# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0147** (RTC-54900) |
| **Related Incident ID** | IM445413 |
| **RFC Initiator / Organization** | NA-DE, TAXUD/B3, CUST-DEV3 |
| **CI** | **NCTS-P5 (DDNTA-v5.14.1-v1.00– CSE-v51.6.0)** |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | |  | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes No** |

***Change Summary***

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| **NCTS-P5 (DDNTA-v5.14.1-v1.00 - CSE-v51.6.0): Update of Appendix K for Rules R0107, R0983, R0990 & R0994 (No validation by Recipient).** |
| In the context of ieCA Real Time Exercise, rejections in several messages regarding the R0983 were identified during the upgrade conversion.  The optimum solution in order to avoid similar rejections in operations during the Transitional Period is to introduce a BRT to ensure that Common Domain messages will not be rejected. This approach will be valid until the completion of the L3 movements (endL3Date)  The same approach will be followed for Rules R0107, R0990 & R0994.  In addition, new BRTs will be created so that to de-activate R0107, R0983, R0990, R0994 respectively during Transitional Period. These BRTs will be applied in Common Domain Messages.  Furthermore B1836 shall be removed from the external domain messages CC013C, CC015C in order to reassure that C0030 will be validated in declaration messages initiated during transitional period in NCTS.P5 |

**Section 2: Problem Statement**

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| In the latest version of the CSE deliverable (NCTS-P5 DDNTA-v5.14.1 based on CSE-v51.6.0), the following updates shall be performed, based on the findings of the ieCA Real Time Exercise.  More specifically, rejections in several messages regarding the R0983, R0107, R0990 and R0994 were identified during the upgrade conversion due to the fact that in legacy phase (NCTS.P4) restrictions related to the quality of data where omitted.  In order to avoid rejections during the Transitional Period for the above mentioned Rules new BRTs will be introduced, to ensure that Common Domain messages will not be rejected.This BRTs will not be assigned in declaration message in order to reassure the data quality in movements initiated in NCTS.P5.  **More specifically based on IM445413:**  **R0983**: is assigned on /\*/Consignment/HouseConsignment/grossMass.  The wording of **R0983** is the following:    Business wise the general approach of R0983 is correct in NCTS .P5. On the other hand, the described restriction in the wording of Rule as presented in NCTS.P5, is not appeared in NCTS.P4.  In addition, based on the current Data Mapping, the Data Group of NCTS.P5 CONSIGNMENT.HOUSE CONSIGNMENT.Gross mass is mapped to the HEADER.Total gross mass of NCTS.P4.  The structure regarding the Total gross mass is the following in NCTS.P4:  …  …  NCTS accompanying document language code R a2 CL012  Total number of items R n..5  Total number of packages O n..7 R105  **Total gross mass R n..11,3**  Specific Circumstance Indicator D a1 CL096 C186 R825  …  …  The Data Item, ‘Total gross mass’ is Required in NCTS.P4 and no Rules or Conditions are applied to validate the information provided.  As a result, in order to avoid any rejection due to the restrictions of Rule R0987, a new BRT will be introduced in Common Domain messages.  The same approach will be followed for Rules R0107, R0983, R0990 & R0994, given the fact that no restriction is applied in NCTS.P4 while in NCTS.P5 the way the Data Item is validated is provided.  More specifically:   * New BRT **B1911** will be applied so that to deactivate during Transitional Period **R0107** in Common Domain Messages. Currently, R0107 is applied in the following data items:   + <CONSIGNMENT-TRANSPORT EQUIPMENT-SEAL.Identifier> in messages: CD001C, CD012C, CD050C, CD160C, CD003C, CD038C, CD115C, CD165C, CD018C   + <CONSIGNMENT-INCIDENT-TRANSPORT EQUIPMENT -SEAL.Identifier> in messages CD003C, CD038C, CD115C, CD165C, CD180C, CD181C   No BRT will be assigned on the data item <CONSIGNMENT-INCIDENT-TRANSPORT EQUIPMENT -SEAL.Identifier> for messages CD180C, CD181C, CD003C, CD115C, CD165C since in this case the Data Group <CONSIGNMENT-INCIDENT> is unmapped.  An indicative example (message **CD038C)** is presented below:  for <CONSIGNMENT-TRANSPORT EQUIPMENT-SEAL.Identifier>    for <CONSIGNMENT-INCIDENT-TRANSPORT EQUIPMENT -SEAL.Identifier>  R 87  ——SEAL   * New BRT **B1912** will be applied so that to deactivate during Transitional Period **R0983** in Common Domain Messages, Currently R0983 is applied in the data item<CONSIGNMENT- HOUSE CONSIGNMENT. Gross mass> of the following Common Domain Messages: **CD001C, CD003C, CD012C, CD038C, CD050C, CD115C, CD160C, CD165C**   An indicative example (message **CD165C)** is presented below:     * New BRT **B1913** will be applied so that to deactivate during Transitional PeriodR0990 in Common Domain Messages. Currently R0990 is applied in data item <TRANSIT OPERATION. TIR Carnet number> of the following Common Domain Messages: CD001C, CD003C, CD012C, CD038C   An indicative example (message **CD001C)** is presented below:     * New BRT **B1908** will be applied so that to deactivate during Transitional Period **R0994** in Common Domain Messages.Currently R0994 is applied in data item <CONSIGNMENT. Gross mass> of the following Common Domain Messages: CD001C, CD003C, CD012C, CD038C, CD050C, CD115C, CD160C, CD165C   An indicative example (message **CD001C)** is presented below:     * Finally B1836 shall be de-assigned from the external domain messages: CC013C, CC015C in order to reassure that newly created declaration messages, initiated in NCTS.P5, shall be valid with C0030. B1836 is currently applied in both CC013C, CC015C, to data group ---CUSTOMS OFFICE OF TRANSIT (DECLARED):     The wording of B1836 is the following:    The wording of C0030 is the following: |

**Section 3: Description of proposed solution**

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| The **DDNTA-v5.14.1 (incl. Appendix K) and the CSE-v51.6.0** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):  The same approach will be followed for **Rules R0983, R0990 and R0994.**  New BRTs will be created to de-activate **R0107, R0983, R0990 and R0994** during Transitional period in Common Domain Messages:   * New **BRT B1911** shall be created to deactivate **R0107** with the following description:   **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0107 shall be disabled.    **Functional Description:**  N/A  *Common Domain:*  Validated by Sender: ‘R’  Validated by Recipient: ‘R’  The BRT will be assigned on:   * <CONSIGNMENT-TRANSPORT EQUIPMENT-SEAL.Identifier> in messages: **CD001C, CD003C, CD012C, CD018C, CD038C, CD050C, CD115C, CD160C, CD165C** * <CONSIGNMENT-INCIDENT-TRANSPORT EQUIPMENT -SEAL.Identifier> in message: **CD038C**   An indicative example (**CD038C**) is presented below:  …  ---CONSIGNMENT  …  ------TRANSPORT EQUIPMENT 9999x D C0872 G0103  ---------SEAL  Sequence number R n..5 R0987  Identifier R an..20 R0107 B1911  …  ------INCIDENT 9x O G0015  …  ------------SEAL  Sequence number R n..5 R0987  Identifier R an..20 G0023 R0107 B1911   * New **BRT B1912** shall be created to deactivate **R0983** with the following description:   **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0983 shall be disabled.    **Functional Description:**  N/A  *Common Domain:*  Validated by Sender: ‘R’  Validated by Recipient: ‘R’  The BRT will be assigned on:   * <CONSIGNMENT- HOUSE CONSIGNMENT. Gross mass> in messages: **CD001C, CD003C, CD012C, CD038C, CD050C, CD115C, CD160C, CD165C**   An indicative example (**CD001C**) is presented below:  ---CONSIGNMENT  …  ------HOUSE CONSIGNMENT  Sequence number R n..5 R0987  Country of dispatch D a2 CL008 C0909 E1301 G0062 G0988  Gross mass R n..16,6 R0983 B1912  Reference number UCR D an..70 C0502 E1301 G0002 G0062  Security indicator from export declaration O n1 CL217 G0025 G0026  …   * New **BRT B1913** shall be created to deactivate **R0990** with the following description:     **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0990 shall be disabled.    **Functional Description:**  N/A    *Common Domain:*  Validated by Sender: ‘R’  Validated by Recipient: ‘R’  The BRT will be assigned on:   * <TRANSIT OPERATION. TIR Carnet number> in messages: **CD001C, CD003C, CD012C, CD038C**     An indicative example (**CD001C**) is presented below:  ---TRANSIT OPERATION 1x R  MRN R an18 G0002 R0028  Declaration type R an..5 CL231 R0601 R0909 R0911  TIR Carnet number D an..12 C0411 R0990 B1913  Declaration acceptance date R an10 G0002  Release date R an10 G0002  Security R n1 CL217  Reduced dataset indicator R n1 CL027  Specific circumstance indicator D an3 CL296 C0812  Binding itinerary R n1 CL027   * New **BRT B1908** shall be created to deactivate **R0994** with the following description:     **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0994 shall be disabled.    **Functional Description:**  N/A    *Common Domain:*  Validated by Sender: ‘R’  Validated by Recipient: ‘R’  The BRT will be assigned on:   * <CONSIGNMENT. Gross mass> in messages: **CD001C, CD003C, CD012C, CD038C, CD050C, CD115C, CD160C, CD165C**   An indicative example (**CD001C**) is presented below:  …  --CONSIGNMENT  Country of dispatch D a2 CL008 C0909 G0988  Country of destination D a2 CL008 C0343  Container indicator R n1 CL027  Inland mode of transport D n1 CL218 C0399  Mode of transport at the border D n1 CL218 B1899 C0029 G0020  Gross mass R n..16,6 E1109 R0994 B1908  Reference number UCR D an..70 B1895 C0502 G0002  …   * B1836 will be removed from CC013C, CC015C from the data group < CUSTOMS OFFICE OF TRANSIT (DECLARED)>:   …  ---CUSTOMS OFFICE OF DESTINATION (DECLARED) 1x R G0034  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x D ~~B1836~~ C0030 G0030  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D C0587  …  **NCTS-Data Mapping- v0.43 file:** “NCTS-Data Mapping- v0.43” will be updated based on the changes described above. More specifically,   * For < CONSIGNMENT-TRANSPORT EQUIPMENT-SEAL.Identifier> in messages: CD001C, CD003C, CD012C, CD018C, CD038C, CD050C, CD115C the column “Resolution for Upgrade” and “Resolution for Downgrade” will be updated to indicate that “During Transitional Period, a technical rule will be applied to disable the R0107”. * For <CONSIGNMENT-INCIDENT-TRANSPORT EQUIPMENT -SEAL.Identifier> in message: CD038C the column “Resolution for Upgrade” and “Resolution for Downgrade” will be updated to indicate that “During Transitional Period, a technical rule will be applied to disable the R0107”. * For <CONSIGNMENT- HOUSE CONSIGNMENT. Gross mass> in messages: CD001C, CD003C, CD012C, CD038C, CD050C, CD115C the column “Resolution for Upgrade” and “Resolution for Downgrade” will be updated to indicate that “During Transitional Period, a technical rule will be applied to disable the R0983”. * For <TRANSIT OPERATION. TIR Carnet number> in messages: CD001C, CD003C, CD012C, CD038Cthe column “Resolution for Upgrade” and “Resolution for Downgrade” will be updated to indicate that “During Transitional Period, a technical rule will be applied to disable the R0990”. * For <CONSIGNMENT. Gross mass> in messages: CD001C, CD003C, CD012C, CD038C, CD050C, CD115C the column “Resolution for Upgrade” and “Resolution for Downgrade” will be updated to indicate that “During Transitional Period, a technical rule will be applied to disable the R0994”.   **IMPACT ASSESSMENT:**  This RFC proposal concerns changes at sematic level in Common Domain messages.  It is considered that the change proposed via the current IAR has impact on business continuity and therefore shall be deployed in a **Big Bang approach**. More specifically:  **Changes at semantic level**  The changes at the semantic level, namely concern the addition three new BRTs in common domain messages.  *With respect to the new BRT B1911:*   * If the sender is aligned with the proposed changes (DDNTA 5.15.0), and the receiver is not aligned with the proposed changes (DDNTA 5.14.1), in case the <TRANSPORT EQUIPMENT-SEAL.Identifier> is not unique in the whole declaration then a semantic error shall be caused (IE906) due to R0107, since the in DDNTA 5.14.1 the latter mentioned rule is not deactivated; * If the sender is not aligned with the proposed changes (DDNTA 5.14.1), <TRANSPORT EQUIPMENT-SEAL.Identifier> is unique in the whole declaration. If the receiver is aligned with the proposed changes (DDNTA 5.15.0), then no semantic rejection shall be caused when TRANSPORT EQUIPMENT-SEAL.Identifier> is unique in the whole declaration.   *With respect to the new BRT B1912:*   * If the sender is aligned with the proposed changes (DDNTA 5.15.0), and the receiver is not aligned with the proposed changes (DDNTA 5.14.1), in case the <CONSIGNMENT-HOUSE CONSIGNMENT.Gross mass> is not GREATER than nor EQUAL to the sum of <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-COMMODITY-GOODS MEASURE.Gross mass> available for all Consignment Items included in that House Consignment then, a semantic error shall be caused (IE906) due to R0983, since the in DDNTA 5.14.1 the latter mentioned rule is not deactivated; * If the sender is not aligned with the proposed changes (DDNTA 5.14.1), the <CONSIGNMENT-HOUSE CONSIGNMENT.Gross mass> is GREATER than EQUAL to the sum of <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-COMMODITY-GOODS MEASURE.Gross mass> available for all Consignment Items included in that House Consignment. If the receiver is aligned with the proposed changes (DDNTA 5.15.0), then no semantic rejection shall be caused.   *With respect to the new BRT B1913:*   * If the sender is aligned with the proposed changes (DDNTA 5.15.0), and the receiver is not aligned with the proposed changes (DDNTA 5.14.1), in case the /\*/TransitOperation/TIRCarnetNumber has not the format an10 or an11 and is not follow the algorithm defined by IRU, then a semantic error shall be caused (IE906) due to R0990, since the in DDNTA 5.14.1 the latter mentioned rule is not deactivated; * If the sender is not aligned with the proposed changes (DDNTA 5.14.1), /\*/TransitOperation/TIRCarnetNumber has the format an10 or an11 and follows the algorithm defined by IRU. If the receiver is aligned with the proposed changes (DDNTA 5.15.0), then no semantic rejection shall be caused.   *With respect to the new BRT B1908:*   * If the sender is aligned with the proposed changes (DDNTA 5.15.0), and the receiver is not aligned with the proposed changes (DDNTA 5.14.1), in case the value of /\*/Consignment/grossMass is not GREATER than nor EQUAL to the sum of /\*/Consignment/HouseConsignment/grossMass for all house consignments, then a semantic error shall be caused (IE906) due to R0994, since the in DDNTA 5.14.1 the latter mentioned rule is not deactivated; * If the sender is not aligned with the proposed changes (DDNTA 5.14.1), the value of /\*/Consignment/grossMass is GREATER than or EQUAL to the sum of /\*/Consignment/HouseConsignment/grossMass for all house consignments. If the receiver is aligned with the proposed changes (DDNTA 5.15.0), then no semantic rejection shall be caused.   *With respect to the removal of B1836:*   * it concerns the removal of B1836 from External Domain messages CC013C and CC015C. Thus, the implementation of this part of the RFC shall be examined at national level by the MSAs.   **Movement initiated under the previous DDNTA (5.14.1) release which continues its flow under the new DDNTA (5.15.0) release (open movement):**  No issue is identified if a movement was initiated under the previous DDNTA (DDNTA 5.14.1) release and continues its flow under the new DDNTA (DDNTA 5.15.0) release (open movement).  **Changes at syntactic level**  N/A  **Impact in case of no Implementation**  In case of not implementing this change, rejections can possibly occur in common domain messages due to the validation failure of R0107, R0983, R0990 and R0994.  **Proposed** date of applicability in Operations (**T-Ops**):   1.12.2022  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  January 2022  **Impact on transition**: Yes  **Risk of not implementing the change:** Yes  **Impacted Messages:** CD001C, CD003C, CD012C, CD018C, CD038C, CD050C, CD115C, CD160C, CD165C, CD180C, CD181C  **New Rules:**   * B1911, B1912, B1913, B1908 and B1836   **Impacted CIs:**   * **CSE-v51.6.0: Yes;** * **DDNTA-5.14.1-v1.00; (Appendix Q2\_R\_C, K, PDFs): Yes;** * **DMP Package-v5.6.0 SfA-v1.00: (incl. update of file Rules and Conditions\_v0.43): Yes;** * **NCTS\_TRP-5.7.5: Yes;** * **NCTS\_CTP-5.7.0-v1.00: Yes;** * **CRP-v5.5-v1.00: Yes;** * **ACS - v5.5.0 & ACS-Annex-NCTS: 5.5.0: Yes;** * ieCA 1.0.1.0: No; * CS/MIS2\_DATA: No; * CS/RD2\_DATA: No; * UCC IA/DA Annex B: No; * Functional Specifications (FSS/BPM): No; * DDNTA-5.14.1-v1.00 (Main Document): No; * DDCOM v20.3.0-v1.00: No; * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No * CTS-5.6.1-v1.00: No |

**Impact on CI artefacts**

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| **DDNTA-5.14.1-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices generated by CSE + Appendix Q2, Q2\_R\_C** | |
| **CSE-** **v51.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **As described in section 3** | |
| **DMP Package-v5.6.0 SfA-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **NCTS- Data Mapping- v0.43 file on conversion resolution fields. || Rules and Conditions\_v0.43 file to be updated** | |
| **TRP- 5.7.5** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of messages according to the updates of specifications.** | |
| **CTP-5.7.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of scenarios according to the updates of specifications.** | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | This RFC proposal concerns changes at sematic level in Common Domain messages.  It is considered that the change proposed via the current IAR has impact on business continuity and therefore shall be deployed in a Big Bang approach. | |

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 13/07/02021 | *Draft by CUSTDEV* |
| v0.20 | Updated by CUSTDEV, based on DG TAXUD comments | 11/02/2021 | *Draft by CUSTDEV* |
| v0.21 | Updates by CUSTDEV | 15/12/2021 | *Version Update* |
| v1.00 | SfA to NPMs | 25/02/2022 | SfA to NPMs |