Amazon Meeting Log
08/29/2024

Attendees:

Jim Joholske	Consumer Product Safety Commission (CPSC)
Sabrina Keller	Consumer Product Safety Commission (CPSC)
Arthur Laciak	Consumer Product Safety Commission (CPSC)
Kat Rickerson	Consumer Product Safety Commission (CPSC)
Mary House	Consumer Product Safety Commission (CPSC)
Brittany Forrest	Amazon
Matt Pope	Amazon
Ryan Radford	Amazon
Courtney Gayle Taylor	Amazon
Marcia Tovares	Amazon

SUBJECT: Amazon eFiling Meeting

DATE OF MEETING: 29 August 2024

LOG ENTRY SOURCE: Arthur Laciak, EXIS

LOCATION: Virtual Web meeting

SUMMARY OF MEETING: Amazon requested a meeting with EXIS to discuss potentially participating in the eFiling voluntary stage with their 1st party retail products. Amazon asked EXIS technical and programmatic questions.

I. **Introduction**

- Amazon expresses that eFiling is modernizing the process of providing certificate information, transitioning from maintaining certificates in PDF formats and instead maintaining certificates in a data format.
- Amazon has already been speaking with other Beta Pilot participants and their brokers about participation.
- EXIS agrees with Amazon's remarks and reiterates that eFiling is only changing the process of providing certificate information and does not change which products require certification.

II. **Discussion**

- Amazon asks about the difference between the Beta Pilot and Voluntary Stage, whether there will be capacity, and how to join the waitlist.
  - EXIS states that the Voluntary Stage is just an extension of the Beta Pilot and the waitlist is first-come-first-served. Amazon expressed concern about CPSC's ability to handle their volume, and EXIS expressed that its developers can manage the capacity of certificates, if Amazon participates.
- Amazon asks about the advantages of using the Reference Message Set over the Full Message Set. Amazon asks about how manufacturers can enter data into the Product Registry and whether CPSC will regulate who can access an importer's Business Account.
  - EXIS explains that the Reference Message Set is most useful for products that are repeatedly imported under the same certificate and gave more details about using the certificate identifiers. EXIS explains that the importer will manage users invited to their Business Account and CPSC will not regulate who can access.
- Amazon recommends creating a means for manufacturers who sell to multiple importers to upload manufacturer information, which importers can incorporate in their certificates.
  - EXIS appreciates the suggestion and will consider it for a future development.
- Amazon asks about current feedback from participants and any pinch points. Amazon mentions that participants' shipments are being held up at import.
  - EXIS expresses that many brokers made mistakes entering the certificate identifiers in the Reference Message Set and EXIS has found mistakes when validating certificates, such as incorrect lab test date. EXIS encourages Amazon to build in a validation step when creating certificates.
  - EXIS states that participants' shipments will not be held up at import, if there are eFiling errors. EXIS believes that importers are confusing the Two-Way Messaging "Under Review" time as a hold.
- Amazon asks about how CPSC identifies HTS codes and the cadence of providing updates.
  - EXIS reviews the HTS chapters related to CPSC-regulated products. EXIS monitors the U.S. International Trade Commission website for any updates and encourages importers to report to CPSC any HTS codes missing from the HTS flagging list.
- Amazon asks about the rationale behind requiring citations to ASTM F963 subsections and asks whether labs have managed this requirement.
  - CPSC always required citations to ASTM F963 subsections, but importers may have not been aware, because certificates were not standardized before. EXIS also notes that the subsections apply to different types of toys. EXIS has not heard any difficulties from labs.