

CBMA Importer Claims

- Addressing Common Errors -

DECEMBER 19, 2023



This information is being presented to help the public to understand and comply with the laws and regulations that the Alcohol and Tobacco Tax and Trade Bureau (TTB) administers.

It is not intended to establish any new, or change any existing, definitions, interpretations, standards, or procedures regarding those laws and regulations.

In addition, this presentation may be made obsolete by changes in laws and regulations.

Please consult the applicable laws and regulations for the most current requirements.

Sample documents (such as records, returns, and labels) are for illustrative purposes only and contain fictitious data.



Common errors when:

- Activating an entity in myTTB.
- Filing a CBMA claim under the regular procedure.
- Filing a CBMA claim under the alternate procedure (manual claims).
- CBMA claim payment is canceled.
- Q&As.



myTTB Entity Activation – Helpful Links

- To Activate an Entity on myTTB https://www.ttb.gov/myttb/activate-entity
- To Add Users to an Entity on myTTB https://www.ttb.gov/myttb/entity-managers
- To Make Permits Online (PONL) Amendments
 TTBGov How to Amend an Approved Permit, Registration, or Notice
- To Make Permits Online (PONL) Key Contact Designations https://www.ttb.gov/ponl-help/designate-key-contacts



Common errors when activating an entity in myTTB

Problem	Solution
Can't sign into Login.gov / ID.me	Contact Login.gov or ID.me directly. TTB does not have access to
	their systems.
	Login.gov contact: https://www.login.gov/contact/
	ID.me contact: https://help.id.me/hc/en-us
Can't verify my identity on Login.gov	Contact Login.gov directly. TTB does not have access to their
	systems.
Can't activate the Entity on myTTB	Ensure that you are the Key Contact (Officer or Owner) for your
	Entity in Permits Online (PONL) .



Common errors when activating an entity in myTTB

Problem	Solution
I am not getting the myTTB access code	myTTB System will send the access code to the Key Contact's
	(Officer or Owner) email in PONL.
My access was revoked	TTB determined that you have gained access to the Entity's myTTB
	through the wrong authorization channels.
How to gain authorized access?	* Initial myTTB activation must be done by an Entity's Key Contact
	(Officer or Owner).
	* Initial myTTB role delegation must be done by the Entity's Key
	Contact (Officer or Owner).
	* If the Key Contact (Officer or Owner) designated an additional
	myTTB Entity Manager, this Entity Manager will be able to add new
	myTTB users and delegate Importer Claims System roles to them
	(Submitters or Preparers).
My access was put on hold	Your identity did not match the information we have for the Key
	Contact (Officer or Owner). We will contact you via e-mail.



Common errors when activating an entity in myTTB

Problem	Solution
I filed a claim before my access was revoked	No. Any claims filed by an unauthorized user will be rejected.
due to me being an unauthorized user. Is the claim going to be processed?	
An authorized employee that is no longer	Yes. TTB will verify the date on which the claim was filed and the
working for the Entity filed a claim and the	date on which the Entity's employee's access was removed.
Entity now has removed their access to myTTB	
System. Is the claim going to be processed?	

Common errors when filing a claim under the regular procedure

The data entered in ACE is not complete and correct.

Complete and correct information may include:

Entry Summary Number	Entry Summary Line Number	Entry Date
Importation Date	Entry Type Code	Importer Number
Importer Name	Manufacturer ID	Manufacturer Name
HTS Number	Line Tariff UOM Code	Line Tariff Quantity
Internal Revenue Tax Amount	Line Product Claim Code	Foreign Producer ID
Foreign Producer Name	Flavor Content (If Any)	Rate Designation Code
TTB Tax Rate	TTB Permit	Others

- If information submitted on ACE it is not complete and correct, submit an ACE Post Summary Correction (PSC) and allow time for the revised data to update in the myTTB system (typically within 48 hours).
- -The TTB Importer Permit Number cannot be updated in ACE once an entry summary is filed. The TTB Importer Permit Number is necessary to link an importer's entry data to the myTTB CBMA importer refund claims system. Importers will receive a warning in ACE if the TTB Importer Permit Number entered is not valid. Importers who receive this error should correct the TTB Importer Permit Number before proceeding.



File Manual Claim Using the CBMA Claims Alternate Procedure - Helpful Links

- To File a Manual Claim using the CBMA Claims Alternate Procedure https://www.ttb.gov/images/alcohol/cbma-imports/cbma-generate-ACE-report.pdf
- TTB CBMA ACE Report (Manual Claim Excel Spreadsheet)
 https://www.ttb.gov/images/cbma-imports/excel-template.xlsx
- CBMA Rate Designation Codes
 https://www.ttb.gov/images/pdfs/cbma/ACE CBMA Tax Rates Table.pdf
- TTB Industry Circular 2023-1 Alternate Procedure for Submission of CBMA Importer Claims https://www.ttb.gov/industry-circulars/ttb-industry-circular-2023-1



Filing a Manual Claim Under the Alternate Procedure

Alternate Claims Procedure Scenario	Required Documents
Alcohol Imported Prior to 2023 but Entered for	* The TTB CBMA ACE Report; and
Consumption in 2023 or Later	* For the year of importation, the CBP-required:
	- CBMA Spreadsheet;
	- Controlled Group Spreadsheet; and
	- Assignment Certification.
	See CSMS #50484790 – CBMA – 2022 Procedures and Requirements
	(GovDelivery.com) for CBP requirements for prior years.
Missing or Incorrect TTB Importer Permit Number	* The TTB CBMA ACE Report (with the corrected permit number); and
	* A statement identifying the deficiency with the permit number in the
	ACE data and confirming the correct permit number for the
	importation(s).
Entry Liquidated with Missing or Incorrect Data	* The TTB CBMA ACE Report (with corrections to missing or incorrect ACE
(other than the TTB Permit Number)	data); and
	* A statement explaining what data was missing or incorrect in the
	liquidated entry or entry summary (which has been added or corrected in
	the TTB CBMA ACE Report).



Filing a Manual Claim Under the Alternate Procedure

Alternate Claims Procedure Scenario	Required Documents
System Error	* The TTB CBMA ACE Report; and either
	* A statement explaining that the entry line does not appear in the CBMA
	Importer Claims System, or
	* A statement explaining that the entry line appears in the CBMA
	Importer Claims System with information inconsistent with ACE and
	identifying the information that is erroneous in the CBMA Importer
	Claims System.

Notes: Determine which scenario your entries belong to and collect all the documentation required before trying to file an alternate claim.

- A TTB CBMA ACE Report is needed in all cases
- The scenario for Alcohol Imported Prior to 2023 does not require a statement, but to add one as a supporting document could be useful to TTB.



Common errors when filing a manual claim under the alternate procedure

Corrupted CSV files and/or wrong formats.

Examples:

- Trailing commas. Saving an Excel file as a CSV file can create extra commas at the end of each row. Trailing commas can result when columns are deleted or column headers are removed.
- Wrongly formatted numbers. Some values turned into dates or text and vice versa.
- Leading zeros have been erased.
- Numbers appearing as a scientific notation.
- Total calculated for the line tariff quantity, internal revenue tax amount or the claim amount.

The example shows the trailing commas and totalization errors.



Common errors when filing a manual claim under the alternate procedure

No supporting documentation.

The documentation required by TTB to file a CBMA claim using the alternate procedure was not uploaded.

Unauthorized submitter.

The claim was submitted by someone who was not authorized by the importer or who did not obtain authorization from the importer through the proper authorization process.

Invalid estimated tax amount.

The estimated tax amount has to be retrieved from CBP's ACE System.



Common errors when filing a manual claim under the alternate procedure

- Controlled group over-assignments.
 - A foreign producer in a controlled group have made assignments beyond the tax tier quantity limit.
- Entries claimed belong to a different quarter.

 Ensure entry summary lines correspond to the quarter. File separately for every quarter.
- Entries available for a regular claim were submitted using the alternate procedure.
 Entry summary lines available to claim under the regular claim procedure should not be filed using the alternate procedure.
- Entries previously claimed.
 - Do not refile a claim for an entry summary line before you get a resolution on the first submission. Allow TTB to complete the first submission and then refile if needed.



Common errors when a CBMA claim payment is canceled

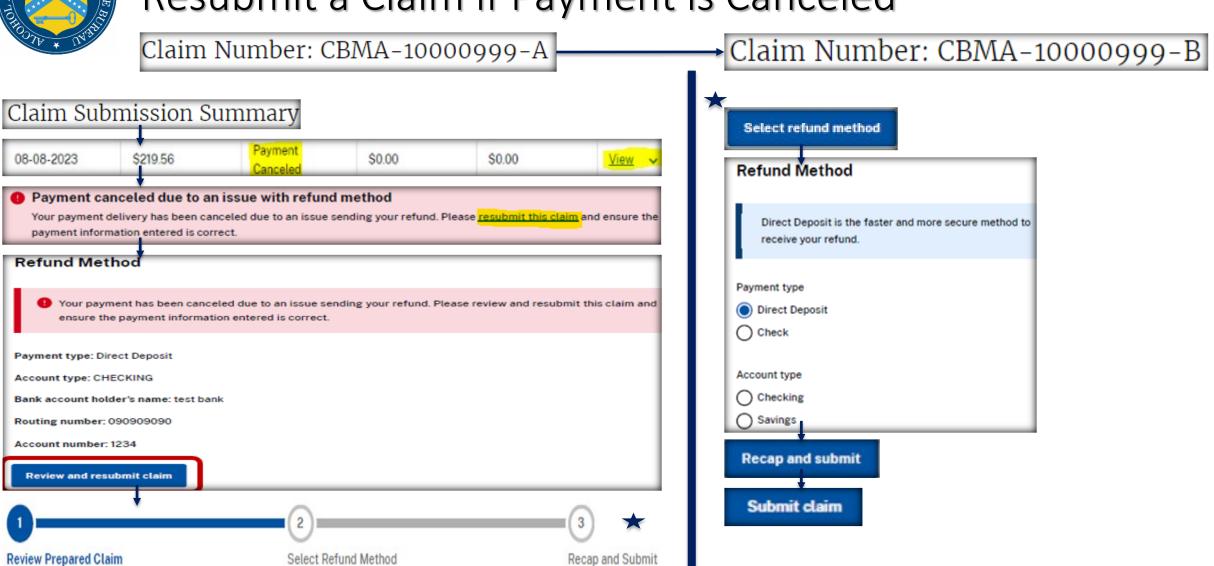
TTB may cancel payment of a refund due to:

- Incorrect direct deposit information
 - A wire routing number was entered for the refund
 - The wire routing number, still technically an ABA routing number, is a 9-digit code. You'll need to check directly with your bank what number you should give it might be the same as the ACH number and/or the routing number on your checkbook, but it might not.
- Check was returned by mail to TTB

In these situations, you will need to resubmit the claim with corrected payment information for payment to be reissued.



Resubmit a Claim if Payment is Canceled





Q&As

- THANK YOU -