



PROFESSIONAL ASSOCIATION OF EXPORTERS & IMPORTERS

**Declaring Assists on
Duty Free Entries**

By George R. Tuttle, III

I was visiting an importer a few weeks ago and we were talking about how they were working on their customs compliance program. We got around to the subject of “assists,” the company explained that while it did provide parts, components, and tooling to its foreign supplier free of charge, the total value of the assist was declared on the first entry of merchandise made in the month after the assist was sent. The company thought that this was a good solution because the merchandise was duty-free and the Merchandise Processing Fee (MPF) capped out at the maximum value of \$485. This, it was noted, saved the company some money and avoided the time-consuming and manual work of apportioning the value of the assist over subsequent entries.

While this certainly sounds like a reasonable solution, some research into the regulations and Customs’ Value Encyclopedia indicate that such a method of declaring assists may not be permitted.

The primary method of Customs valuation is Transaction Value. 19 U.S.C. §1401a(b). Transaction value is defined as the total price actually paid or payable for the merchandise when sold for exportation to the United States, less any costs, charges, or expenses incurred for international transportation and insurance, plus amounts equal to: *** the value, apportioned as appropriate, of any assist.

Section 152.103(d) of the Customs Regulations

provides that if the value of an assist is to be added to the price, the port director shall determine the value of the assist and apportion that value to the price of the imported merchandise. Section 152.103(e)(1) explains that:

The apportionment of the value of assists to imported merchandise will be made in a reasonable manner appropriate to the circumstances and in accordance with generally accepted accounting principles. The method of apportionment actually accepted by Customs will depend upon the documentation submitted by the importer. If the entire anticipated production using the assist is for exportation to the United States, the total value may be apportioned over:

Cont’d on page 3

IN THIS ISSUE

Declaring Assists on Duty Free Entries By George R. Tuttle, III.....	Cover
PAEI Board of Directors and Officers and Contact Information	2
Singapore & Chile Free Trade Agreements & More to Come by Dan Kromat	4
“State of Our Port” By Jo-Anne Daniels	5
Tid-Bits from U.S. Customs & Border Protection by Dan Kromat	6
Upcoming Events	7 - 10
Watch Us Grow!	11
P.A.E.I. Membership Application	12

**ZERO IN ON THE
RIGHT EMPLOYEE!**

We'll advertise them free of charge!

**Advertise your job
openings with P.A.E.I.!**

Detailed instructions on how to post jobs are
available at [Http://www.paei.org/](http://www.paei.org/)

Visit our web site for meeting
details, membership information, and
valuable trade resources.

<http://www.paei.org/>

P.A.E.I. NEWSLETTER

*Published bimonthly by the Professional Association of
Exporters and Importers, P.O. Box 612743, San Jose,
CA 95161-2743; Message Center (408) 532- PAEI, or
(800) 930-PAEI.*

Board of Directors; Dan Kromat, Jo-Anne Daniels,
Luke Alexander, Gieselle Perez, Cindy Shull Lakey
Officers; President - Martina de la Torre; Chairman of
the Board - Dan Kromat; VP Admin. - Open; Secretary -
Gieselle Perez; Treasurer - J. Dixon Reilley
Committee Chairs; Education, Marc Torres; Marketing,
Tansie Iwafuchi; Membership, open; Programs, Martina
de la Torre
Editor; Open
Publisher; Karen Hebert, Direct Mail Services

*Articles for publication, letters to the editor, and requests for
copies should be submitted to dan.kromat@ksicorp.com, or on
diskette to the P.A.E.I. PO Box in San Jose . Articles must be
submitted to the Editor NLT the 3rd of each odd month, News-
letters will be emailed the 1st of each even month. P.A.E.I. does
not guarantee the accuracy of the contents of this publication.
For further information concerning the topics in the newsletter
consult the applicable regulations or your local Department of
Commerce or Customs representative.
2004 P.A.E.I., Inc. All rights reserved.*

2004 P.A.E.I. Board of Directors/Officers

President

Martina de la Torre
Silicon Graphics, Inc.
martinadelatorre@yahoo.com

Vice President of Administration
Open

Treasurer

J. Dixon Reilley
Reilley and Associates
dreilley@quixnet.net

Director & Secretary

Gieselle Perez
Atmel Corp.
gperez@atmel.com

Director

Luke Alexander
Hitachi Data Systems
luke.alexander@hds.com

Director

Jo-Anne Daniels
Trade Resources & Associates
tra3332003@yahoo.com

Chairman of the Board & Director

Dan Kromat
KSI Corp.
dan.kromat@ksicorp.com

Vice President for Development & Director

Cindy Shull Lakey
MK Technology
cindy@ibek.com

**P.O. Box 612743
San Jose, CA 95161-2743
(408) 532-PAEI**

Cont'd from page 1

- (i) *The first shipment, if the importer wishes to pay duty on the entire value at once,*
 - (ii) *The number of units produced up to the time of the first shipment,*
- or
- (iii) *The entire anticipated production.*

In addition to these three methods, the importer may request some other method of apportionment in accordance with generally accepted accounting principles.

Based on section 152.103(h)(i), it looks as if our company is doing everything O.K., right? Wrong. The Customs Value Encyclopedia references Headquarters' letter ruling 542519 dated July 21, 1981 (TAA No. 35), which states,

the value of an assist must be apportioned reasonably in accordance with generally accepted accounting principles. The value of an assist may not be apportioned entirely to the first entry of merchandise where the entry is duty free.

This ruling is still valid. More recently, in HQ 545031, June 30, 1993, Customs Headquarters' said:

Congress, by requiring the value of assists to be added to the price actually paid or payable, intended the value of assists to be dutiable. Thus, we do not allow apportionment of the entire value of an assist over the first duty free entry of merchandise . . . See HRL 542519, undated (TAA No. 35, and HRL 544194), dated May 23, 1988.

The reason for this rule is simple, and although not the original intent, it prevents all of the assist costs from being declared on a single entry, thereby increasing the likelihood that the value cap for MPF would be exceeded, and depriving Customs of MPF revenue it would other-

wise receive if the value of the assist were apportioned to other entries of the same merchandise.

This example brings home the importance of doing thorough research on what is permitted under the Customs laws and regulations. A quick look at the regulations alone would have satisfied most importers that what they were doing was O.K. However, it is only after researching "assists" in the Customs Value Encyclopedia that one finds it is not. Customs' reasonable care guidelines anticipate importers will consult the regulations and relevant rulings, particularly those found in the Customs Value Encyclopedia, and seek the advice of Customs experts.

But this raises a second point too, namely, the importance of seeking verification from Customs regarding the acceptability of a proposed method of dealing with a particular Customs transaction. In the case of assists, sections 152.103(d) and (e) clearly imply that importers are to seek the advice from Customs regarding a proposed method of apportioning an assist. As noted in 152.103(d) and (e), "the Port Director shall determine the value of the assist and apportion that value to the price of the imported merchandise," and "the method of apportionment accepted by Customs will depend upon the documentation submitted by the importer."

In today's environment, local Customs teams are focusing more on cargo security and less on the appropriateness of individual entries. Importers should not interpret this to mean that Customs' enforcement of its laws and regulations are lax. Importers are expected to know the rules and to implement them. Enforcement tends to fall on Customs' audit branch, which is less flexible than Import Specialists when interpreting the regulations. So, do your homework, and, when needed, get an opinion from Customs or your Customs expert.

(George R. Tuttle, III, is a San Francisco attorney who specializes in Customs and international trade regulation. For more information on this subject, he can be reached at (415) 986-8780 or by e-mail at geo@tuttlelaw.com.)

Singapore & Chile Free Trade Agreements & More to Come

By Dan Kromat, PAEI Director

Anyone who has lifted or looked at the new tariff probably noticed that it is getting heavier and thicker every year – this year more than most. The (GNs) General Notes for these new (FTAs) Free Trade Agreements adds about 180 pages to the tariff.

The General Notes make the Singapore and the Chile FTAs look very similar to NAFTA, except the (RVC) Regional Value Content requirements for some HTS numbers is 35% using a Built-Up method, or 45% using the Build-Down method.

If you hope to take advantage of these two new FTAs, you should read at least the first few pages of the GNs covering each of the new FTAs in question. These pages discuss the definitions, special notes for textile and apparel articles, de minimis, accumulation, regional value content, value of materials, accessories/spare parts/tools, fungible goods and materials, packaging materials and containers, indirect materials, record-keeping requirements and verification, and goods that shall be considered originating goods. The U.S. - Singapore FTA uses the (SPI) Special Program Indicator “SG” and the U.S. - Chile FTA uses the SPI “CL” in the column identified as “Special” under the Rates of Duty identified on each of commodity duty rates under the various chapters. You will find the details for the U.S. - Singapore FTA starting on GNs page 176 and the U.S. - Chile FTA starting on GNs page 267. For those without a 2004 HTS, this document is available on the ITC web site <http://www.usitc.gov/>

On December 17, 2003, U.S. government officials announced that a U.S. - Central America Free Trade Agreement (CAFTA) had been reached, which includes the Central American

countries of Nicaragua, Honduras, Guatemala, and El Salvador. Costa Rica was not part of the final agreement, as it needs more time to review certain issues such as textiles & apparel, services, and agriculture. It is thought that U.S. and Costa Rican officials will have further negotiations in early 2004, and that Costa Rica will eventually become a member of CAFTA. Under the Trade Promotion Authority law, the Administration is required to notify Congress at least 90 days before signing FTAs, and this notification is expected early in 2004. The U.S. Trade Representative expects CAFTA to build momentum toward hemispheric free trade with the very possible integration of Costa Rica, and possibly the Dominican Republic during 2004.

On other FTA fronts, the U.S. - Morocco FTA, and the U.S. - Australia FTA talks could wrap up in early 2004. Also, the USTR has notified Congress of the Administration's intent to initiate negotiations for a FTA with the Republic of Panama, Congress has urged the Administration to enter into negotiations with the United Kingdom for the purpose of creating a U.S. - U.K. FTA.

In addition, there appears to be good prospects for a U.S. - Middle East Free Trade Area (MEFTA). In addition, the USTR is looking for ways to enhance the (GSP) Generalized System of Preferences for Middle Eastern countries, such as expanding allowed products listings and expanding and improving their use of existing benefits.

(This article prepared by Dan Kromat, Manager Customs Compliance, a Licensed Broker working for KSI Corporation in South San Francisco, CA, . He can be reached at dan.kromat@ksicorp.com or 650-228-7155.)

“State of Our Port”

By Jo-Anne Daniels, PAEI Director

John P. Leyden, San Francisco Port Director, Customs and Border Protection, spoke to the trade about the State of the Port during dinner January 21, 2004.

Leyden said that Customs and Border Protection (CBP) now has new responsibilities of managing Immigration and Naturalization and USDA in addition to accomplishing their trade mission. March 1, the two additional agencies were merged into CBP under the Department of Homeland Security. CBP now has 42,000 employees which is almost half of the total 170,000 Homeland Security employees.

There is a new face on the border which is multi-dimensional and CBP cross-trains each officer to have knowledge of Customs, USDA and Immigration. Their main job is to prevent weapons of mass destruction from entering the borders, but last year they also prevented 4,639 pounds of narcotics to enter the U.S. CBP is also focusing on “co-locating” officers in terminals and hope to integrate the cargo terminals at the airport in late spring.

As part of the Container Security Initiative, CSI, program CBP will do pre-screening as early as possible and use technology to pre-screen high risk containers and use “non-intrusion technology.” The U.S. government has reciprocal programs with other governments like China, Japan, Germany, Singapore, and Taiwan.

Leyden reported about another trade program, Customs Trade Partnership against Terrorism, (C-TPAT) and stated that there are now 5,300 import partners. Leyden advised there are no speed bumps for new applicants. He quoted the C-TPAT Program Manager who stated, “the current review of security profile is better than it used to be, due to ...our knowledge and experience...with submissions.” He added that the C-TPAT staff has also adopted a tighter validation schedule.

New applicants are welcome.

CBP has program to screen non-citizen visitors entering the U.S and biometrics are used: each visitor is fingerprinted and digitally photographed when they enter the U.S. CBP will focus on the high risk visitors.

With the advent of the Bioterrorism Act (BTA) to protect the U.S. food supply from terrorist threats in December 2003, the mandatory registering of international and domestic facilities that process, manufacture or pack or hold food for U.S. consumption and prior notice of food products entering the U.S., Leyden reported there are now 141,000 facilities registered with FDA. Full implementation of BTA will be August 2004. Leyden reports there has been no interference in the flow of traffic in San Francisco.

Leyden said Commissioner Bonner want industry to use the “Smart Boxes” with sensors which will help CBP detect container security violations. Containers are screened for radiation when they enter the terminal. The policy is to detect, confirm, isolate and relocate. Leyden said that it is not that difficult to slip in “dirty” boxes in a shipment and recalled a container violation anecdote when drug smugglers placed cocaine in a Mickey Mouse import shipment. Because intelligence has revealed that terrorists will more likely strike aircrafts, more officers have been shifted to the air environment.

The evening ended with John Leyden’s epilogue. He said that Commissioner Bonner briefs his staff seven days a week and Bonner stated we are a “Nation at War and now have an enemy without boundaries.” CBP has an enforcement minded focus, however, the Import Specialist will remain and the new CBP will not erode their base.

(This article was prepared by Jo-Anne Daniels, Trade Consultant - Licensed Broker at Trade Resources & Associates, in El Granada, CA, <http://www.traderesourcesandassociates.com/>. She can be reached at tra3332003@yahoo.com or at 650-726-6764)

Tid-Bits from U.S. Customs & Border Protection

By Dan Kromat, PAEI Director

U.S. Customs & Border Protection (CBP) has posted information on its new (eRulings) electronic ruling program to its Web site <http://www.cbp.gov/>. CBP advises that only (NCSD) National Commodity Specialist Division/New York is capable of receiving certain binding ruling requests from the public electronically. NCSD will respond to these eRulings requests. Rulings that require physical samples are excluded, as are ruling requests with more than five items to classify. Requests for eligible binding rulings can be emailed to binding.rulings@dhs.gov.

For email attachments, use only the following formats: Word (.DOC), JPEG for pictures (.JPG), Plain text (.TXT), or Adobe Acrobat (.PDF). As with any ruling requests, you must include a complete statement of facts and sufficient information to determine classification. For the complete eRulings information sheet and template, go to CBP's Web site at <http://www.cbp.gov/>.

Intellectual Property Rights (IPR) data is now searchable and available on the CBP Web site <http://iprs.cbp.gov/>. Available information includes effective and expiration dates, product title, product description, owner, contact name, firm name, recordation number/agency number, and type of IPR. This database is updated nightly, Monday through Friday, and now contains over 27,000 searchable IPR recordations – showing effective dates from December 26, 1945 through November 20, 2003. If you want to apply for a CBP trademark and/or copyright recordation, the application templates are available at http://cbp.gov/xp/cgov/import/commercial_enforcement/ipr/

CBP is now involved in the pilot stage of centralizing the processing of Continuous Transac-

tion Bonds at the National Finance Center in Indianapolis, IN. Ports included in the pilot program are Chicago, Buffalo, Los Angeles/Long Beach, Seattle, and St. Albans, VT. The bond centralization program will include the filing, approval, and maintenance of all Continuous Transaction bonds. This program will be expanded nationwide after the rulemaking occurs. For more details go to the CBP Web site at <http://tinyurl.com/3aesl>

CBP has updated its guide on the (FA) Focused Assessment program (aka: FA kit). This update dated October 2003 contains 655 pages and replaces the updated version of December 2002. Most of the changes in the updated FA kit affect CBP auditors, not importers. The FA kit is available on the CBP Web site at <http://tinyurl.com/2cbwj>

(This article prepared by Dan Kromat, Manager Customs Compliance, a Licensed Broker working for KSI Corporation in South San Francisco, CA. He can be reached at dan.kromat@ksicorp.com, or 650-228-7155.)

PAEI Members Get Involved!

The P.A.E.I. Newsletter is a publication that is written by its many members. If you have an article you have written that you would like to be included in the next newsletter, please contact Dan Kromat at dan.kromat@ksicorp.com.

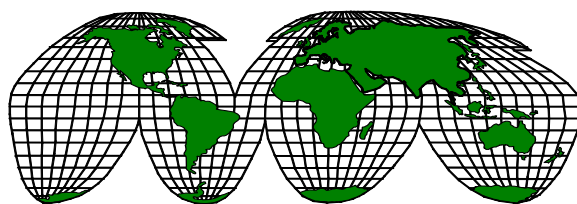
The PAEI Board of Directors is always interested in offering the education our members need. If you want to suggest a topic for a future course, please contact one of the PAEI Board members.

The PAEI Board looks forward to hearing from its valued members!

ABA Section of International Law and Practice Export Controls and Economic Sanctions Committee

**And With The Co-Operation Of
The Association of Corporate Counsel (S.F. Bay Area Chapter)
And
The International Law Section Of The State Bar Of California**

Export Controls and Sanctions: Emerging Trends and Compliance Challenges



**Friday, February 27, 2004
8:30 a.m. 5:30 p.m.**

**Rickey Hyatt Hotel, 4219 El Camino Real, Palo Alto, CA 94306
Phone: (650) 352-6589**

Registration fee includes lunch and program materials

Section or co-operating organization member \$350

Non Section/co-operating organization member \$450

Full-time government/academic \$225

Law student (lunch not included) \$65

Complete details are available at <http://www.abanet.org/intlaw/exportform.html>

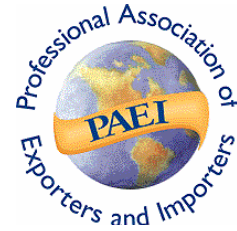
Contact Name: Jessica Elliot

Registration Contact: <mailto:Elliotj@staff.abanet.org>

Contact Phone: (202) 662-1663

**ABA Section of International Law and Practice Export Controls, 740 15th Street NW,
Washington, DC 20005, USA, Telephone: 202 662-1663; Fax 202 662-1669**

MCLE: Accreditation has been requested for the Export Controls Program from every state with general mandatory continuing legal education requirements for all lawyers. All appropriate *paperwork will be available at the registration desk.*



**The Bureau of Industry and Security
and
The Professional Association of Exporters and Importers
are proud to offer:**

“Complying with U.S. Export Controls”

May 10- 11, 2004

8:30 A.M. - 4:30 P.M.

at the

Biltmore Hotel and Suites

2151 Laurelwood Road

Santa Clara, CA 95054

This two-day Export Regulations Course is led by BIS’s professional counseling staff and covers the information you need to know to comply with U.S. export control requirements on commercial exports. Presenters also conduct a number of in-depth, “hands-on” exercises that help prepare attendees to apply the regulations in their own companies.

The seminar will focus on:

- The scope of the EAR
- Steps to take to determine the export licensing requirements for your item
- When you can export or reexport without applying for a license
- How to apply for an export control classification number
- Export clearance procedures and record keeping requirements
- Introduction to the concept of an Export Management System (EMS)
- Real life examples will be presented applying this information.

This program is well suited for those who need a comprehensive understanding of their compliance obligations under the regulations. All seminar-training materials will be furnished.

The Western Regional Office of the Department of Commerce, Bureau of Industry and Security is a State Bar of California approved MCLE provider. This course is worth 12 hours of MCLE credit. However, 0 hours will apply to legal ethics/law practice management; prevention, detection and treatment of substance abuse and emotional distress; and elimination of bias.

Note: Americans with Disabilities Act: If special arrangements are required for a disabled individual to attend this program, please notify the contact person at least one week prior to the program.

ACCOMODATIONS

Please make your reservations directly with the Biltmore Hotel and Suites by calling (408) 988-8411. Please mention "PAEI" to obtain a discounted rate of \$109 for the Garden rooms and \$129 for the Suites.

QUESTIONS?

For more information on the details of the program, please call BIS at (949) 660-0144, or (408) 998-7402 or PAEI (408) 532-PAEI (7234) or email at khebertdms@paei.org. You may also visit the web sites of PAEI <http://www.paei.org/> or BIS <http://www.bis.doc.gov/> for more information.

REGISTRATION No telephone or fax reservations please.

Advance registration is required for the Seminar and space is limited. Breakfast, lunch, coffee breaks, and training materials will be provided. No refunds for cancellations made after Monday, May 3, 2004.

You may register for this seminar and pay by credit card in a secure environment on PAEI's web site at <http://www.paei.org/>. We accept Visa/AMX/Mastercard only through the PAEI web site. Online registration must include the name of the attendee and their email address.

To pay by check, please send your check (payable to the Professional Association of Exporters and Importers, PAEI) in the amount of **\$295** to PO Box 612743, San Jose, CA 95161-2743. PAEI's Tax ID Number is 680117035. All registrations must be postmarked no later than Wednesday, April 28, 2004. A confirmation email will be sent to all paid registrants to verify that their registration is complete.

Please complete one registration form for each attendee. Please print clearly.

Attendee Name: _____

Job Title: _____

Company Name: _____

Street Address: _____

City, State, ZIP: _____

Phone: _____ Fax: _____

E-mail: _____

Check No. _____

PAEI Member: YES NO (circle one) Membership Number: _____



WATCH US GROW!

November 2003

New

Gordon W Travis

Renew

E .Patricia Barney NVIDIA Corporation

Henry Pizaaro NVIDIA Corporation

December 2003

Renew

Maryann Moreno Maxtor Corp.

Tim Dugan Maxtor Corp.

Tom Williams Legato Systems, Inc

Mona Peglow Legato Systems, Inc

Hal Plimpton Int'l Support Systems

Laura Lane

John DiGirolamo Hitachi Storage Software, Inc

Jean Stein Hitachi Data Storage Software

Sean McCormick Roanoke Trade Services, Inc

Marc Torres Export Procedures Academy

Luke Alexander Hitachi Data Systems

Peggy Prince Hitachi Data Systems

Gendy Allbrook Apple Computer

Maxine Curry Apple Computer

Serena Lam Coherent

Nancy Valone Coherent

Maria Contrestano

Jennifer Eldefonso AMD

John Nieberding AMD

Surya Dhamija Air 7 Seas Transport Logistics

J Dixon Reilley Reilley & Associates

Sharon McGlynn Ditech Communications

Bahar Esteghamat Precision Software Ltd.

Greg Lloyd Precision Software Ltd.

Beverly Gonzales

Loren R. Sorensen Sorensen Associates

January 2004

New

Patrick Lee Acer America Corp.

Joseph Chou Acer America Corp.

Claire Chen Calmar Optcom, Inc

Elaine Osborne Linear Technology

Stephen Gillespie Fenwick & West LLP

Renew

Tina Ayala Memec

Lillian Lopez Novellus Systems

Brigitte Dang Stryker Endoscopy

Dave Watrous Stryker Endoscopy

Michino Gustafson Hitachi Data Systems

Ken Santana Hitachi Data Systems

Cont'd from page 10

WATCH US GROW!

January 2004

Renew

Edward J Radlo	Fenwick & West LLP
Deborah Ferry	
Susan Gleason	Fujitsu America, Inc
Jinny Lo	Fujitsu America, Inc
Dave Perez	National Semiconductor
Dan Kromat	KSI Corporation
Mike Ford	KSI Corporation
Giancarlo Vestri	Bank of America
Nicole Malcolm	Applied Materials, Inc
Dennis Shea	Stratex Networks
James Yu	Stratex Networks
Sharon Kolstad	Atmel Corporation
Gieselle Perez	Atmel Corporation
Bill Volner	Allergan, Inc

PAEI

16th Annual Membership Meeting

On Wednesday, December 3, 2003, PAEI held its 16th Annual Membership Meeting at the Biltmore Hotel and Suites. Over 50 members attended, and a few were joined by their spouses.

This was an even bigger turn out than last year. The food was great and everyone had a good time! Raffle tickets were given to each attendee, and door prizes were given out.

PAEI would like to thank the following companies who donated prizes that were raffled off; **FedEx, Trade Resources & Associates** and also **Export Procedures Academy**.

The Biltmore Hotel and Suites was very generous in donating the grand prize of the evening, which was a weekend get-away at the Biltmore Hotel and Suites for two people. The grand prize was won by Susan Leavitt of Geometrics, Inc.

A special “**Thank you**” to **Lydia Bostillo** for once again coordinating the Annual Membership Meeting. Lydia gathered all the great prizes that were raffled off during the evening and arranged the meeting at The Biltmore Hotel and Suites.

Mark Your Calendars!

PAEI/BIS Upcoming Programs

- **May 10-11, 2004**
“Complying with U.S. Export Controls”
- **August 10, 2004**
“Export Management Systems”
- **September 23-24, 2004**
“Complying with U.S. Export Controls”

Watch our web site

<http://www.paei.org/>

for these and other events.



P.A.E.I. Membership Information

The Professional Association of Exporters and Importers is an organization of professionals involved in import/export activities. Objectives of the association include promoting and fostering the role of the import/export professional, providing on-going education relative to regulatory issues, exchanging information and enhancing industry's participation in import/export control issues and policies.

P.A.E. I. sponsors quarterly luncheon meetings with featured guest speakers, a bimonthly newsletter, networking and job placement opportunities.

P.A.E.I. membership represents both large and small companies in the high-technology community. Membership is open to all persons interested in personal and professional growth in the international arena. Two types of memberships are available and are valid for one year from date of payment. For more information call the PAEI Message Center at telephone (800) 930-PAEI.

Complete this application and return it along with your check. **Make checks payable to: Professional Association of Exporters & Importers, P.O. Box 612743, San Jose, CA 95161-2743. PAEI's TAX ID NO: 680117035.**

Check Membership Choice:

_____ \$50.00 Individual _____ \$150.00 Corporate*

Name: _____

Title : _____

Phone: _____ **Fax:** _____

E-mail: _____

Company/Corporate Name: _____

Mailing Address: _____

City, State and Zip: _____

***Corporate members please indicate second name:**

2nd Name: _____

Title: _____

Phone: _____ **Fax:** _____

E-mail: _____

How did you hear about P.A.E.I.? _____