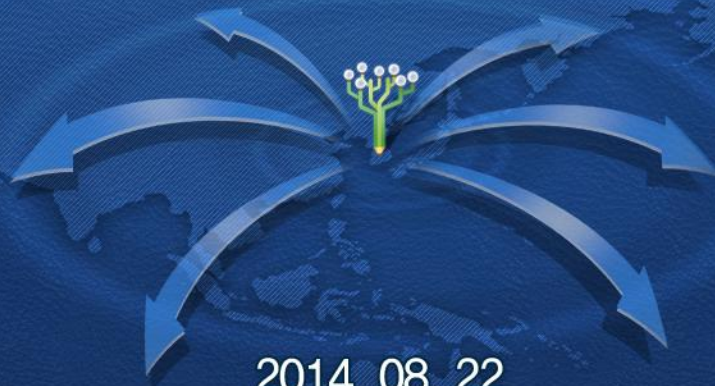


원산지 검증 뒤엎은 한판 승부



2014. 08. 22



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관세청 종합 솔루션
YesFTA



KOH
YOUNG
TECHNOLOGY
INTELLIGENT
INSPECTION

고영테크놀러지는 이런 회사입니다



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YesFTA

세계 수준의 Mechatronics 기술을 보유한

Machine Vision기술, 지능형시스템 Software기술, 정밀기계설계 기술을 조화롭게 구사하는 기업



Zenith

혁신적인 3차원 측정 기반의 3D AOI

aSPire2

업계유일의 4방향 프로젝션을 이용한
세계최고 정밀도의 3차원 자동 인쇄검사기

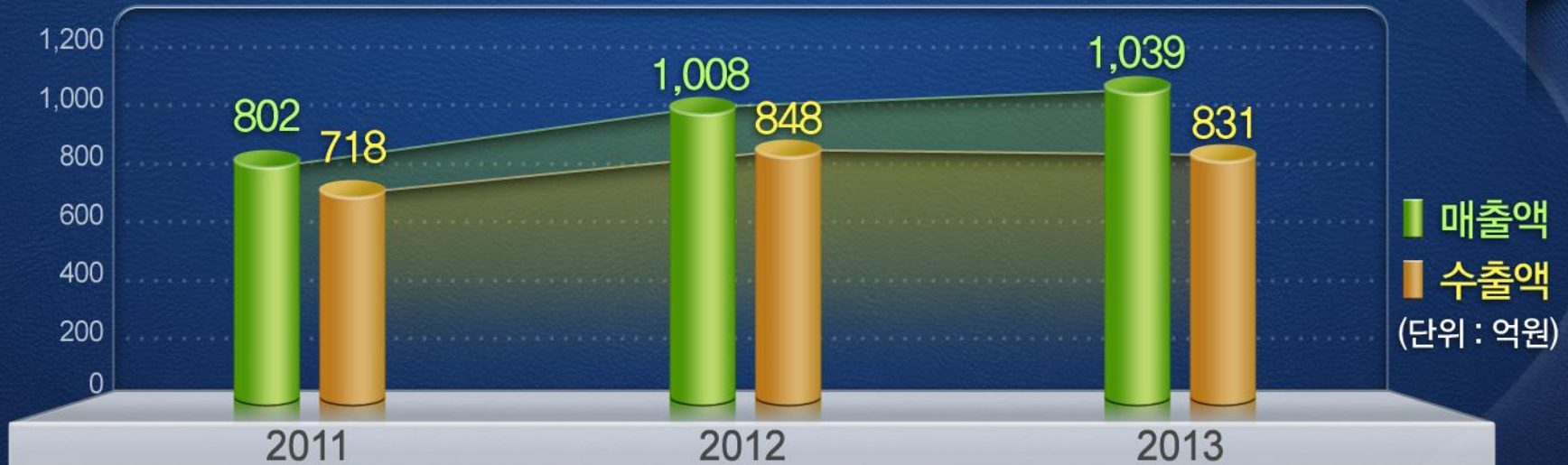


KY8030-2

대량 생산라인에 최적화된
2방향 프로젝션 3차원 자동 인쇄검사기

KY8030-3

고속 고효율 생산공정의 효율향상을 위한
2방향 프로젝션 3차원 자동 인쇄검사기



매출액 대비 수출 비중 **85%**



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원산지 검증



2012. 03. 15 한미 FTA 발효

ASPIRE2 (제 9031.49-9000호) 원산지 증명서 자율 발급

관세율 : 3.5 % → 0 %

한-미 FTA 발효로 인한 관세 인하 효과

₩342,626,000 절감 (2013년 기준)

한-미 FTA로 인한 매출액 증대 효과



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원산지 검증





CBP FORM 28



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

REQUEST FOR INFORMATION
19 CBP 151.11

OMB No. 1551-0023, Exp. 5-31-2011

3. Manufacturer/Exporter/Shipper
4. Carrier

5a. Invoice Description of Merchandise
5b. HTSUS Item No.

6. Customs Broker and Reference or File No.

7. Date of Report
8. Date of Entry and Importation
9. Entry No.
10. HTSUS Item No.

11. Date Information Furnished

12. Please Furnish (Indicate by ☐)
Copy of contract (or purchase order and seller's confirmation thereof) covering this transaction, and any transaction thereto.
Description or illustrative literature or information explaining what the merchandise is, where and how it is used, and exactly how it functioned.
Breakdown of components, subunits, or ingredients by weight and the actual cost of the components at the time of assembly into the article.
Subunit samples: Article number and description
from container number
mark(s) and number
Sample consumed in analysis, and other samples whose return is not specifically requested, will not normally be returned.
See item 14 below.

13. If you are related, please describe the relationship between you and the Manufacturer/Exporter/Shipper.
If this relationship affects the price paid or payable for the merchandise, such as:
☐ family
☐ ownership
☐ partnership
☐ other business relationship

14. CBP Officer's
Signature
Special Agent in Charge

15. Reply Message (Use additional sheets if reply space is needed.)



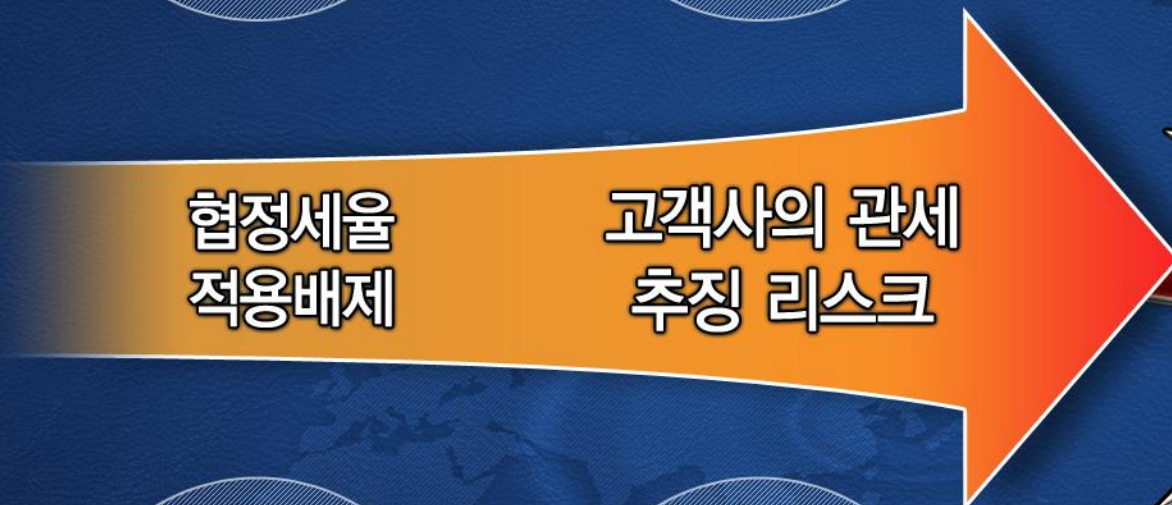
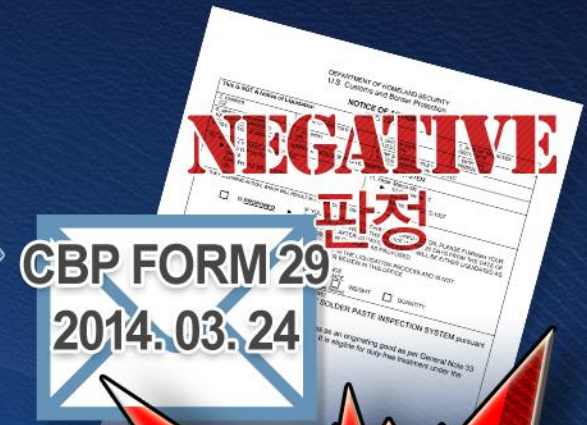
이게 뭐지?



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원산지 검증

관세청 종합 솔루션
YesFTA



Measure to Optimize:
A Complete 3D Inspection Solution



Customer Satisfaction
Every Step of the Way



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어떻게 대응하지?



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원산지 검증

관세청 종합 솔루션
YesFTA



왜 Negative를 받았는가?

CBP Form 29

- ✓ 품목별기준(PSR) 충족 근거 불충분
- ✓ 제출서류 영문화 미비

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

NOTICE OF ACTION
19 CFR 152.2

This is NOT A Notice of Liquidation

2. CARRIER: KR
3. DATE OF NEGOTIATION: 10/16/2013
4. DATE OF ENTRY: 03/24/2014
5. ENTRY NO.: NJ75007239
6. CBP OFFICE AND FILE NO.: MTI WAKJLWIDE LOGISTICS CORPORATION

7. COUNTRY: KR
8. CBP OFFICE AND FILE NO.: MTI WAKJLWIDE LOGISTICS CORPORATION

9. DESCRIPTION OF MERCHANDISE: Solder Paste Inspection System

10. TO: [REDACTED]

11. FROM: Laura Rosenberger
6801 NW 25th St
Miami, FL 33122-2232
US

12. THE FOLLOWING ACTION, WHICH WILL RESULT IN AN INCREASE IN DUTIES, IS PROPOSED:

☐ IS PROPOSED

☒ HAS BEEN TAKEN

IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASON IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS, YOUR ENTRY WILL BE OFFERED LIQUIDATED AS PROPOSED ON CHANGED AS PROPOSED.

THE ENTRY IS IN THE U.S. CUSTOMS AND BORDER PROTECTION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THE OFFICE.

TYPE OF ACTION: A. VALUE ADJUSTMENT B. DUTY ADJUSTMENT C. OTHER ADJUSTMENT

13. REASON FOR ACTION: The documentation submitted in response to our request for information and proposed notice of action fails to substantiate that the merchandise is eligible for preferential tariff treatment pursuant to the United States-Korea Free Trade Agreement (USKFTA) rule of origin in General Note 33 to the Harmonized Tariff Schedule of the United States. The HTS number applicable to the Solder Paste Inspection System is 8537.49.9000 with corresponding duty rate of 3.5%. See CROSS Ruling N167179. The entry has been liquidated with an increase in duty. Please note that our review revealed the following deficiencies in the submitted supporting documentation:
*Failed to support how the merchandise meets the product specific rule (CTSH + RVC (GN33(O)).
*Failed to support how the 45% build-down method applies (costs, linkage to each invoice were submitted in Korean).
*Raw material invoices, bill of materials and many supporting documents were submitted in Korean. All documentation submitted must be in English.
You have the right to appeal the liquidation of the entry listed in this notice pursuant to 19 USC 1514 and 19 CFR 174. A Bulletin Notice of Liquidation will be posted at the Custom house where the entries were filed. Your appeal rights are allowed for 180 days after the Bulletin Notice of Liquidation is posted. Appeals filed prior to liquidation will be denied as untimely.

14. OFFICER (PRINT OR TYPE): Rosenberger

15. TEAM DESIGNATION: 487

16. TELEPHONE NO.: 305-969-2895

CBP Form 29 (11/13)



신한관세법인

SHINHAN Customs service inc.



원산지 검증



대응방법은?

■ CBP FORM 28에 대한 면밀한 분석

- 원산지 증명서
- HS CODE, 원산지, 원재료비가 기재된 BOM 및 원재료 송장
- 비원산지 재료에 대한 원산지 입증 증명서 또는 진술서
- 원가 자료 (원산지 결정기준이 역내가치기준 충족을 요구하는 경우)
- 생산 제조기록, 구성품의 원산지 국가를 보여주는 제조 공정도 등 기타 자료



- 송품장에 기재된 가격에 대한 정보
- 미국 내 과세가격에 대한 증빙서류
(거래가격 배제 조건에 대한 증빙)



신한관세법인

SHINHAN Customs service inc.

원산지 검증





품목별 원산지 기준 (PSR)의 재 검토

〈제9031.49호 원산지 결정기준〉

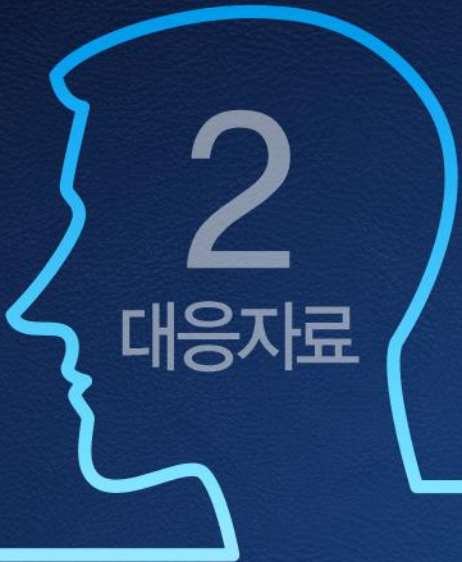
3차원측정기(coordinate measuring machines)
다음 각 목의 어느 하나에 해당하는 것에 한정한다.

가. 다른 호에 해당하는 재료로부터 생산된 것 (CTH)

나. 다른 소호에 해당하는 재료로부터 생산된 것.
다만, 집적법의 경우 35%, 공제법의 경우 45%
이상의 역내 부가가치가 발생한 것에 한정한다.
(CTSH + BD45)

다. 다른 물품(같은 소호의 물품을 위한 베이스 및
프레임은 제외한다)으로부터 생산된 것





품목 분류 의견서 제출

2
대용자료

A010-110000-001 / MAIN AIR ASS'Y



Name	MAIN AIR ASS'Y
HS CODE	8481.20
Material	PLASTIC AND STEEL
Explanation of function	MAIN AIR ASS'Y consists of an On/Off switch to input compressed air from a pump to an machine and a valve to regulate the quantity of compressed air

Classification

- Note 2 (a) to Section 16 states that Parts which are goods included in any of the headings of Chapter 84 or 85 (other than headings 84.09, 84.31, 84.48, 84.66, 84.73, 84.87, 85.03, 85.22, 85.29, 85.38 and 85.48) are in all cases to be classified in their respective headings and also second part of General (II) to Section 16 indicates that taps, cocks, valves, etc. (heading 84.81) are in all cases classified in their own appropriate heading even if specially designed to work as part of a specific machine.
- The Explanatory Notes to Heading 8481, HTS indicate that Valves for oleohydraulic or pneumatic transmissions. These valves, which may be of any type (pressure-reducing type, check type, etc.), are used specifically in the transmission of "fluid power" in a hydraulic or pneumatic system, where the energy source is supplied in the form of pressurised fluids (liquid or gas).
- The subject good is a regulator to control the air pressure. Therefore it would be classified in subheading 8481.20, HTS.

1



✓ 원재료(52개)의 영문 품목분류 의견서 제출



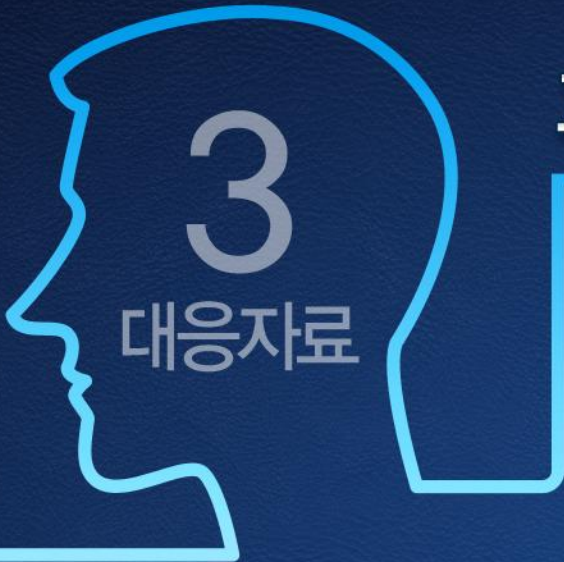
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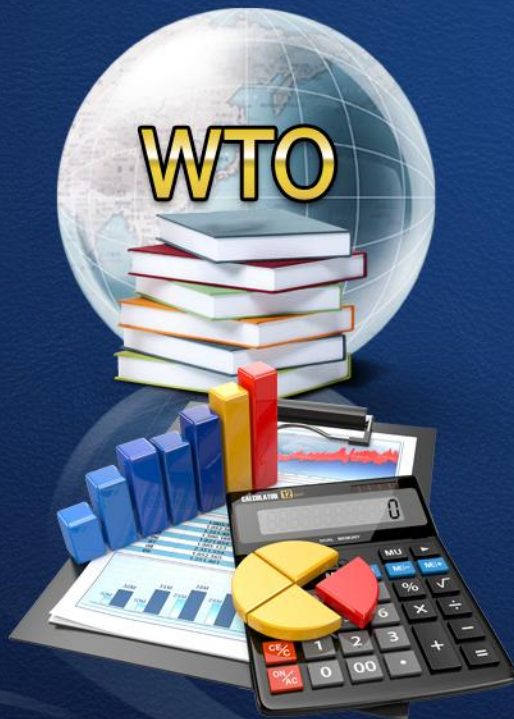
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과세가격에 대한 증빙

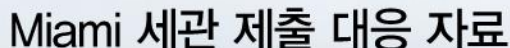


- ✓ 거래 관계 파악
- ✓ 유사한 사례 분석
- ✓ WTO 사례 근거로 제시



대응자료

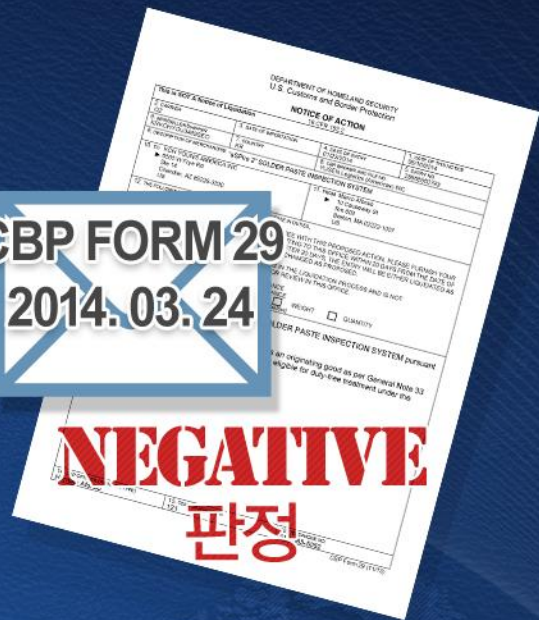
✓ 모든 제출 서류의 영문화 작업





CBP FORM 29

2014. 03. 24



CBP FORM 29

2014. 06. 16



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원산지 검증



앞으로는 원산지 관리를 어떻게 해야 되지?



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원산지 검증



PROTEST

MILAMI
2014. 01. 21

자체대응

CBP FORM 29
2014. 03. 24

NEGATIVE
판정

PROTEST
이의신청



원산지 관리 시스템 도입 및 내부 TFT 구축



기 존

- Tracking Number 추적을 통한 원산지 관리 (수기 관리)
- 해외영업팀 주도하의 원산지 관리



변 경

- 기업 내부 ERP와 원산지 관리 시스템의 연계
- 회사 TFT 구성을 통한 전사적 원산지 관리



시사점

- CBP FORM 28 수취 시 면밀한 검토 필요
- 미국세관에서 서류를 심사한다는 것을 명심
- 원산지 판정 단계에서부터 입증 서류를 체계적으로 관리
- 원산지 검증은 한번으로 끝나는 것이 아님



THANK YOU

We make the Difference
For your Successful Business.



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YesFTA