other than those necessary to preserve the product's condition. The shipping documents clearly indicate the USA as the final destination, supporting the product's eligibility for special treatment.

The qualification process involved a detailed examination of each component of the Cashmere Jet Set Crew to determine its origin status. Components such as the heat transfer label, thread, cashmere yarn, hangtag, carton, polybag, and sizer were identified as originating materials from Jordan, thus contributing to the product's RVC. Conversely, items like the tag pin, neck tape, carton sticker, care label, and hanger-padded natural fibers were not considered originating materials, as they did not meet the FTA's criteria for indirect materials. Despite these non-originating components, the overall RVC calculation confirmed the product's qualification.

In conclusion, the Cashmere Jet Set Crew meets the necessary requirements for special treatment under the FTA, Jordan-United States treaty, due to its substantial regional value content and adherence to direct transport rules. This qualification allows for preferential tariff treatment, facilitating smoother trade between Jordan and the USA.



AI-Assisted FTA Qualification

Tariff Shift, De minimis, and transshipment analysis




Preference Criterion :
TS

FTA Qualification :
Qualified

The attestation is
Qualified with 1 out of 1
products qualifying for
Free Trade Agreements.

Revise
Classification

Accept and
Continue

KA **Kay AI** a month ago [Product 73614](#) / [Assessment 28949](#) / [Oracle](#)
The attestation is Qualified with 1 out of 1 products qualifying for Free Trade Agreements.

Item Name: ██████████ GLASS FOOD STORAGE SET
Item Number: GL ██████████
KYGID: 73600

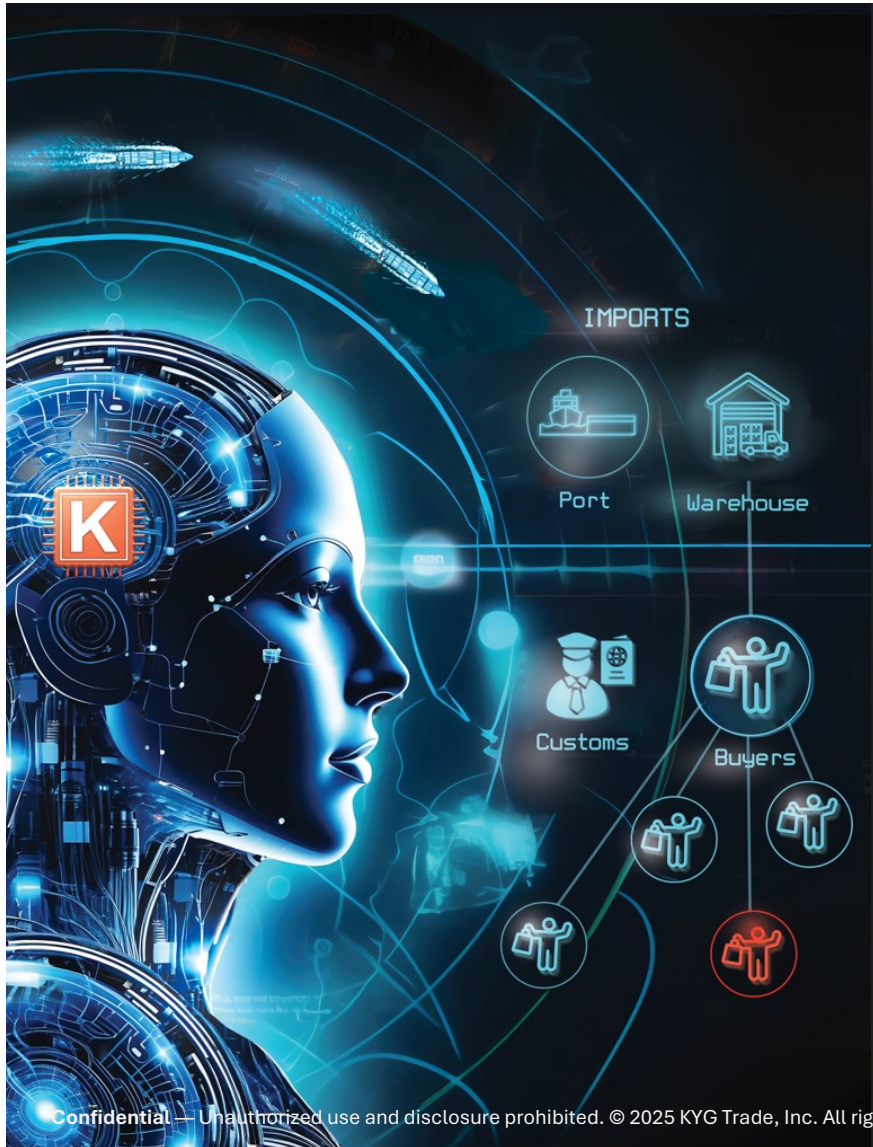
The ██████████ GLASS FOOD STORAGE SET is subject to the rules of origin under the Korea-United States Free Trade Agreement (FTA). The applicable criterion is the Tariff Shift, which requires that components classified under Heading 70.09 through 70.18 must undergo a shift from any other heading outside that group. Exceptions to this rule include glass inners for vacuum flasks or other vacuum vessels of heading 70.20 or headings 70.07 through 70.08. Additionally, a de minimis rule of 10% applies, allowing for minor non-originating materials.

In reviewing the transport documentation, it was confirmed that the goods were shipped directly from Busan, South Korea, to Norfolk, VA, USA, without any transshipment. This direct route satisfies the FTA's transportation requirements, which stipulate that goods must not undergo production or operations outside the territories of the Parties and must remain under the control of customs authorities. The documentation supports that the product meets the criteria for direct transportation.

The qualification process involved a thorough examination of each component of the product to ensure compliance with the FTA's rules of origin. Each component, including various TPE/PP lids and glass bodies, was verified as originating from South Korea, one of the partner countries. This compliance with the Tariff Shift criteria confirms that the finished good qualifies for special treatment under the FTA. The conclusion is that the ██████████ GLASS FOOD STORAGE SET meets all necessary requirements, allowing it to benefit from the preferential tariff treatment provided by the Korea-United States FTA.



Non-Preferential Origin UFLPA Compliance



AI-Assisted 301, UFLPA & FTA Analysis



SKU Specific Analysis

- Leveraging AI and OCR to analyze and understand product data and documents in real time

Identifying & Organizing Relevant Information

- Supply Chain Mapping
- Counterparties & Roles
- Risk Levels (Sayari, Kharon, Descartes)

- Exhibits and Documentation

Accelerated Reporting

- Leveraging generative AI capabilities to draft reports quickly and effortlessly
- Customizable templates and use cases

Emails, PDFs, Excel, Images, or via API

The collage shows several overlapping documents. At the top are two 'COMMERCIAL INVOICE' forms with fields for invoice number, date, and company information. Below them are two 'PURCHASE ORDER' forms, one dated 3/1/24 and another dated 2/22/24. The background features a detailed BOM table with columns for YSD, Level, Item Name, Item Type, Item Number, Manufacturer, Price Per Unit, Currency, Percent, UOM, and Country of Origin (with new suppliers).

| YSD | Level | Item Name | Item Type | Item Number | Manufacturer | Price Per Unit | Currency | Percent | UOM | Country of Origin (with new suppliers) |
|------|-------|-----------------------|--------------|-------------|--|----------------|-----------|---------|---------|--|
| 5019 | 1 | Carton | Part | 4643701543 | WestRock | 0.2553 | US Dollar | | 1 Piece | (PCS) Puerto Rico |
| 5028 | 2 | Carton Sticker | Part | 4657962508 | WestRock | 0.02 | US Dollar | | 1 Piece | (PCS) Puerto Rico |
| 5024 | 3 | Printing | Part | 464090048 | WestRock | 0.033 | US Dollar | | 1 Piece | (PCS) China |
| 5023 | 4 | WELPAD | Part | 34301745327 | China | 1.3 | US Dollar | | 1 Piece | (PCS) China |
| 5689 | 4.1 | Cotton | Raw Material | 23556 51 | Akzo Huafu Melange Yarn Co., Ltd | 0.01 | US Dollar | | 1 Piece | (PCS) China |
| 5021 | 5 | Heat Transfer Label | Part | 547480472 | SS Int | 1.03 | US Dollar | | 1 Piece | (PCS) Hong Kong |
| 5029 | 6 | Tag Pin | Part | 4178270480 | Gembak | 0.2003 | US Dollar | | 1 Piece | (PCS) India |
| 5025 | 7 | Care label | Part | 744484204c | SS Int | 0.008 | US Dollar | | 1 Piece | (PCS) Hong Kong |
| 5026 | 8 | Hanging | Part | 425107464c | Fanka Plast | 3.08 | US Dollar | | 1 Piece | (PCS) India |
| 5024 | 9 | 100% Cashmere Yarn | Part | 588748541 | Dongguan City Huating Garment Co., Ltd | 1.6 | US Dollar | | 1 Yards | (PCS) China |
| 5020 | 10 | NECK TAPE | Part | ac1309940 | Fanka Plast | 1.33 | US Dollar | | 1 Yards | (PCS) India |
| 5027 | 11 | SIZER | Part | 268284742 | SS Int | 0.0075 | US Dollar | | 1 Piece | (PCS) Hong Kong |
| 5541 | 12 | HANDER PADDED NATURAL | Part | 464613874 | Fanka Plast | 0.289 | US Dollar | | 1 Piece | (PCS) India |



Section 301 & AD/CVD Evasion

We use AI to assist with visibility into 301 duty rates, PGA/OGA flags, AD/CVD cases, applicable rulings, and section and chapter notes.

The screenshot displays the KYG Trade interface for a product named "Laptop HP". The left sidebar shows product attributes such as Item Name, Description, and Revision. The main panel is divided into several sections:

- HTS Code:** Shows the HTS Code 6401.99.10.00, which is highlighted with a red box. The description is "Covering The Knee".
- Unit Of Quantity:** Shows the value "Pairs (prs.)".
- Rates Of Duty:** Shows a General rate of 37.5% with a "Panama Special Rate" callout. Other rates include Special (Free), Penalty (75%), and another Penalty (62.5% for Chinese Origin Goods).
- Chapter 98/99:** Shows a Special HTS Code 9903.88.15 with a rate of +25%.
- ADD/CVD Flags:** Shows flags for ADD and CVD, both set to "No".
- PGA Flags:** Shows flags for AMB and FDA, with descriptions related to USDA and FDA requirements.

AI-Assisted Non-preferential Origin + 301 Analysis



Trade Korpus (Beta) Search by Item Number

Todd R. Smith (SGT) todd@smithglobaltrade.com

Trade Korpus™ Search Chat vacuum cleaners

Search Filters

Number of results: 30

Date range: Start date 01/01/2018, End date 11/15/2024

United States

US Rulings (30)

Collection

- Admissibility(0)
- Bond(0)
- Broker(0)
- Carrier(0)
- Classification(0)
- Conditionally Free Merchandise(0)
- Drawback(0)
- Entry Procedures(0)
- Free Trade Agreements(0)
- Intellectual Property Rights(0)
- Marking(0)
- Origin(30)
- Protest(0)

| Date | Ruling | Category | Subject | Kay's reason | Bookshelf (21) | Clear all |
|------------|------------|----------|---|--|--|-----------|
| 19/05/2021 | NY N319177 | Origin | The country of origin of vacuum cleaners | Discusses The Substanti Transformation Of Vacuum Vietnam. | Ruling: NY N323214 Date: 09/01/2022 Rulings reference: The country of origin of vacuum cleaners | |
| 22/03/2022 | NY N324519 | Origin | The country of origin of vacuum cleaners | Explains The Manufactur Of Vacuum Cleaners In Cf Vietnam. | Category: Origin | |
| 24/08/2020 | NY N313694 | Origin | The country of origin of vacuum cleaners | Addresses The Assembly Cleaners In Vietnam From Sourced From China And | Ruling: NY N319177 Date: 19/05/2021 Rulings reference: The country of origin of vacuum cleaners | |
| 09/01/2022 | NY N323214 | Origin | The country of origin of vacuum cleaners | Mentions The Manufactu Processes Of Dyson V8 Ve Cleaners In Mexico. | Category: Origin | |
| 17/08/2020 | NY N313471 | Origin | The country of origin of vacuum cleaners | Discusses The Substanti Transformation Of Vacuum Vietnam. | Ruling: NY N313471 Date: 17/08/2020 Rulings reference: The country of origin of vacuum cleaners | |
| 25/04/2019 | NY N303710 | Origin | The country of origin and Section 301 trade remedy of vacuum cleaners from Vietnam | | Category: Origin | |
| 18/05/2021 | NY N319176 | Origin | The country of origin of vacuum cleaners | | Ruling: NY N303710 Date: 25/04/2019 Rulings reference: The country of origin and Section 301 trade remedy of vacuum cleaners from Vietnam | |
| 20/04/2020 | NY N311063 | Origin | The country of origin of upright vacuum cleaners | | Category: Origin | |
| 06/08/2019 | NY N305221 | Origin | The Country of Origin of Vacuum Cleaners from Vietnam and Applicability of Section 301 Trade Remedies | | Ruling: NY N313694 Date: 24/08/2020 Rulings reference: The country of origin of vacuum cleaners | |
| 04/11/2021 | NY N322549 | Origin | The country of origin of vacuum cleaners | | Category: Origin | |
| 08/03/2020 | NY N309819 | Origin | The country of origin of vacuum cleaners | | Ruling: NY N313699 Date: 20/08/2020 Rulings reference: The country of origin of vacuum cleaners | |
| | | | | | Category: Origin | |

AI-Assisted Non-preferential Origin + 301 Analysis



The screenshot shows the Trade Korpus (Beta) chat interface. At the top, there is a search bar with the text "Search by Item Number" and a search icon. To the right of the search bar, the user's name "Todd R. Smith (SGT)" and email "todd@smithglobaltrade.com" are displayed. Below the search bar, there is a "Chat" button and a search input field containing "vacuum cleaners". A "New chat" button is also visible.

The chat history shows two messages from the "USER" and two responses from "KAY".

Message 1:
USER: Does the country of origin of the vacuum cleaner motor determine the country of origin of the finished vacuum cleaner?
KAY: The country of origin of the vacuum cleaner motor does not solely determine the country of origin of the finished vacuum cleaner. The determination of the country of origin for the finished vacuum cleaner is based on the substantial transformation criteria, which consider factors such as the extent of processing, changes in commercial designation, worker skill, and resources expended on product design. The rulings indicate that the country of origin is determined by where the substantial transformation of components and sub-assemblies into the finished product occurs, rather than solely by the origin of a specific component like the motor.
Sources: Ruling N305911 Ruling N309819 Ruling N313694 Ruling N311063
Ruling N316290 Ruling N305821 Ruling N322549 Ruling N305154
Ruling N313699 Ruling N305221 Ruling N310020 Ruling N319177
Ruling N322606 Ruling N319176 Ruling N324519 Ruling N321393
Ruling N303710 Ruling N323214 Ruling N313471 Ruling N314159

Message 2:
USER: In which rulings did the country of origin of the finished vacuum cleaner equal the country of origin of the PCBA?
KAY: The country of origin of the finished vacuum cleaner equaled the country of origin of the PCBA in the ruling discussed in Source ID: N305154.
Sources: Ruling N305911 Ruling N309819 Ruling N313694 Ruling N311063
Ruling N316290 Ruling N305821 Ruling N322549 Ruling N305154
Ruling N313699 Ruling N305221 Ruling N310020 Ruling N319177
Ruling N322606 Ruling N319176 Ruling N324519 Ruling N321393
Ruling N303710 Ruling N323214 Ruling N313471 Ruling N314159



AI-generated “draft” 301 origin analysis

The subject merchandise is a NextWave vacuum cleaner, an advanced, Wi-Fi-connected cleaning device used to clean floors. It features a 3-stage cleaning system designed to loosen, lift, and suction dirt, dust, and debris from hard floors and carpets. The set includes the NextWave vacuum cleaner, a rechargeable battery, a docking station for recharging, and a power cord. The NextWave may also include an optional accessory to define cleaning boundaries. The NextWave will be imported from Thailand, packaged for retail sale.

The applicable subheading for the NextWave vacuum cleaner will be 8508.11.00, which provides for Vacuum cleaners; parts thereof. With self-contained electric motor. Of a power not exceeding 1,500 W and having a dust bag or other receptacle capacity not exceeding 20 L. The rate of duty will be free.

Duty rates are provided for your convenience and are subject to change. The text of the most recent HTSUS provisions is provided for your reference.

Example of a 3-page draft 301 origin analysis, which took 5 seconds to create

You should determine whether the merchandise is covered by the additional duties and taxes of 301. For more information, see the 301 origin analysis.

Effective July 6, 2018, the Office of the United States Trade Representative (USTRT) issued an advisory notice regarding the 301 origin analysis. The notice provides information regarding the 301 origin analysis and the date of this ruling. USTR's notice is available at <https://ustr.gov/about/bureaus-offices/office-of-trade-enforcement-and-compliance/301-origin-analysis>.

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Products of China classified under subheading 8508.11.00, HTSUS, unless specifically excluded, are subject to the additional 25 percent ad valorem rate of duty. At the time of importation, you must report the Chapter 99 subheading, i.e., 9903.85.00, in addition to subheading 8508.11.00, HTSUS, listed above. The tariff is subject to periodic amendment, so you should exercise reasonable care in monitoring the status of goods covered by the Notice cited above and the applicable Chapter 99 subheading.

In your letter, you state that the NextWave vacuum cleaner consists of several key modules and components, many of which are fabricated into module subassemblies in Thailand. These modules will then be further assembled into the NextWave chassis and integrated with the Main Printed Circuit Board (PCB) containing all the required operational software, resulting in the finished product. The manufacturing process includes the production of key module subassemblies in Thailand. These modules are significant components of the finished NextWave vacuum cleaner. Some of the module components are manufactured in China and shipped to Thailand.

The Main PCB and other modules undergo substantial manufacturing and assembly processes in Thailand, including soldering of components, extensive software programming, and rigorous testing.

Unlimited user-specific customizable 301 analysis templates

The chassis is assembled in Thailand, where the modules are integrated with the Main PCB and other components, resulting in the finished product.

Section 134.1(b), Customs Regulations (19 C.F.R. § 134.1(b)), defines "country of origin" as the country of manufacture, production, or growth of any article of foreign origin entering the United States. Further work or material added to an article in another country must effect a substantial transformation in order to render such other country the "country of origin."

Based on the information provided, the materials/components and subassemblies imported into Thailand from China are manufactured into different subassemblies and ultimately assembled into the subject NextWave vacuum cleaner. The processing performed in Thailand constitutes a substantial transformation of the imported materials/components into "products of" Thailand. The manufacturing process in Thailand transforms the Chinese-origin components to produce the finished product. It creates a new and different article of commerce with a distinct character and use that is not inherent in the components imported into Thailand. Therefore, the "product of" requirement has been satisfied. For tariff purposes, we conclude that the country of origin for the NextWave vacuum cleaner and its accessories, when imported together, will be Thailand.

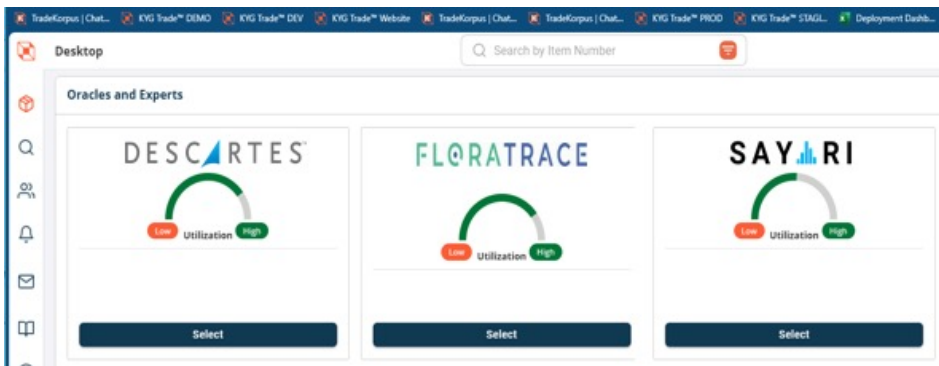


Country of Origin Determination

Section 134.1(b), Customs Regulations (19 C.F.R. § 134.1(b)), defines "country of origin" as the country of manufacture, production, or growth of any article of foreign origin entering the United States. Further work or material added to an article in another country must effect a substantial transformation in order to render such other country the "country of origin."

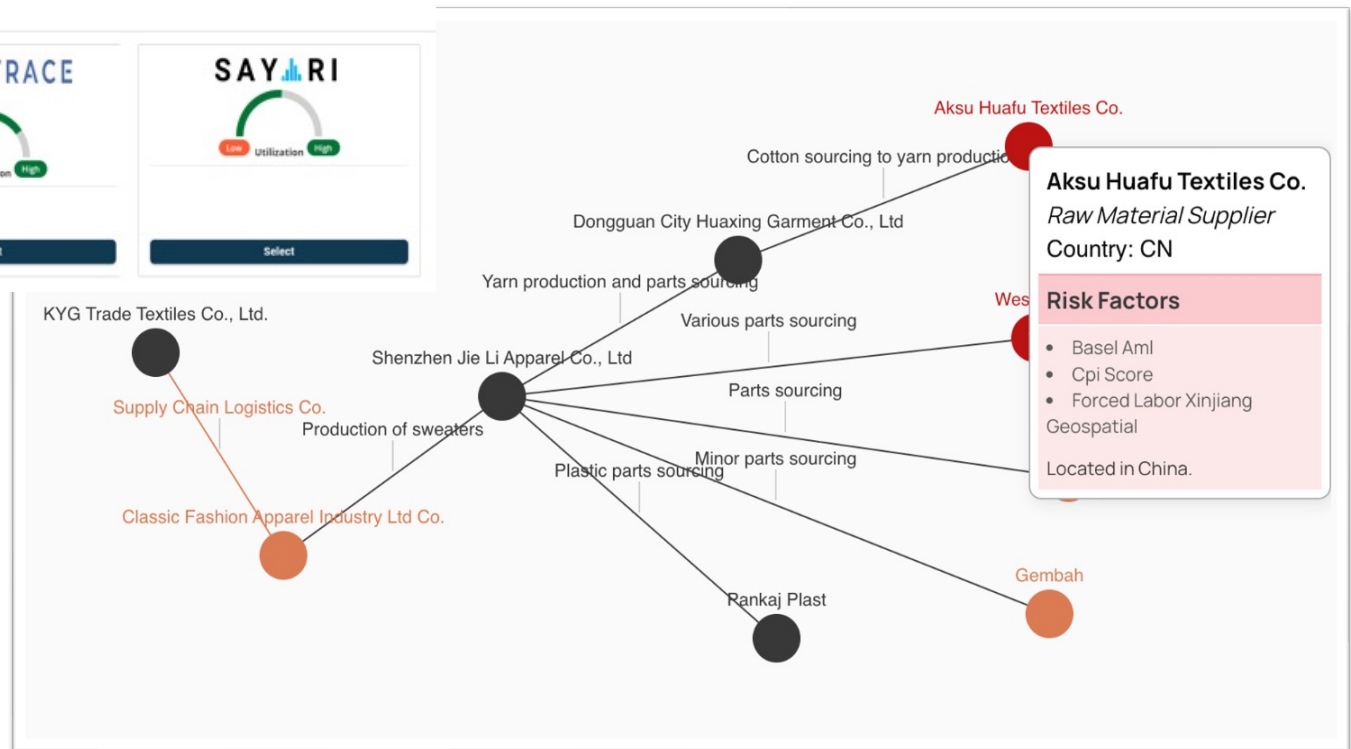
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AI-Assisted SKU-based UFLPA/Traceability Compliance



Tier N map” showing the roles of each entity identified in the BOM, shipment and transaction documents.

- Vendor risk factors are aggregated from various content providers.



AI-generated UFLPA Vendor Risk Assessment



We use AI to assist with aggregating and rationalizing data from multiple content providers for specific SKU-level analysis.

Supplier Risk

Microsoft User
user@microsoft.com

Ralls India Limited
Vinh Long Footwear Co.
HUAFU FASHION

KYGID 85901
Ralls India Limited

Supplier Background

Industry Chemical Industry

Supply Chain Roles Chemical Supplier. Examples of specific products provided include pesticides, disinfectants, detergents, and various inorganic acids, esters, and salts.

Expected Customer Profile Expected to sell primarily to entities in the chemical industry, including manufacturers of agricultural chemicals, industrial cleaners, and laboratories.

Expected Vendor Profile Upstream vendors primarily supply inorganic esters, acids, detergents, and pesticides.

Direct Forced Labor Risk

Direct Forced Labor Risk Level Low

Direct Forced Labor Risk Description N/A

Indirect Forced Labor Risk

Vendor / Supplier Risk Level High

Vendor / Supplier Risk Description Ralls India Limited's vendors, such as Limin Holdings Group Co., Ltd. (限民控股集团股份有限公司), Nanjing Hongtaiyang Co., Ltd. (南京红太阳股份有限公司), and Hubei Kingfa Chemicals Group Co., Ltd. (湖北天美化工集团股份有限公司), have notable risks associated with forced labor, especially in regions like Xinjiang. The products from these vendors, including various chemicals and pesticides, may be tainted by forced labor practices.

Vendor / Supplier List [View Entity List](#)

Associate Entity / Customer Risk Level Low

Associated Entity Risk Description N/A

Owner Risk Level High

Owner Risk Description Tata Chemicals Limited, a significant owner, has been linked to multiple forced labor risk, particularly connected to products sourced from high risk regions like Xinjiang. The ownership lies between Tata Chemicals Limited and Ralls India Limited indicate a potential for these risks to manifest in Ralls India's operations.

Other Risk Information

Direct Other Risk Description The entity has identified Basel AML risk, CPI score risk, and a high risk associated with exporting to SOEs.

Transactional Red Flags High risks related to exporting to sanctioned entities and state owned enterprises (SOEs). Additional risks include associations with entities flagged for forced labor and regulatory issues. Further transaction details are needed to identify specific transactional red flags.

Top 5 HTS Codes

- 3808 - Insecticides, rodenticides, fungicides, herbicides, antiscorbutic products and plant growth regulators, disinfectants and similar products, put up in forms or packings for retail sale or as preparations or articles (for example, sulfur treated bands, wicks and candles, and flypapers)
- 2933 - Heterocyclic compounds with nitrogen hetero-atoms) only
- 3402 - Organic surface active agents (other than soaps), surface active preparations, washing preparations (including auxiliary washing preparations) and cleaning preparations, whether or not containing soap, other than those of heading 3401
- 3401 - Soap; organic surface-active products and preparations for use as soap, in the form of bars, cakes, molded pieces or shapes, whether or not containing soap; organic surface-active products and preparations for washing the skin, in the form of liquid or cream and put up for retail sale, whether or not containing soap; paper, wadding, felt and nonwovens, impregnated, coated or covered with soap or detergent
- 2920 - Esters of other inorganic acids of nonmetals (excluding esters of hydrogen halides) and their salts; their halogenated, sulfonated, nitrated or nitrosated derivatives
- 9027 - Instruments and apparatus for physical or chemical analysis (for example, polarimeters, refractometers, spectrometers, gas or smoke analysis apparatus); instruments and apparatus for measuring or checking viscosity, porosity, expansion, surface tension or the like; instruments and apparatus for measuring or checking quantities of heat, sound or light (including exposure meters); microtomes; parts and accessories thereof

Sources Sayari, Descartes, Supply Trace

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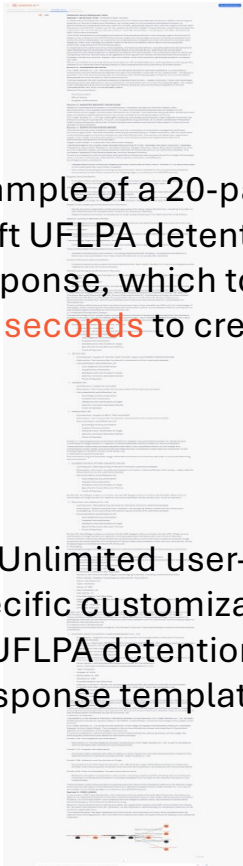
36




AI-generated “draft” UFLPA Detention Response

Example of a 20-page draft UFLPA detention response, which took **15 seconds** to create

Unlimited user-specific customizable UFLPA detention response templates



 **KAY**

Detention Notice Response Letter

Section 1: INTRODUCTION To Whom It May Concern,

In response to the Detention Notice issued by the U.S. Customs and Border Protection (CBP) concerning our shipment of Women's Cashmere Sweaters, we hereby submit this comprehensive documentation to demonstrate our compliance with the Tariff Act of 1930, specifically Section 307, and the Uyghur Forced Labor Prevention Act (UFLPA), Public Law 117-78, codified at 22 U.S.C. § 6901. These statutes collectively prohibit the importation of merchandise produced wholly or in part by forced labor, including convict labor, forced child labor, and indentured labor.

The UFLPA establishes a rebuttable presumption that goods produced in the Xinjiang Uyghur Autonomous Region or by entities on the UFLPA Entity List are made with forced labor and are, therefore, prohibited from entry into the United States. As importers, we understand our obligations under the UFLPA to conduct due diligence, trace, and manage our supply chains to ensure compliance, particularly concerning goods potentially originating from the Xinjiang region.

In response to the detention of our merchandise, we have several options, including demonstrating that the merchandise was not produced in the Xinjiang region or by a listed entity, rebutting the forced labor presumption with clear evidence, or opting to re-export the merchandise. This submission aims to clarify our compliance with the relevant laws and regulations and request the release of the detained merchandise. It includes transaction records, supply chain information, and other business-generated evidence to support our case.

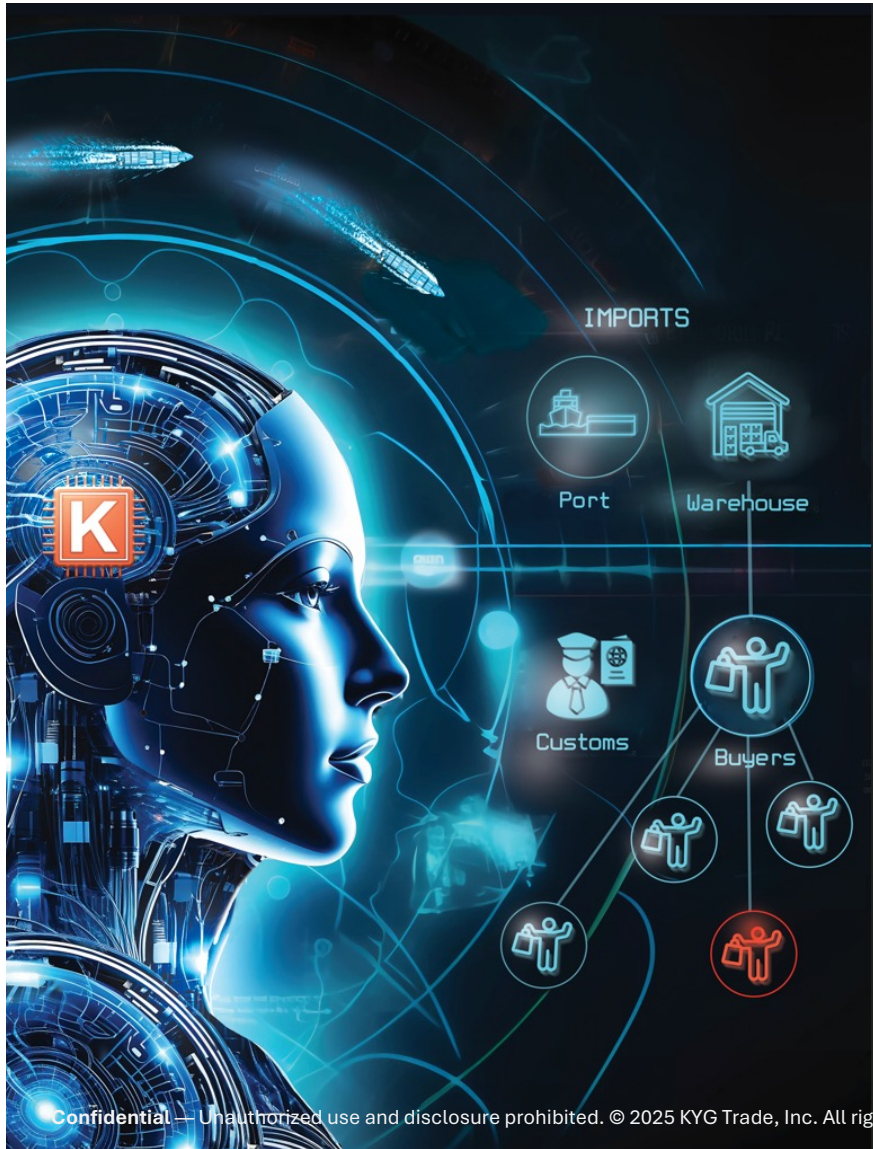
We are committed to ensuring clarity and compliance with all applicable laws and regulations and request the release of our detained merchandise based on the comprehensive documentation provided herein.

Section 2: STATEMENT OF FACTS

KYG Trade Textiles Co., Ltd., the importer of the detained Women's Cashmere Sweaters, is committed to ethical sourcing and vehemently opposes the use of forced labor in any part of our supply chain. The goods in question were not sourced, produced, or manufactured in the Xinjiang region of China, nor have they been associated with any entities on the UFLPA Entity List.



Additional Configurations and Data Storage



Confidence scores



| Kay's Question | | Result | Resources | Candidate List | | |
|--|------------|---------------|--|---------------------|---------------|--|
| Candidate | Confidence | Subheading | Description | General | Spe | |
| 5102.11.10.00 Of Kashmir (cashmere) goats.11 | 95% | 5102.11.10.00 | Not processed in any manner beyond the degreased or carbonized condition | 5.1c/clean kg null/ | Free (AU R. M | |
| 5104.31.00.00 Of Kashmir (cashmere) goats (4... | 94% | 5102.11.90.00 | Other | 4.9c/kg + 4% null/ | Free (AU R. M | |
| 5105.31.00.00 Of Kashmir (cashmere) goats (4... | 87% | 5102.19 | Other | - | - | |
| 5106.31.00.00 Of Kashmir (cashmere) goats (4... | 82% | 5102.19.20.00 | Hair of the camel | 5c/clean kg null/ | Free (AU R. M | |
| 5107.31.00.00 Of Kashmir (cashmere) goats (4... | 78% | 5102.19.60 | Other | 0.4% null/ | Free (AU R. M | |
| 5109.31.00.00 Of Kashmir (cashmere) goats (4... | 66% | 5102.19.60.30 | Hair of the Angora goat | cy kg | - | |



Tribal Knowledge-Base

--Comparison to Existing Classification--

The selected code 8414596560 matches the existing code provided by the client, confirming the accuracy of the classification.

--Comparison to Existing Classification--

The selected code does not match the existing classification, 8504409580, as previously determined by the client. The client-provided code is defined for static converters not intended for telecommunication apparatus or power supplies used with automatic data processing machines of heading 8471, among other exclusions. The differences between the two codes lie in the specific functions and intended uses of the items they cover. The selected code, 8504314065, is more appropriate for the item described because it accurately reflects the power supply's function as a transformer with a specific power handling capacity, aligning with the item's technical specifications and intended use with ADP machines.

The rationale for selecting this code is based on the General Rule of Interpretation (GRI) 1, which applies because the item description 'HARNESSED FORCED AIR BLOWER 5M' matches the specific language of the heading 841459. This heading includes various types of fans and blowers not classified under other specific subheadings. The item 'HARNESSED FORCED AIR BLOWER 5M' is best classified under HS code 8414596560 because it is a part of a forced air blower, which falls under the scope of this subheading. Historical classification of similar items, such as the [REDACTED] and the [REDACTED], supports this classification.

These items are also parts of blowers and have been classified under 841459. The item description does not indicate that it is excluded by any specific subheading exclusions, such as those for microprocessors, telecommunications equipment, or motor vehicles.

Several alternative codes were considered during the classification process. These include 8414596595, which would apply if the item were not a part of a forced air blower but rather a different type of fan not specifically excluded by the subheading; 8414596590, if the item were an axial fan component rather than a centrifugal fan component; 8414591000, if the item were a general fan part not specifically excluded by the subheading; 8414591500, if the item were specifically designed for cooling microprocessors, telecommunications equipment, or computers; 8414593000, if the item were a general fan part not specifically excluded by the subheading; and 8414596540, if the item were suitable for use with motor vehicles.



Collaboration

Streamline communication and data storage with internal compliance teams and external parties.

The screenshot displays a collaboration interface with two main panels. The top panel, titled "Collaboration", shows a list of comments. The bottom panel, also titled "Collaboration", shows an email interface with a list of supporting files.

Comments Panel:

- PM** Add a comment...
- PM** Peyton Montei a few seconds ago [Product 33986](#)
@Sabrina Smith can you review the HTS and ECCN classification?
Edit
- KA** Kay AI 16 hours ago [Assessment 29800](#)
Based on the information provided, the most likely HS code for the women's cashmere sweater known as the Cashmere Jet Set Crew, made from 100% cashmere yarn. It features a fine gauge centimeters, indicating high-quality craftsmanship. The sweater is designed with a high, ribbed two large, ribbed pockets on the front, contributing to a relaxed, oversized fit. The color of the it sweaters/pullovers. The legacy country of origin for this product is Jordan, and it falls under the classification of 6110121020. The item number for this product is 4838349, and it is specifically classification code, 6110121020, applies to articles of apparel and clothing accessories, knitted sweatshirts, waistcoats (vests), and similar articles made entirely of cashmere. The rationale fo as the item's composition of 100% cashmere yarn, which aligns with the description under HS : per two centimeters is consistent with the definition of a sweater, which allows for fewer than 11 this subheading include similar items, such as women's pullovers and sweaters made of cashr like J89995 (2003-10-30) and J87263 (2003-09-04) have classified similar items under this cod classification is GRI 1, which states that classification shall be determined according to the tern chapter notes. This rule is fundamental in ensuring that the classification is based on the precis nomenclature. During the classification process, key questions included whether the item was ; definition of a sweater based on stitch count. The answers confirmed that the item was indeed with sweater definitions, leading to the selection of the appropriate HS code. Other potential six 611020, and 611090. However, these were not selected as they did not specifically cover wom the defining characteristic of the item in question. --Comparison to Existing Classification-- The 6110121020, provided by the client.

Emails Panel:


- Activity on: Current KYGID™ (33986)
- Search: Search...
- Compose
- Inbox
- Sent
- Archive
- Supporting Files: Shipping Docs, Cashmere sweater BOM.pdf, Cashmere Sweater Document Package_Redacted.pdf

Record-keeping & Immutable Storage



All changes and collaborations are recorded in real-time.

- Emails, PDFs, attachments, stored at the product level
- Internal and external communication across the supply chain
- Changes and updates to product data



Page 1

Item Name: Cashmere Sweater for women
 Item Number: 4838349-test
 Item Rev: 1
 KYGID: 74303
 Import Jurisdiction: United States
 Export Jurisdiction: United States

Attestation ID: 30070
 Attestation Category: Reassessment
 Attestation Type: HS
 Attestation Reason: New Item
 Attestation Completion: 2024/11/21

...wed the attributes and other relevant information, if any, for the item described herein, as detailed in Appendix A. Based on the information reviewed, KYGTrade has made the appropriate compliance determination(s):

...on: 6110121020


 Signature
 Name: Peyton Monte
 Title:

...on represents the professional opinion of KYGTrade regarding the item described herein. If any of the item attributes have materially changed since the date this attestation was completed, additional analysis and/or an updated attestation may be required

Collaboration
Activity on Current KYGID™ (33986)

Comments
Emails
Changelog
Supporting Files
Notifications
Participants

Oldest first
IF

SS Sabrina Smith created a product 2024-05-09 12:45:02 Product 33986

SS Sabrina Smith changed product Revision attribute 2024-05-09 12:45:03 Product 33986

N/A → 1

SS Sabrina Smith changed product Item Name attribute 2024-05-09 12:45:03 Product 33986

N/A → Cashmere Jet Set Crew

SS Sabrina Smith changed product Item Description attribute 2024-05-09 12:45:03 Product 33986

N/A → 100% cashmere sweater

SS Sabrina Smith changed product Item Number attribute 2024-05-09 12:45:03 Product 33986

N/A → 3588235

Load more (5/70) changelogs

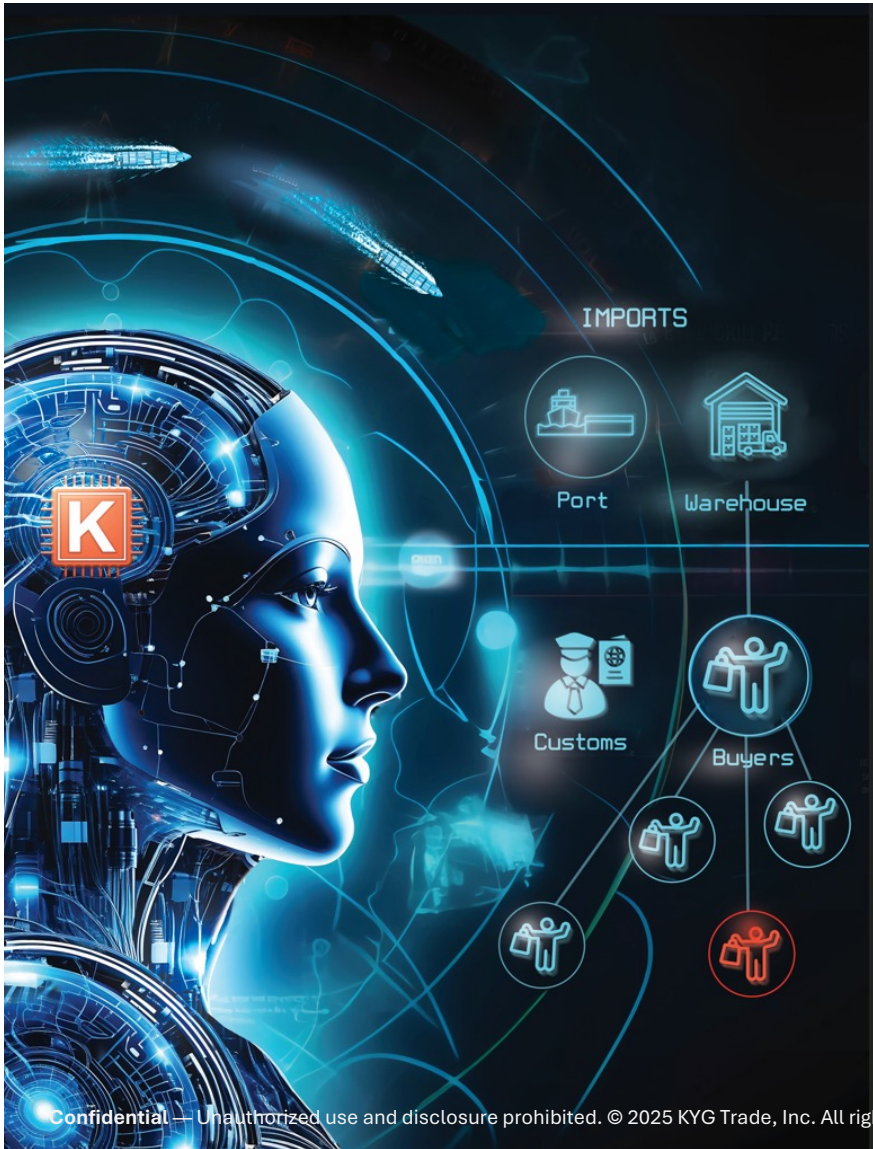


Real-time Monitoring

Changes and updates to trade regulations and requirements are flagged in the KYG Trade™ Platform.

| P | KATID | Document Type | Jurisdiction | KYGID™ | Item Name | Item Number | Workflow Stage | Assignee | Attestation Modification Date | Status | Actions |
|---|-----------------------|---------------|---------------|-----------------------|-----------------------|-------------|----------------|----------|-------------------------------|-----------|---------|
| ▼ | 24864 | HS | United States | 33986 | Cashmere Jet Set Crew | 4838349 | Conductor | | 2024-07-16 13:47 PDT | Suspect ▼ | |

- HTS Code Updates
- Duty Rate Modifications
- Export Control List Updates
- License Requirements
- Rules of Origin
- Forced labor laws
- Sustainability and Environmental Requirements
- Sanctions and Restricted Party Screening
- Free Trade Agreement (FTA) Updates
- Anti-Dumping and Countervailing Duties (ADD/CVD)
- Product Safety and Regulatory Standards



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Contact Us

Thank You

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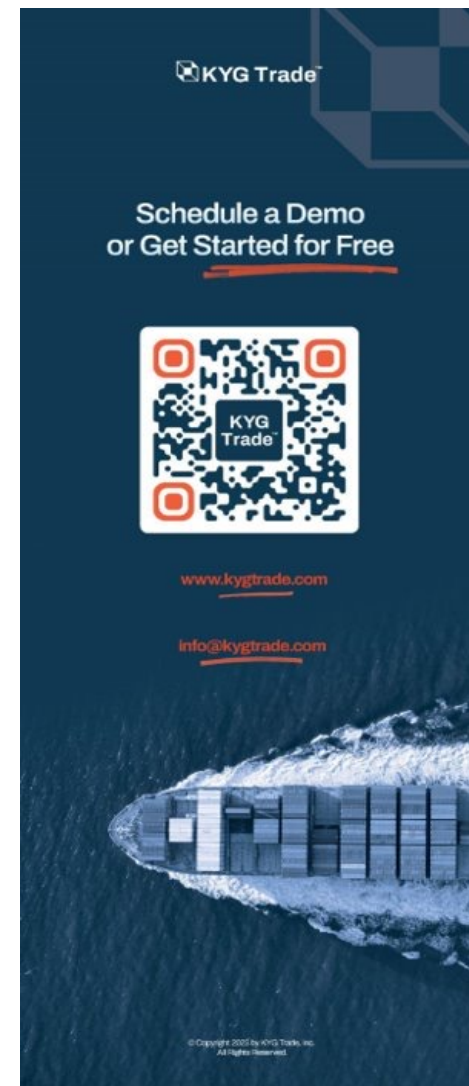
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U.S. Patent # 17/512,223 Notice of Allowance Received



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