



**Asia-Pacific
Economic Cooperation**

**Supporting Continued Growth in Trade
and Facilitation: End to End Review of
the APEC Business Travel Card Scheme
Final Report**

APEC Business Mobility Group

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1 Executive summary

The APEC Business Travel Card (ABTC) business travel facilitation scheme, in operation since 1997, is commonly cited as one of the most distinctive and tangible outcomes from APEC. Cardholders are provided with multiple pre-cleared short-term entries to fully participating economies during the three year validity period of the card. ABTC holders also benefit from specially marked APEC entry and exit lanes at immigration processing, which provides fast track processing of cardholders at major border entry points in all APEC economies.

There is wide consensus among the APEC business community that the ABTC has made travel in the region easier by reducing the time and expense of visa applications and waiting in border immigration lines. These clear benefits have led to the steady growth of the scheme.

As the scheme matures, a number of questions have arisen as to how effectively the scheme is delivering on its promises of business travel facilitation. Challenges with the card application and approval processing times are being compounded by the steady growth in the number of cardholders, which has put increasing pressure on participating economies to deliver better solutions to serve larger numbers of clients. Policies which worked well with a limited number of applications have begun to show signs of stress from the growing number of card applications. While cardholders are by and large appreciative of the scheme, they are quick to point out several ways in which its performance has been less than desired.

Meanwhile, the march of technology development is presenting opportunities to modernize the card, although each opportunity must first overcome a number of technical and budgetary challenges. These opportunities include the potential for clients to apply for the card online, a biometrically-enabled ABTC, and the potential for the card data to be built into electronic passports in the future, eliminating the need for a physical card altogether.

This study, "Supporting Continued Growth in Trade and Facilitation: End to End Review of the APEC Business Travel Card Scheme", was commissioned by the APEC Secretariat under the guidance of the Australian Department of Immigration and Border Protection to analyze the current state of the ABTC scheme and identify areas for enhancing the efficiency of its processes to help ensure continued card adoption growth and client satisfaction. This report lays out the findings of this study, based on data and feedback gathered by the research team through interviews with a variety of administrative body and industry stakeholders in 11 economies, a survey of stakeholders across all 21 economies, APEC Business Mobility Group (BMG) discussions at the 2014 SOM 3 meeting, and a review of relevant documents produced by APEC and the BMG member economies.

First and foremost among the concerns expressed by both economies and clients is the time required for each cardholder to receive pre-clearance approval from all 19 full member economies participating in the ABTC scheme. This process currently averages around three months to complete, but there are widespread reports of far lengthier wait times ranging up to one year. For the senior businesspeople who are eligible for the

card, who may need to travel at any moment and who are accustomed to exceptional customer service from the travel industry, even three months is an extremely long time.

Along a similar theme, cardholders expressed frustration with what they perceive to be redundant steps required to reapply for the card each time it expires. There was strong interest in finding a way to simplify the renewal process for applicants who are current cardholders in good standing and thus are presumably unlikely to pose any security risks for the APEC economies processing their request for an ABTC card.

On the administrative side, there are concerns that despite the strain on economy resources from cardholder growth, the administrative bodies in most economies have been slow to embrace technological advances. Although e-Government services continue to expand rapidly across the region, ABTC applications remain largely paper-based, requiring economy staff to manually enter all data into the ABTC system, and increasing the likelihood of application errors that will require follow-up inquiries. Secondly, although nearly all APEC economies have adopted e-passports that can both enhance security and speed up border entry, the ABTC card remains without any machine readable component.

Other common concerns include handling passport renewals without disrupting ABTC usage, providing greater application process transparency and support for applicants, safeguarding client data, improving ABTC system functionality, achieving parity in technical capabilities of economies, and clarifying acceptable uses of the card.

To address these challenges, and to improve the overall performance of the scheme, the BMG is recommended to focus its future efforts on the following key actions:

1. Extension of ABTC card validity from 3 to 5 years
This change, already agreed on in principle by the BMG, would help to improve convenience for clients and reduce burdens on economies. This change would become effective for ABTC applications submitted after the implementation date.
2. Passport change policies
Implement technical improvements to streamline passport change approvals, as per Australia's concept note.
3. Improving the pre-clearance process
Allow clients to select a group of preferred economies for pre-clearance requests. Requests will not be made to other economies unless the client later makes a separate request, thereby allowing the client to receive a card more quickly and reducing the processing burden on economies.
4. Easing the process of ABTC renewals
Simplify process for clients in good standing to apply for ABTC renewals by allowing applications well in advance of the expiration date, and by retaining data from previous applications and enabling clients to simply confirm whether relevant data is unchanged rather than reenter all data.
5. At-the-border recommendations
Provide a guidebook or seminars to border immigration staff to ensure consistent treatment of ABTC clients.
6. Online lodgement
Implement a shared online lodgement platform that can be adopted by

- economies without current online lodgement capabilities.
7. Card-less ABTC scheme
Work towards adoption of automated immigration gates and integration of ABTC and economy visa systems to eventually support the integration of ABTC membership data with e-passports, thus removing the need for a physical ABTC.
 8. Core ABTC platform improvements and review
Provide added functionality and performance enhancements such as pre-population of certain data, varying levels of system access for different staff, and faster data transmission.
 9. Tracking metrics for ABTC usage and trade and investment flows
Create a method of tracking key travel and associated trade indicators to provide economies with valuable data on trade trends and the economic benefits of the scheme.
 10. Technical support group
Provide technical training support through existing APEC meetings or dedicated workshops to build the technical capabilities of all economies and to ensure the adoption of optimal processing methods, as well as to facilitate potential major technical changes such as online lodgement.
 11. Client contact center
Create a central call center to answer basic questions from clients about application status and the ABTC scheme, and to refer them to appropriate economy staff for urgent inquiries.

Further recommendations and details are covered in Chapter 5 of the report.

The ABTC scheme today is already a formidable asset to business travelers and trade across the APEC region. Adoption of these recommendations should ensure that the scheme continues to operate efficiently and will offer even more relevant and compelling services to support strong scheme growth and associated trade benefits for the foreseeable future.

2 Review of ABTC scheme

This chapter provides an overview of the ABTC scheme's background, growth, and recent developments.

2.1 Scheme background

The ABTC scheme was developed to provide the region's business community with easier access to other economies of the Asia-Pacific region in order to encourage travel to support APEC goals for business development, trade and investment. Beginning with three founding members Australia, Korea, and the Philippines in 1997, the scheme has grown to encompass all 21 APEC economies, including also Brunei Darussalam, Canada, Chile, China, Hong Kong (China), Indonesia, Japan, Malaysia, Mexico, New Zealand, Papua New Guinea, Peru, Russia, Singapore, Chinese Taipei, Thailand, the United States and Viet Nam.

Currently of the 21 participating economies, 19 are full members which issue cards to their own citizens and provide pre-clearance approval and fast-track lane access to business travelers from other economies, while the United States and Canada are transitional members which participate in all aspects of the scheme except for pre-clearances.

The ABTC, valid for three years, permits eligible businesspeople with legitimate business travel needs in the region to conduct travel without need for separate visa applications in fully participating economies, and provides access to priority fast track lanes at border immigration inspection facilities in all economies. Thus the card saves cardholders considerable money in terms of visa fees and considerable time in terms of border entry processing. Fully participating economies benefit from a reduced burden on at-the-border security resources because the growing numbers of ABTC cardholders are screened by all economies to ensure they are low-risk travelers.

2.2 Process Flows

Typically, a client initiates the ABTC application through sending an application to the government agency responsible for immigration. Applications are most commonly submitted by mail but are sometimes made in person, sent by courier, or, in rare cases, submitted online. In a number of economies, the application process is assisted by local industry associations (such as the national chamber of commerce), which help to verify the legitimacy of the applicant, and in some cases also help to shepherd the application through the process, through providing updates to the applicant on the application status and similar actions.

Once the public agency receives the ABTC application, it confirms that the application documents are in order, and initiates a criminal background check for the applicant to ensure that the applicant is eligible for the card, although in some economies the criminal background check must be completed as part of the application process prior to the application submission. The agency's ABTC staff (usually consisting of 3 – 6 FTEs¹) then upload the applicant's basic data onto the core ABTC system and request

¹ Full Time Equivalent staff responsible for processing ABTCs, usually in addition to other duties.

that the other 18 full member APEC economies (at the time of this report) provide pre-clearance for the applicant.

In several economies, the applicant also has the option to request an interim card, which is typically issued once the "priority" economies (typically five economies, along with any others that have responded before the priority economies have responded) have provided pre-clearance, or otherwise after a certain number of economies (such as 15) have provided pre-clearance. This interim card is valid until the applicant is issued a final card. In some economies, the holder is required to return the interim card once they have received a final card.

Once all of the full members of the ABTC scheme have provided their responses to the pre-clearance request, the home economy issues the ABTC, which is typically printed by the ABTC staff at the home economy. In some cases, the card is printed by Australia's Department of Immigration & Border Protection on behalf of other economies, namely Indonesia, Chile, Mexico, Brunei, Papua New Guinea, and the Philippines. The card is then either mailed to the applicant or the applicant is notified by email that the card is available for pick up at the public agency.

2.3 Adoption progress

The number of cardholders has grown steadily since the early 2000s, with a dramatic spike in growth since 2010. As of September 2014, there are more than 150,000 active ABTC cards across all the participating economies. Applications from China in particular have risen rapidly over the past 4 years, with the number of active cardholders rising more than 600% from 2010 to 2014, however nearly every economy has seen growth rates of 50% or higher. Other high adoption economies with more than 15,000 active cardholders include Australia and Singapore.

With the increase in card numbers, annual applicant pre-clearance requests have also risen. The median number of annual pre-clearance requests received by the case study economies that were studied for this publication was 55,144.

2.4 Recent developments

The inclusiveness of the scheme has been strengthened over the last few years as all economies have now begun to issue ABTC cards to their citizens. Russia began issuing cards in 2013, while the United States and Canada began to issue cards without the pre-clearance aspect of the ABTC in June 2014.

In August 2014, APEC BMG member economies agreed in principle to extend the validity period of the ABTC from three to five years. Actual implementation is expected to occur from August 2015 as economies undertake the necessary legal and policy actions individually throughout 2014-2015. In addition, the BMG will need to discuss amending the ABTC Operating Framework to allow for the five year validity period. This extension is expected to save both time and expense for clients and the economies by reducing the number of applications to be submitted and processed, and by reducing the number of cards that need to be printed.

3 Economy case studies

This chapter provides overviews of current ABTC processes, challenges, and initiatives in the 11 economies selected for case studies in this study: Australia, China, Indonesia, Japan, Malaysia, New Zealand, Papua New Guinea, Peru, Singapore, Thailand, and the United States.

3.1 High adoption cases

Economies with high numbers of ABTC clients face greater than average challenges in keeping up with the pace of domestic applications, and most have implemented advanced systems in some facet of the application/border entry processes to accommodate the strong demand.

3.1.1 Australia

Implementation of ABTC scheme

Australia has had a significant role in the development of the ABTC scheme from the trial stage conducted with Korea and the Philippines in the mid-1990s to full implementation in 1999 and onward.

Australia developed the current central web-based processing system for ABTC applications in 2005, and has maintained

hosting and systems administration responsibilities for the system since then. Originally the system was hosted by a third party provider in Australia, but in October 2013 the system was moved in-house to the Australian Government's own servers as part of a broad IT procurement streamlining initiative undertaken by the government. This move enabled more regular software and hardware updates, which have helped to greatly reduce system outages and improve server response times. Australia also provides card printing for some other participants in the scheme, namely Indonesia, Chile, Mexico, Brunei, Papua New Guinea, and the Philippines.

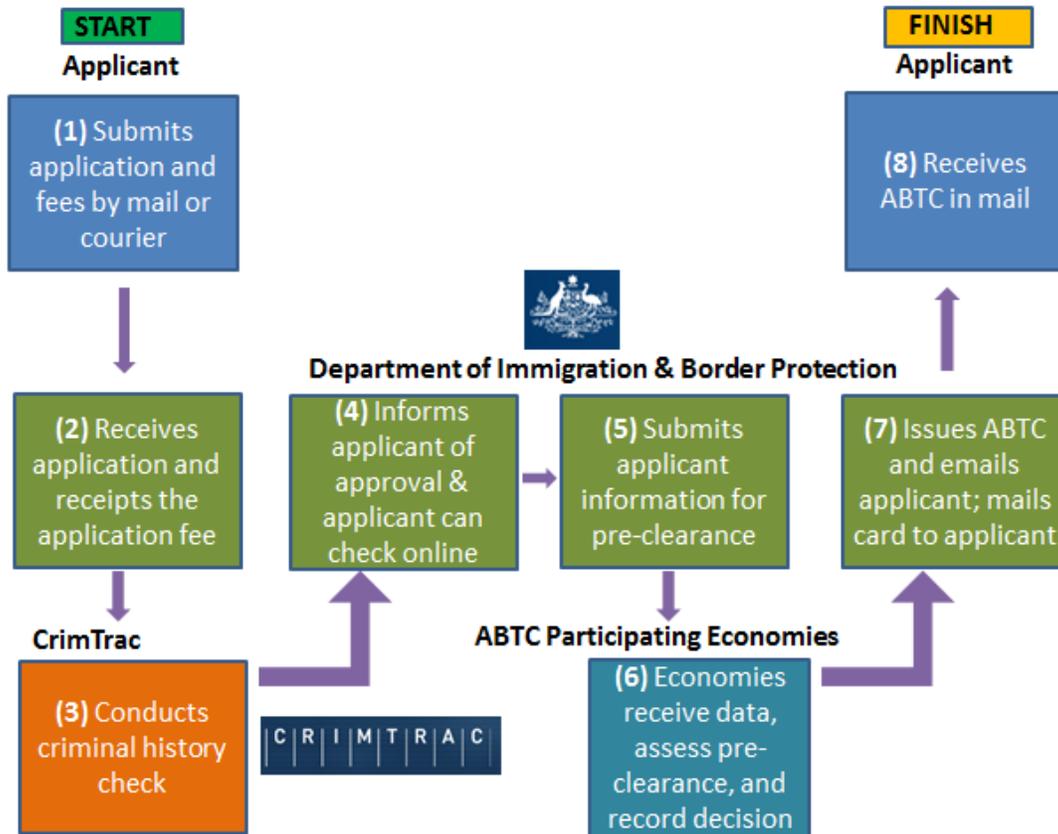
Since 2012 the Australian Chamber of Commerce and Industry and the Australian Industry Group had played a supporting role by certifying applicants for the ABTC scheme; however a government policy decision was made in early 2014 to return this responsibility to the Department of Immigration & Border Protection as part of an initiative to streamline government policies and reduce costs for clients.

Australia: Key Information ²	
Date joined the ABTC scheme	1997
Economy Population	22,507,617
# of cardholders (as of 12.8.14)	18,246
% growth in cardholders since 2010	-25%
# of pre-clearances issued annually (year ending May 2014)	62, 398
Key actors for ABTC scheme	Department of Immigration & Border Protection
Average time for applicant to receive a card with all pre-clearance approvals	17 days
Average time to process a pre-clearance request	19 days

² Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Australia Department of Immigration & Border Protection

Process Flow

Figure 1: Key steps of domestic ABTC application process flow



Impact on business travel experience

Awareness of the ABTC scheme is very high among businesspeople in Australia, who report substantial travel time savings due to fast track lane access. However, because Australians already have visa-free access to many APEC economies, some clients expressed skepticism about the overall value of the card, especially in light of the repetitive and time-consuming process of the card renewals. They urged simplification of card renewals and consideration of additional benefits for clients.

Challenges

- **Maintaining cardholder growth:** Some clients expressed skepticism about the long-term advantages of the ABTC scheme and particularly fast track access as immigration processing at the region's airports is becoming more automated and efficient for all travelers (such as the quick entry enabled by SmartGates in Australia). This perception presents Australia with a challenge in terms of maintaining cardholder growth.
- **Reducing pre-clearance times:** Like many other economies, Australia has faced some challenges to bring its pre-clearance times for foreign applicants down to three weeks or below.

Actions taken

Australia has drastically reduced its pre-clearance times in the past year and is now lower than the APEC average, in part due to more effective staff distribution by managers, and better understanding of the case loads.

The increased volume of ABTC applications across APEC economies had placed some strain on the speed and stability of the core ABTC servers, which led DIBP to move the system servers to a new location and manage them internally as of October 2013. This move has greatly improved ABTC system performance.

Future priorities

The DIBP hopes that online lodgement could significantly reduce time spent on manual data entry, and support client convenience, and has done some initial research on possible cost and time estimates for an online lodgement platform.

3.1.2 China

Implementation of ABTC scheme

In China the ABTC scheme is administered by the Ministry of Foreign Affairs of China (MFA), with support from the Exit and Entry Administration of the Ministry of Public Security, local Foreign Affairs Offices and some large corporations.

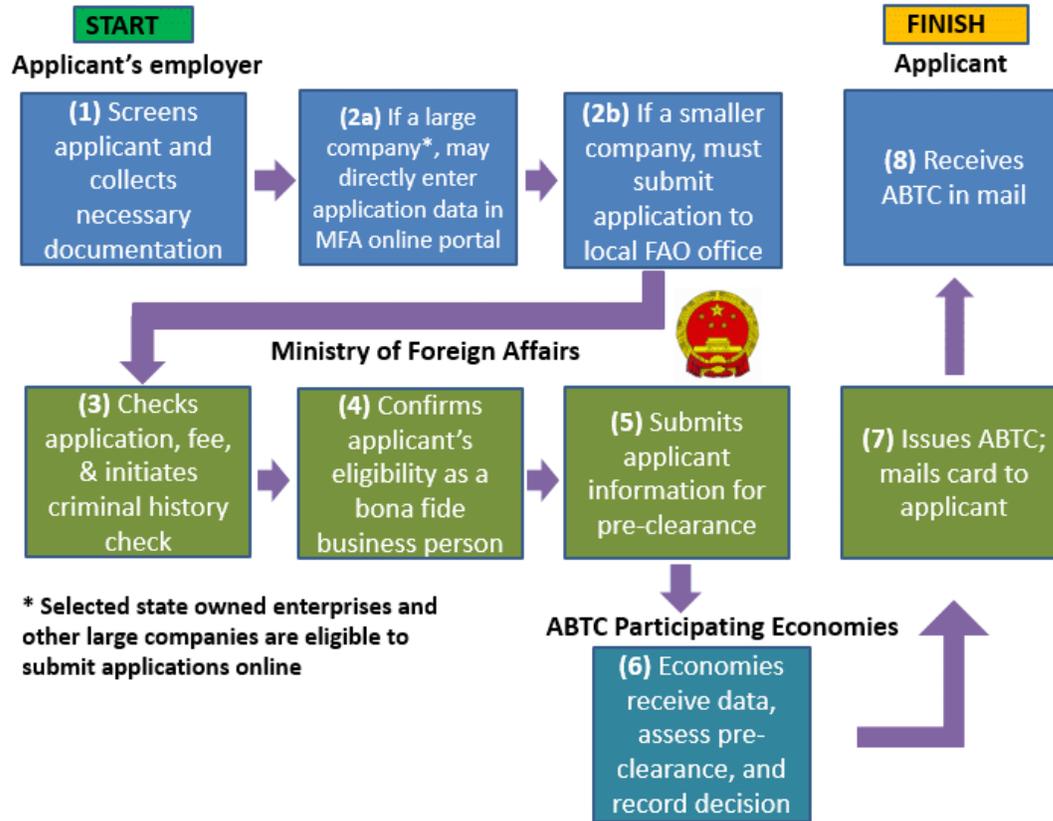
Applicants apply through their employers, which in the case of small companies submit paper applications to local Foreign Affairs Offices (FAOs), and in the case of select large companies submit electronic applications using an online portal developed by MFA. These select large companies, primarily state owned enterprises, are allowed to make direct electronic submissions to MFA because they are very reputable and known to be bona fide businesses. In so doing the large employers ease some of MFA's burden by strictly vetting their applicants and entering their data online directly into MFA's system, which reduces MFA's time spent on applicant vetting and data entry.

China: Key Information ³	
Date joined the ABTC scheme	2002
Economy Population	1,357,380,000
# of cardholders (as of 8.7.14)	29,351
% growth in cardholders since 2010	654%
# of pre-clearances issued annually (in 2013)	45,731
Key actors for ABTC scheme	Ministry of Foreign Affairs of China (MFA)
Average time for applicant to receive a card with all pre-clearance approvals	4-5 months
Average time to process a pre-clearance request	21 days

³ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Ministry of Foreign Affairs of China

Process Flow

Figure 2: Key steps of domestic ABTC application process flow



Impact on business travel experience

Chinese cardholders report considerable benefits from ABTC membership in terms of multi-economy visa access to APEC economies, many of which ordinarily require Chinese citizens to obtain visas. Concern was expressed about lengthy pre-clearance waits for a small group of economies.

Challenges

- Chinese industry representatives expressed concern that there is often a long wait to receive pre-clearance from all 19 full member economies. In particular there seems to be a small group of economies which is consistently slow to approve pre-clearance, and waits can last more than six months. Industry representatives also noted their interest in receiving increased information about pre-clearance status and suggested introducing an automatic pre-clearance approval system whereby approval would automatically occur after a set period of time if economies did not take action before the deadline.
- Some industry stakeholders also expressed interest in further government outreach and clarification of eligibility requirements for the ABTC.

Actions taken

The transition to online lodgement in 2014 has substantially reduced the time required for domestic application processing.

As the current daily volume of ABTC clients entering China remains relatively low, ABTC clients share a fast track lane with other special groups such as the elderly in order to cost effectively keep the lane constantly staffed.

Future priorities

China is deploying automatic gates across all its international airports to facilitate immigration processing. This infrastructure could support ABTC technical enhancements such as biometrics.

China is very interested in making further technical improvements locally and to the core ABTC system so that the speed of data transfers can keep pace with the expected continuation of rapid cardholder application growth.

3.1.3 Singapore

Implementation of ABTC scheme

Singapore has introduced a number of innovations to simplify obtaining an ABTC for residents. Applicants can apply for the ABTC online and pay via credit card through the application website, which is hosted on the same website that provides other government travel documents.

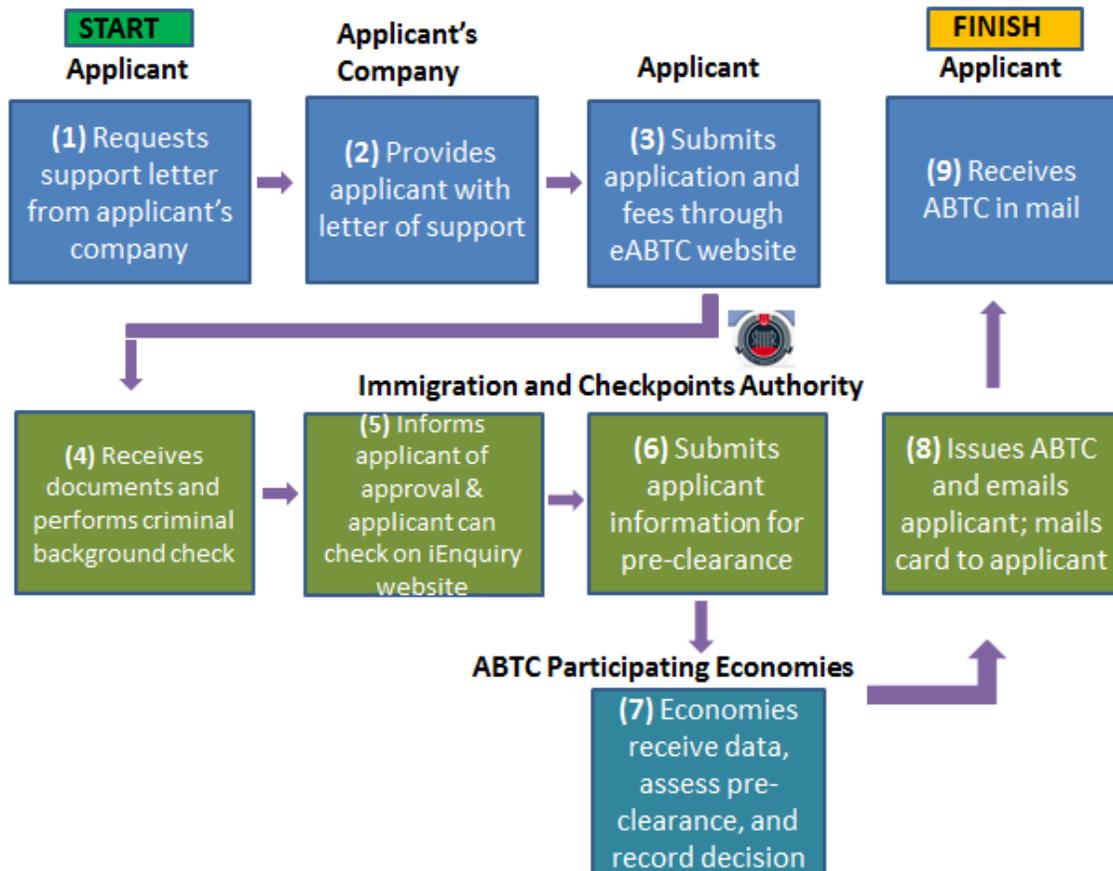
Singapore: Key Information ⁴	
Date joined the ABTC scheme	2004
Economy Population	5,567,301
# of cardholders (as of 17.5.14)	19,000
% growth in cardholders since 2010	133%
# of pre-clearances issued annually (in 2013)	47,000
Key actors for ABTC scheme	Immigration & Checkpoints Authority
Average time for applicant to receive a card with all pre-clearance approvals	Within 90 days
Average time to process a pre-clearance request	2 weeks

Once the application is complete, Singapore's Immigration and Checkpoints Authority (ICA) staff then manually re-enter the applicant's data into the core ABTC system. After the application is approved by participating economies, the card is then mailed to the client.

⁴ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Singapore Immigration & Checkpoints Authority

Process Flow

Figure 3: Key steps of domestic ABTC application process flow



Impact on business travel experience

According to interviews and surveys of clients, most Singaporean cardholders typically obtain the card primarily for the fast track lane access. Travelers don't see as much value in the multi-economy visa aspect of the card since most economies already offer visa-free travel to Singapore citizens. Clients also noted that the card further enhances the prestige/status of APEC and supports business travel in the region.

The most common complaint from Singapore business travelers was the lengthy renewal process for current clients, especially since the priority economies for the interim card often included some of the economies that are slower to grant pre-clearance. The extension of the card validity from 3 to 5 years would be very welcome.

Challenges

- ABTC system usage:** Since Singapore's visa processing system is not integrated with the core ABTC system (for technical and security reasons), a number of processes, such as entering data from the online ABTC application platform or granting approval for foreign pre-clearance requests, require several manual steps to accomplish. In addition, client files sometimes require significant staff work to correct minor data entry mistakes by the requesting economy, such

as incorrect biographic data, which can be a tedious, manual process.

- **Server connectivity:** Singapore's server connection to the core ABTC system is sometimes slow and can face lag times of about 1 minute when uploading new data.
- **Slow renewal times:** Industry representatives stressed that renewal of the ABTC card should be simpler or easier than initial applications.

Actions taken

In 2006, Singapore's ICA implemented online lodgement for domestic ABTC applications as part of Singapore's entry into the ABTC scheme, reflecting their perception that an online platform for applications would provide significant convenience for clients. Industry stakeholders have been appreciative of the convenience of card applications in surveys and interviews. The system also contributes to reduced staff time on processing applications, and streamlines the processing of payments for the card. Meanwhile, Singapore has suggested that the BMG explore whether it is possible to further streamline the "back end" of the application process through somehow transferring client data directly into the ABTC system, rather than manually re-entering information, which takes about 10 minutes per case on average.

In order to improve queue times and provide greater convenience for travelers, Singapore is encouraging its citizens to use automated kiosks, called the enhanced-Immigration Automated Clearance System (eIACS), at the immigration gate, which allows travelers in possession of valid machine-readable Singapore passports to clear immigration via the automated gates on their own.

Singapore has had past ABTC printing issues related to compatibility between their printer model and a new supplier for the holographic laminations, but has since been able to resolve these issues.

Future priorities

Singapore would like to see improvements to the core ABTC system to allow further automation of tasks, such as more opportunities for batch uploading of pre-clearance results and automated input of dates in the ABTC system.⁵ Staff also emphasized the need to set standards for response times to queries by email on the ABTC system.

⁵ This would prevent economies that are engaged in processing pre-clearance requests from missing applications which have the wrong dates stated on the applications. This issue is further explored in Chapter 4.6 of this report.

3.1.4 Thailand

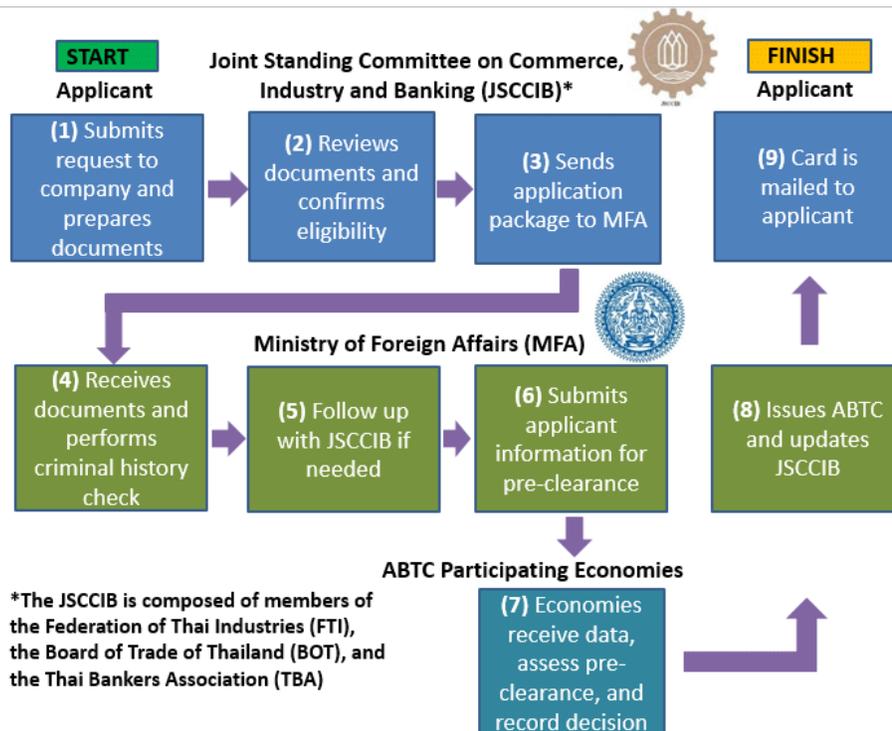
Implementation of ABTC scheme

In Thailand the ABTC application process is heavily supported by industry. The Joint Standing Committee on Commerce, Industry and Banking (JSCCIB), comprised of members of the Federation of Thai Industries (FTI), the Board of Trade of Thailand (BOT), and the Thai Bankers Association (TBA), collects, reviews, and submits ABTC applications to the Ministry of Foreign Affairs of Thailand (MFA) on behalf of employees of their member companies. Final review and approval of domestic ABTC applications, as well as pre-clearance requests, is conducted by MFA, for which functions funding is provided by JSCCIB.

Thailand: Key Information ⁶	
Date joined the ABTC scheme	2001
Economy Population	67,010,502
# of cardholders (as of 19.6.14)	10,512
% growth in cardholders since 2010	89%
# of pre-clearances issued annually (in 2013)	57,650
Key actors for ABTC scheme	JSCCIB, MFA
Average time for applicant to receive a card with all pre-clearance approvals	4-5 months
Average time to process a pre-clearance request	1 week

Process Flow

Figure 4: Key steps of domestic ABTC application process flow



⁶ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Ministry of Foreign Affairs of Thailand (MFA)

Impact on business travel experience

Thai cardholders report considerable benefits from ABTC membership in terms of multi-economy visa access to APEC economies, many of which ordinarily require Thai citizens to obtain visas. Concern was expressed about lengthy pre-clearance waits for a small group of economies, and strong interest in the participation of the US as a full ABTC member, which is expected to provide a dramatic boost for membership enrollment.

Challenges

- The JSCCIB expressed concern on behalf of its members that there is often a long wait to receive pre-clearance from all 19 full member economies. In particular there seem to be a small group of economies that are consistently slow.

Actions taken and lessons learned

MFA tries to keep the pre-clearance request approval process efficient by only checking each name against a database of visa violations, and otherwise trusting the judgment of the home economy so that approval can be quickly granted in most cases.

Future priorities

MFA would be interested in ABTC technical enhancements such as online lodgement and biometrics, but funding for such improvements may be difficult to procure. MFA also expressed support for the creation of a technical support group to provide training for capacity building.

3.2 Moderate adoption cases

Moderate adoption economies face fewer volume pressures than high adoption economies but most tend to be a little further behind on the learning curve and still working to optimize services with more limited resources for their current client bases.

3.2.1 Indonesia

Implementation of ABTC scheme

To date Indonesia has produced few ABTC holders relative to the size of its population and economy, giving the scheme enormous future growth potential.

As with certain other APEC economies, Indonesia's Directorate General of Immigration (DGI) requires applicants to obtain certification from an approved

business association (KADIN Indonesia is a major provider of this service) as a condition of their eligibility for the card.

Indonesia: Key Information ⁷	
Date joined the ABTC scheme	2002
Economy Population	253,609,643
# of cardholders (as of 4.6.14)	2,700
% growth in cardholders since 2010	81%
# of pre-clearances issued annually (in 2013)	53,000
Key actors for ABTC scheme	Directorate General of Immigration, KADIN Indonesia (Chamber of Commerce and Industry)
Average time for applicant to receive a card with all pre-clearance approvals	4-5 months
Average time to process a pre-clearance request	7-14 days

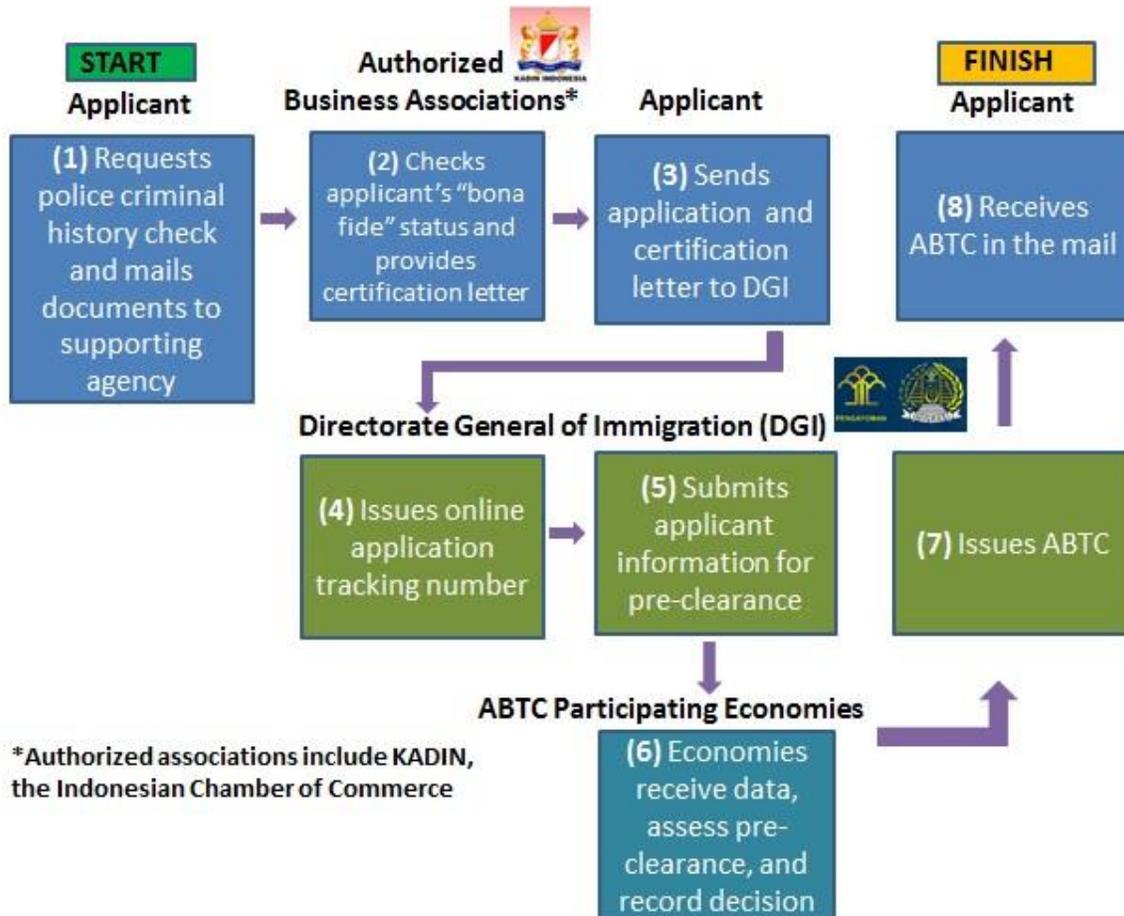
The application must be submitted in-person, though not necessarily by the applicant. In order to save time and expenses for government staff, domestic applicants for the ABTC are required to initiate and pay for a police background check themselves. Processing of the application prior to requesting pre-clearance from other economies can normally be completed within 15 – 30 minutes.

Card printing is currently performed by Australia on Indonesia's behalf, though Indonesia hopes to begin printing its own cards in 2015. One expected benefit of shifting production to Indonesia is that the shorter distance will better enable DGI to provide clients with an interim card while they are waiting for their new passport and updated ABTC to be issued, since currently the distance involved between Australia and Indonesia make it infeasible to offer such a service. In addition, DGI would be able to assume responsibility for any printing issues such as ink quality, rather than relying on a third party to solve any issues that arise.

⁷ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Directorate General of Immigration of Indonesia

Process Flow

Figure 5: Key steps of domestic ABTC application process flow



Impact on business travel experience

So far, the card has mainly seen use by executives from larger firms due to the wealth requirement for applicants (USD \$50,000), which may preclude some applicants from small- and medium-sized enterprises. Business executives who responded to an online survey noted that they had an overall positive view of the ABTC scheme, but found the wait times for card applications and renewals to be unreasonable (estimates of the wait times varied among respondents and interviewees from 3-4 months to 6-8 months).

For Indonesian passport holders, visas are normally required for entry into 11 of the 21 APEC economies, so the visa component of the ABTC provides a strong benefit for many clients. Staff from KADIN Indonesia emphasized that the card is particularly useful to businesspeople traveling with government officials as part of a trade mission, since the government officials are already using priority lanes.

Challenges

- **Length of time for pre-clearances:** Like many other economies, clients are concerned about long wait times for the pre-clearance process.

- **Card quality:** The quality of the ABTC could be improved. The color on the cards often “bleeds” or “runs,” resulting in an inconsistent look across cards that could raise questions about authenticity.
- **“At-the-border” issues:** Similar to clients from some other economies like Peru, Indonesian clients have faced intermittent problems entering certain economies using their ABTC, due to their cardholder status not being recognized by the immigration computer systems in those economies. This typically occurs in economies where the ABTC itself is treated as a visa, such as Australia and New Zealand. Issues may occur in cases where a client waiting for pre-clearance approvals first obtains a separate visa for travel to the economy in question, and then receives pre-clearance approval from that economy before the date of travel, potentially causing a conflict with the preexisting visa.

Actions taken

In October 2014, Indonesia enabled the functionality to allow ABTC applicants to check the status of their pre-clearance approvals online, which has improved the transparency of the application process and has provided increased convenience for applicants.

Future priorities

DGI staff have expressed an interest in assuming responsibility for card printing, which is currently performed outside of Indonesia.

3.2.2 Japan

Implementation of ABTC scheme

Administration of the scheme in Japan is heavily focused on the Ministry of Foreign Affairs (MOFA), which reviews and approves the domestic applications and also vets pre-clearance requests. Although the Support Council for ABAC Japan (SCABAC-J) is very active in advocating for ABTC-related business interests in the BMG, the private sector has little direct involvement in the administration of the scheme in Japan.

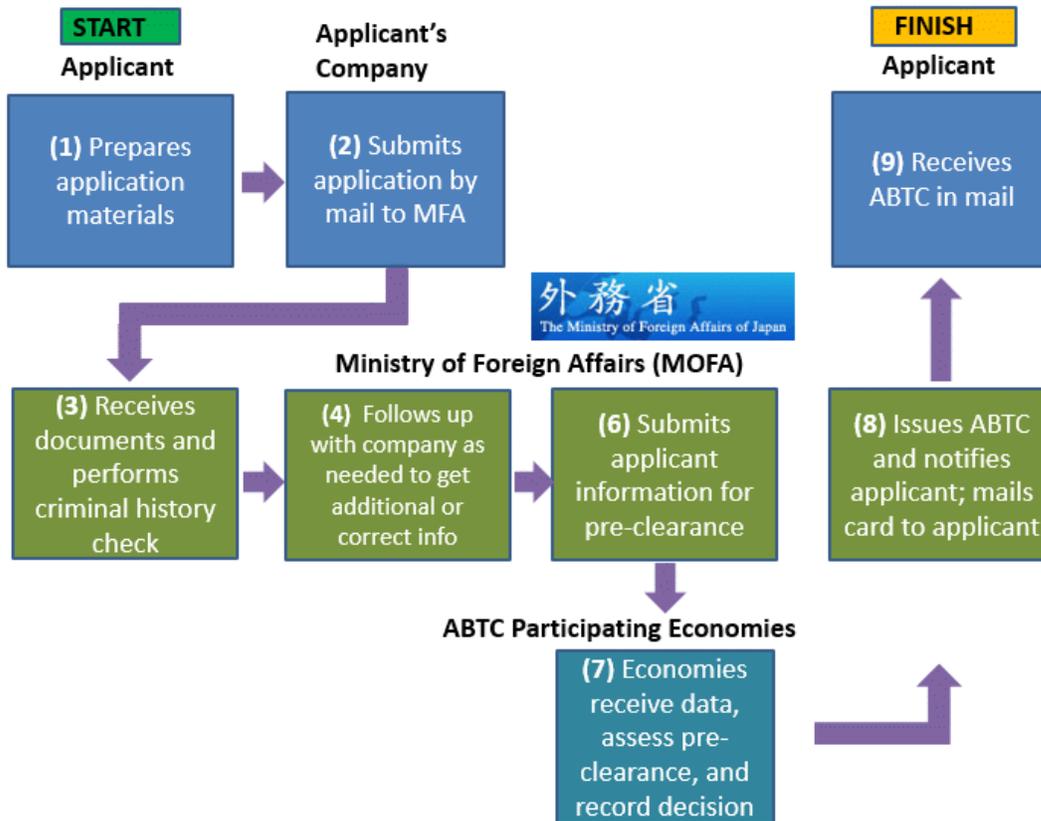
Japan: Key Information ⁸	
Date joined the ABTC scheme	2002
Economy Population	127,338,621
# of cardholders (as of 9.7.14)	7,073
% growth in cardholders since 2010	178%
# of pre-clearances issued annually (year ending March 2014)	57,958
Key actors for ABTC scheme	Ministry of Foreign Affairs (MOFA),
Average time for applicant to receive a card with all pre-clearance approvals	5-6 months
Average time to process a pre-clearance request	20 days

Companies or their employees submit paper-based applications to MOFA. MOFA has three staff members dedicated to both the processing of domestic applications and pre-clearances.

⁸ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Ministry of Foreign Affairs of Japan

Process Flow

Figure 6: Key steps of domestic ABTC application process flow



Impact on business travel experience

Japanese cardholders were appreciative of the benefits provided by the card, but found these benefits to be modest and therefore substantially offset by the inconveniences of the lengthy pre-clearance waits and renewal processes. SCABAC-J noted that Japanese citizens already have visa-free access to most APEC economies and, as normal immigration inspection lanes at most APEC airports are relatively quick, APEC fast track lanes typically provide a modest advantage at best.

Challenges

- MOFA's biggest challenge has been the time required to process domestic applications, which averages more than one month. Factors contributing to this challenge include staff resource limitations and the need to follow up with applicants for insufficient supporting documents.

Actions taken

MOFA is currently considering changes to its ABTC processes. MOFA allows clients to submit renewal applications six months in advance of ABTC expiration dates to encourage early application and reduce the risk of any lapse in benefits during the renewal process.

Future priorities

MOFA expressed strong support for most current BMG proposals, such as the 3 to 5 year extension, and would be very interested in some technical measures to resolve staff resource constraints such as establishing online lodgement and outsourcing, although such measures require further elaborate consideration of political and technical issues.

3.2.3 Malaysia

Implementation of ABTC scheme

Malaysia's implementation of the ABTC scheme relies on cooperation across a number of government and industry actors. Six of Malaysia's major manufacturing and service industry organizations, as well as a number of government agencies, are responsible for collecting and verifying of "bona fide" applicants for the ABTC, and there is a high level of interest from both industry and government to improve the ABTC application process.

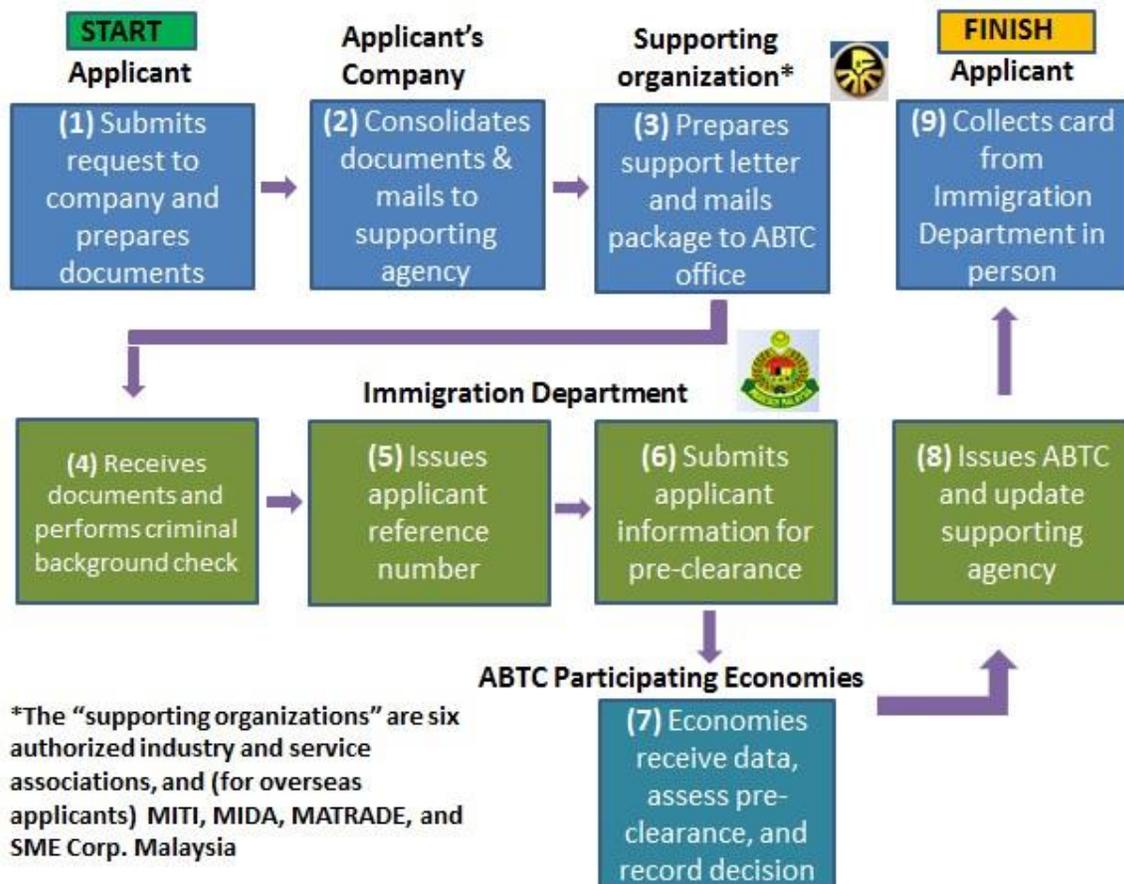
Malaysia: Key Information ⁹	
Date joined the ABTC scheme	1999
Economy Population	30,073,353
# of cardholders (as of 16.5.14)	8993
% growth in cardholders since 2010	117%
# of pre-clearances issued annually (year ending February 2014)	60,000
Key actors for ABTC scheme	Immigration Department, Federation of Malaysian Manufacturers, and other industry associations and public agencies
Average time for applicant to receive a card with all pre-clearance approvals	35-45 days
Average time to process a pre-clearance request	14-30 days

Once an applicant has been verified by an industry association or government agency, the association then sends the application packet to the Immigration Department's ABTC office. After the pre-clearance process is completed, the applicant or an authorized representative then returns to the Ministry to request that the card be printed. Applicants can also request an interim card after a minimum of 15 economies have given pre-clearance.

⁹ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Immigration Department of Malaysia

Process flow

Figure 7: Key steps of domestic ABTC application process flow



Impact on business travel experience

The general consensus among Malaysian actors appears to be that the application process for domestic clients is streamlined and well-received by clients, however, two major issues concerned most interviewees: the length of time to receive a card (based on pre-clearance approval by other economies), and issues with printing ABTC, such as shortages of card stock, which have sometimes delayed issuance of new ABTC to clients.

Challenges

- **Printing:** Delays in shipments of cards from the vendor serving the Immigration Department, and also possible end-of-life issues for the printers, have caused recent shortages of card stock, which have led to longer wait times for ABTC cards for some clients.
- **Communication:** Since there are many actors involved in Malaysia's ABTC application process, some interviewees noted that there is room for improvement in communication within Malaysia between the actors involved in the ABTC process, since information about new policies or issues is sometimes not fully shared.

Actions taken

- Recent reforms to the partnerships between government and industry associations have significantly sped up the domestic application process by streamlining the number of approved bodies that can issue a support letter to confirm an applicant's "bona fide" status as a business traveler. Previously it took almost a year for applicants to receive a card, and but now this time has fallen to 2-3 months and the cost of submitting ABTC applications has been reduced as well. The reforms also clarified the eligibility requirements for the card to prevent inappropriate applications by artists and other non-business travelers, which has had a positive impact in reducing the number of illegitimate applications.
- Based on its current challenges with printing supplies, Malaysia is taking some actions to look into ways to improve the printing process, such as localizing printing supplies to reduce costs.

Future priorities

There is strong support from the Immigration Department and industry associations for policies which might reduce costs and the work burden on economies, such as streamlining the renewal process for ABTCs, and more efficient communications and information sharing among economies to enhance faster clearance.

Industry members are very much looking forward to the extension of card validity from 3 years to 5 years. Industry members would also support online applications for ABTCs, though the "back end" support process would also need to be moved online to coordinate the application process effectively between different supporting organizations. Moving some or all of the application process online would be especially helpful for clients from outlying islands, because currently they must physically travel to the Immigration Department to pick up the card, which can be time-consuming and potentially costly.

Malaysia is currently conducting a survey among APEC economies about the ease of use of the ABTC system and issues that other economies face in systems integration and similar issues. The intent is to identify potential areas where improvements to the system can enhance automated functions and reduce workloads.

3.2.4 New Zealand

Implementation of ABTC scheme

Immigration New Zealand (INZ) handles the ABTC application process in-house, and individual staffers with responsibility for processing ABTC applications have discretion to approve or deny domestic applicants. Applicants may request an interim card to be issued when up to five priority economies approve pre-clearance for an applicant.

New Zealand: Key Information ¹⁰	
Date joined the ABTC scheme	1999
Economy Population	4,401,916
# of cardholders (as of 13.8.14)	10,000
% growth in cardholders since 2010	53%
# of pre-clearances issued annually (year ending 13.8.14)	61,573
Key actors for ABTC scheme	Immigration New Zealand (INZ)
Average time for applicant to receive a card with all pre-clearance approvals	3-6 months
Average time to process a pre-clearance request	14 days (max)

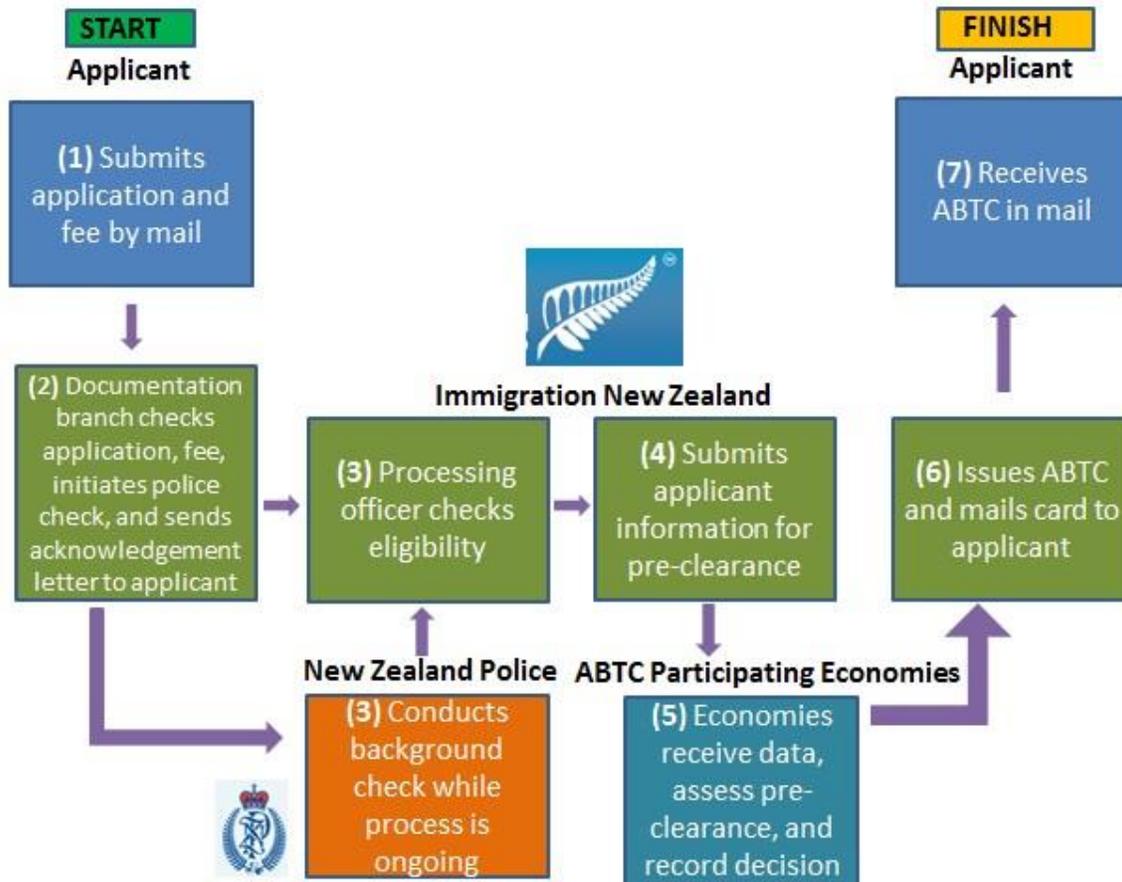
Since the ABTC application for pre-clearance is treated as a visa application, INZ organizes pre-clearance applicants into those who are required to obtain a visa to visit New Zealand, and those who are not. When processing a pre-clearance application for citizens of an APEC economy for which visas are required, INZ will create on its system both an ABTC application and a standard visa application.

INZ is currently undergoing a major IT upgrade. One side effect of this IT change is the potential to create an online lodgment system for the ABTC scheme, but INZ has not yet determined when that capability might be in place. This change, when it occurs, is expected to offer significant efficiency gains, especially from a client perspective. In the meantime, INZ is planning to roll out an e-lodgment tool specifically for one category of visa applicants that is anticipated in late 2014.

¹⁰ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Immigration New Zealand (INZ)

Process flow

Figure 8: Key steps of domestic ABTC application process flow



Impact on business travel experience

While acknowledging the benefits of the card, industry stakeholders expressed concern that lengthy delays in the pre-clearance process reduced the effectiveness of the scheme overall. Clients urged that APEC make it a priority to de-link the ABTC from its owner's passport. The New Zealand APEC Business Advisory Council (ABAC) is also eager for INZ to implement an online lodgement capability that would obviate the need to gather and mail the application paperwork.

Challenges

- **Length of time for pre-clearances:** It currently takes New Zealander applicants six months to receive pre-clearance approval from all 19 fully-participating APEC economies, or 3-4 months if certain economies are not facing issues or delays. This lengthy wait time, though attributable to only a few economies, affects all equally and makes it difficult to justify expending additional resources on processing operations.
- **Need for greater transparency for pre-clearances:** Within the ABTC system, INZ receives a foreign pre-clearance applicant's name, date of birth, and passport, but does not receive any information about their company or line of

work. It does not even receive their photograph. This contributes to uncertainty on the part of INZ as to whom it is approving.

- **Communication among APEC economies:** INZ expressed interest in the clarification of official communication channels and improved response times from official points of contact among APEC economies that can assist with issues related to ABTC applications or to the use of the card by clients.
- **Printing issues:** The printer that INZ uses for ABTCs requires frequent maintenance due to age and software issues. When a domestic ABTC applicant voluntarily terminates the pre-clearance process and requests issuance of a card without approval from all 19 fully-participating economies, the printer automatically prints another card each time one of the remaining economies approves the applicant. This results in considerable waste.
- **Need to improve efficiency of application process:** The lack of an online lodgement system was cited by certain industry stakeholders as a key factor in their decision not to apply for the ABTC. The need to gather and submit paper copies of the relevant application materials was said to be prohibitively time-intensive.

Actions taken

Dedicating full time staff to ABTC processing has helped INZ to establish and meet its own internal processing time targets.

Future priorities

As mentioned earlier, INZ has an IT system upgrade scheduled for 2014, and although there is no official estimate for when an online lodgement capability will be added for use by domestic ABTC card applicants, the upgrade will be performed with consideration for INZ's request to enable such a capability in the future.

3.2.5 Papua New Guinea

Implementation of ABTC scheme

Applications for ABTCs are submitted by applicants to the Immigration and Citizenship Service Authority (ICSA) office, in person, by mail, or via a third party visa agent.

ICSA personnel then review the application to determine whether it has met all of the necessary requirements and passed security checks. The application will be approved and uploaded to the ABTC system for pre-clearance if it passes this review.

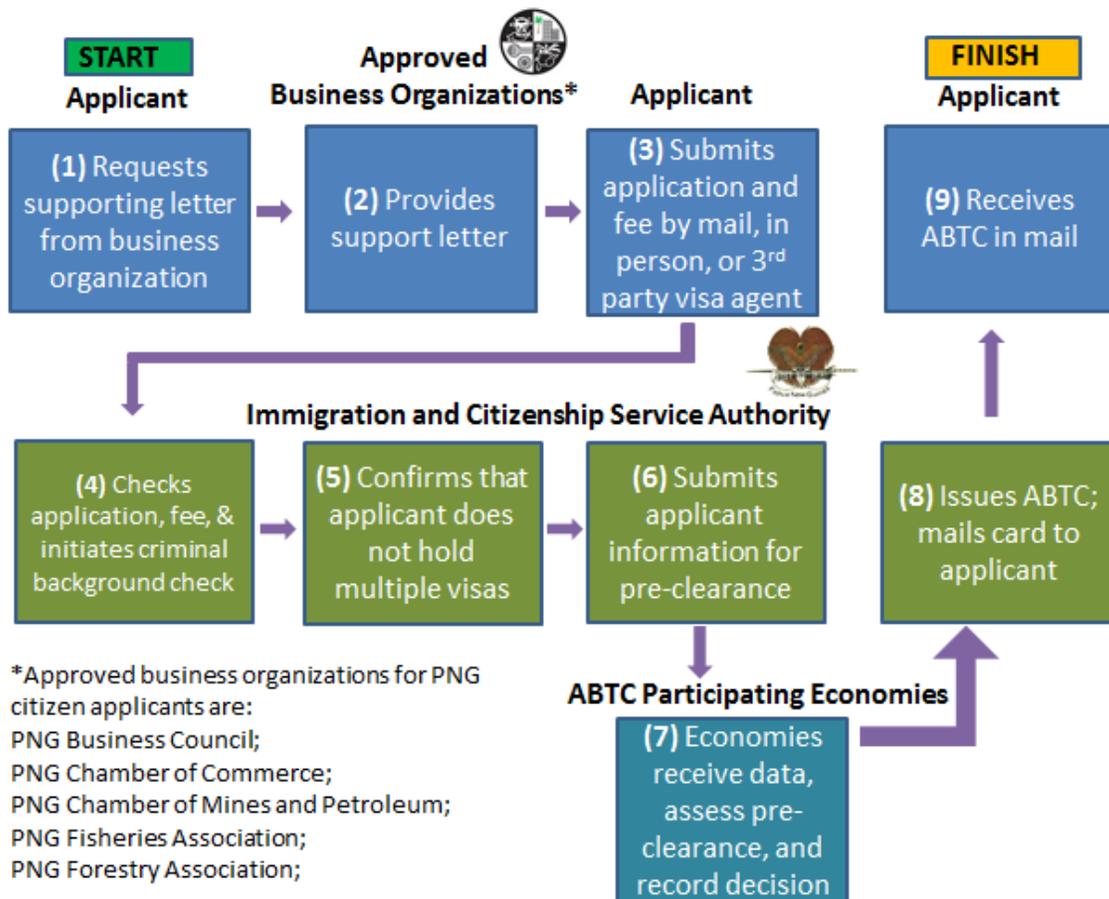
Papua New Guinea: Key Information ¹¹	
Date joined the ABTC scheme	2003
Economy Population	6,552,730
# of cardholders (as of 11.4.14)	69
% growth in cardholders since 2010	214%
# of pre-clearances issued annually (in 2013)	33,000
Key actors for ABTC scheme	Immigration and Citizenship Service Authority (ICSA)
Average time for applicant to receive a card with all pre-clearance approvals	30 days
Average time to process a pre-clearance request	26-27 days

¹¹ Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Immigration and Citizenship Service Authority (ICSA)

Due to the relatively low volume of domestic applications, Papua New Guinea relies on Australia to print ABTCs. Cards are now received within one month whereas they were previously delivered in four to five months.

Process flow

Figure 9: Key steps of domestic ABTC application process flow



Impact on business travel experience

Papua New Guinea receives 4,000 to 5,000 pre-clearance requests a month but only approximately 500 cardholders visit Papua New Guinea each year. Roughly 99 percent of ABTC holders who visit Papua New Guinea are from Australia and New Zealand.

Industry stakeholders expressed frustration with pre-clearance approval wait times. They suggested that pre-clearance requests could include an automatic cutoff point for economies to respond, in order to push slower economies to clear applications in a timely manner. Industry stakeholders also emphasized the need for more transparency throughout the application process. Like applicants in many economies, applicants are able to check their status online but don't otherwise have access to information about when they can expect to receive a card.

Challenges

- **Growth in pre-clearance requests:** Papua New Guinea expects that it will need to add additional staff to its ABTC processing team as the volume of pre-clearance requests grows.

Actions taken

In 2013 the ICSA received technical assistance from Australia, which provided advanced training to new ICSA employees on how to optimize operation of the ABTC system. This training helped the ICSA staff to work more efficiently and significantly improve its processing times, for example by using batch processing to quickly approve multiple foreign pre-clearance requests. The ICSA is now able to internally provide this training to new employees and also provides refresher courses on a quarterly basis.

PNG is currently reviewing its legislation on Migration and Passport Acts in the hopes that revisions to the legislation will address some of the challenges that have been expressed by other member economies.

Future priorities

Papua New Guinea is currently discussing a number of issues with Australia, including the renewal of Australia's support for the ICSA's Border Management System, which may include upgrades to interconnect the ABTC system with the ICSA's systems. This would allow the ICSA to reduce pre-clearance processing times by automating certain processes such as background checks on foreign ABTC applicants who are residents in Papua New Guinea.

3.2.6 Peru

Implementation of ABTC scheme

Peru has been a participant in the ABTC scheme since 2002. Most of the authority for vetting domestic applicants is delegated to six business associations. In 2013, these associations sponsored 746 applicants, with 612 applications submitted by COMEXPERU, an association that supports Peru's foreign trade.

The associations also serve as the continuing point of contact for any applicants that they have certified, in

Peru: Key Information ¹²	
Date joined the ABTC scheme	2001
Economy Population	30,147,935
# of cardholders (as of 16.5.14)	1,815
% growth in cardholders since 2010	42.2%
# of pre-clearances issued annually (year ending 20.7.14)	55,144
Key actors for ABTC scheme	Ministry of Foreign Affairs (MOFA), COMEXPERU
Average time for applicant to receive a card with all pre-clearance approvals	3 months
Average time to process a pre-clearance request	3 months

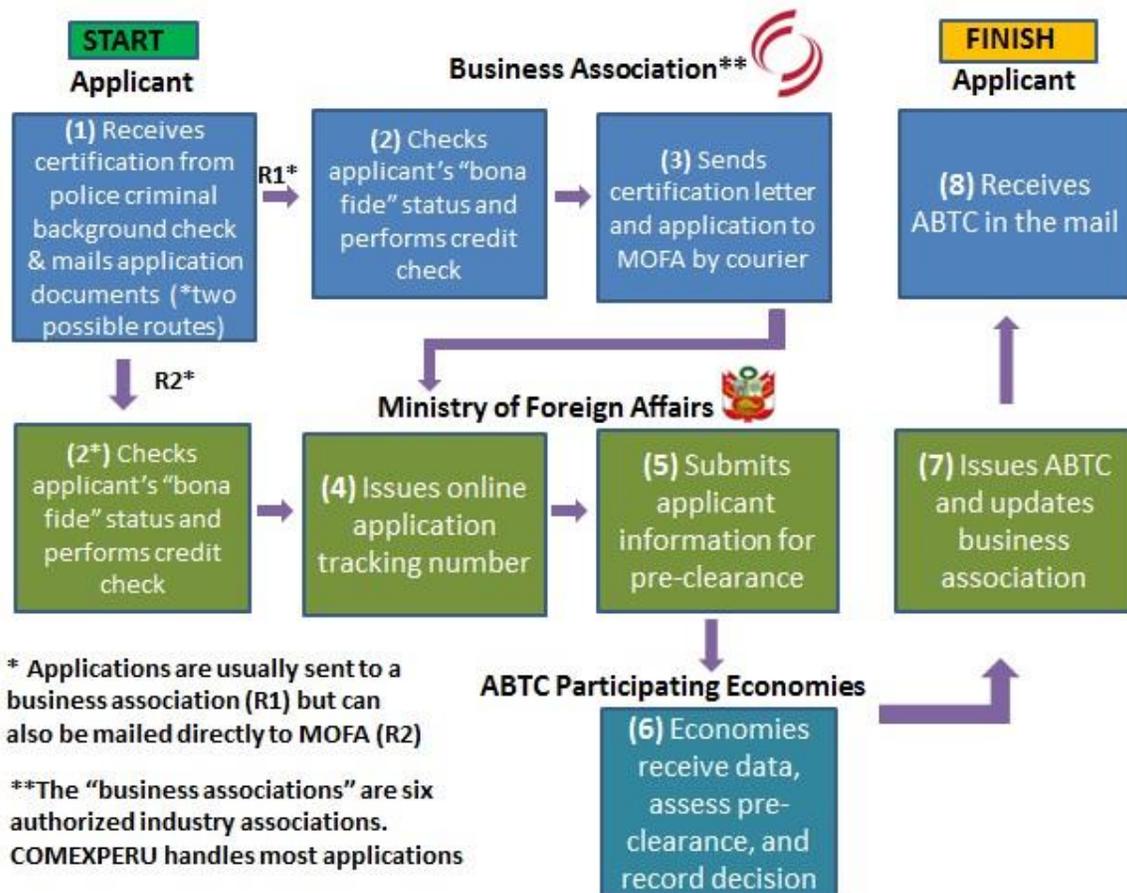
¹² Apart from 2013 population figure obtained from World Bank (<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by Ministry of Foreign Affairs (MOFA) of Peru

case the applicants have any questions or concerns about the process, and will remind existing cardholders three months in advance of the card expiration date that they should begin the renewal process.

In order to contain the high cost of card materials and printing, MOFA forgoes interim ABTCs and only issues cards only when all 19 economies have granted pre-clearance approval or when the applicant voluntarily terminates the pre-clearance process.

Process flow

Figure 10: Key steps of domestic ABTC application process flow



Impact on business travel experience

In general, Peruvian cardholders are from Lima and tend to represent one of several growing sectors of Peru's economy. The services industry (tourism, banking, legal services, etc.) represents about 33 percent of all applicants. Manufacturers account for around 21 percent, importers 19 percent, and mining companies 12 percent. China is the top business travel destination for clients.

Both government and industry stakeholders expressed a strong interest in normalizing the validity period of the ABTC for all economies that have provided pre-clearance. In particular, clients have faced some issues where their effective visa for an economy has

been terminated due to an upcoming passport expiration date, despite holding a valid ABTC (the economies' validity period doesn't match the period stated on the card).

It takes three months on average for Peruvian applicants for the ABTC to receive pre-clearance approval from all 19 participating APEC economies and then receive their card, and many survey respondents reported waiting as long as six months for cards. Consequently, clients emphasized that the ABTC scheme needs increased transparency and efficiency, such as providing more information about application status and reducing the wait to receive a card.

Challenges

- **Validity period issues:** The pre-clearance approvals reported to an applicant on the BMG website do not always match the approvals received by MOFA. There seems to be a lag in the sharing of information across systems, which can add to the time an applicant must wait before issuance of their ABTC card. Also, upon arriving in a foreign economy some ABTC holders have found that, despite their cards showing they are pre-cleared for entry, they are in fact not. It is unclear if this problem results from an error in the ABTC system or in the computer systems used by immigration authorities.

Actions taken

MOFA requires cardholders to turn in their expired ABTCs when applying for a new card; this ensures that old cards will not be used for fraudulent purposes.

COMEXPERU reminds existing cardholders when their current ABTC is about to expire (about three months in advance) and encourages them to initiate the renewal process. This serves to minimize the time that clients must spend waiting to receive their new cards.

Future priorities

Both government and industry stakeholders expressed a strong interest in normalizing the validity period of the ABTC for all economies that have provided pre-clearance. Another system change that was encouraged to help speed up the application process was to have the ABTC system automatically notify governments when one of their applicants has been pre-cleared by all APEC economies.

3.3 Transitional economy case

3.3.1 The United States

Implementation of ABTC scheme

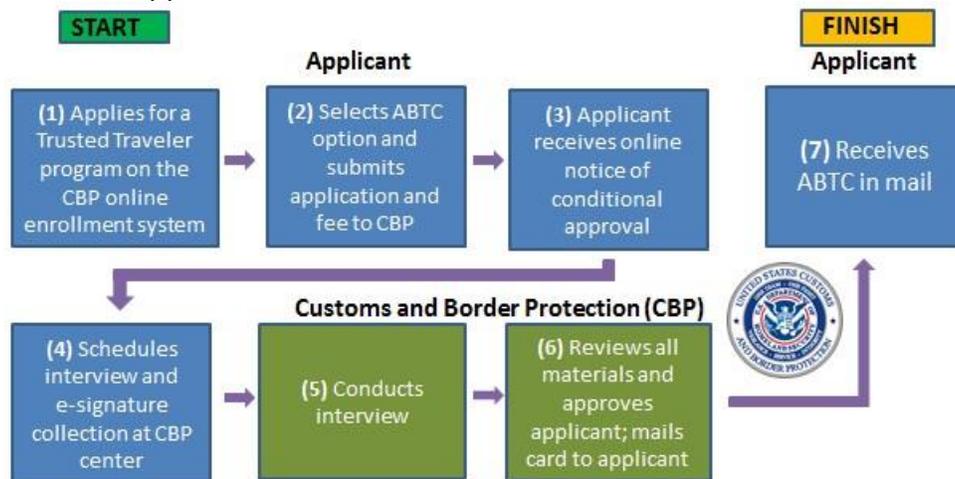
The United States joined the ABTC scheme as a transitional member in 2007, at which time it offered other APEC economies' ABTC holders expedited appointments for visa interviews at US embassies and consulates and access to APEC lanes at all US international airports, but did not issue cards or participate in pre-clearance processing. In June 2014 the United States began issuing US ABTCs to eligible US citizens.

The United States: Key Information ¹³	
Date joined the ABTC scheme	2007 ¹⁴
Economy Population	316,128,839
# of cardholders (as of 12.8.14)	834
% growth in cardholders since 2010	N/A
# of pre-clearances issued annually	N/A
Key actors for ABTC scheme	Customs and Border Protection (CBP)
Average time for applicant to receive a card with all pre-clearance approvals	N/A
Average time to process a pre-clearance request	N/A

The US ABTC Program is administered by the US Customs and Border Protection (CBP) via CBP's trusted traveler system called the Global Online Enrollment System (GOES). Members of current Trusted Traveler programs can apply for ABTC through the GOES web portal. Part of the application process to become a Trusted Traveler requires the applicant to undergo an interview at a CBP trusted traveler enrollment center. As the United States does not participate in the pre-clearance aspect of the scheme at this time, the "Valid for travel to:" section on back of the US ABTC card is blank.

Process Flow

Figure 11: Key steps of domestic ABTC application process flow for concurrent Trusted Traveler and ABTC applications



¹³ Apart from 2013 population figure obtained from World Bank

(<http://data.worldbank.org/indicator/SP.POP.TOTL>), all data provided by US Customs and Border Protection (CBP)

¹⁴ The US joined as a transitional member in 2007, and began issuing ABTC cards to citizens in 2014.

Impact on business travel experience

As of October 2014, clients from the United States have only four months of experience with the ABTC scheme, so client feedback remains very limited. Clients appreciate the time savings provided by use of fast track lanes in other APEC economies.

Challenges

Some clients expressed frustration that the US ABTC does not provide pre-clearance access to other economies, and urged that this benefit be added. A few clients reported having complications when trying to use fast track lanes in other economies. In some cases immigration officials at the border questioned the legitimacy of the card and/or denied access to the fast track lane because the back of the United States card is blank.

Actions taken

The United States is still assessing the initial launch of card issuance.

Future priorities

CBP has expressed interest that the end-to-end review address modernizing the ABTC scheme and clarify application issue redress mechanisms and privacy protocols and safeguards for ABTC holders' data.

4 Priority issues

This chapter describes key current proposals, issues, and challenges which are currently having or may soon have a sizable impact on the performance of the ABTC scheme.

4.1 Extension of ABTC card validity from 3 to 5 years

During the first half of 2014, BMG member economies agreed that extension of the validity period of the ABTC card from the current validity of 3 years to 5 years is a worthwhile goal. At the 2014 SOM 3 meeting in Beijing, BMG members agreed to move towards implementation of a card with 5 year validity, citing the aspirational date of August 12, 2015, while acknowledging that a decision from the APEC Budget and Management Committee had yet to be made on the necessary APEC project proposal to handle passport changes in the ABTC Processing System. The BMG will also need to amend the ABTC Operating Framework to extend the validity date to 5 years within the document. The extension of the card's validity period is anticipated to improve client experiences by reducing the frequency that clients must apply for new cards, which will also help economies by reducing related staffing and printing costs.

Some BMG members have noted concerns regarding the extension of validity, such as the potential for abuse of the integrity of the ABTC scheme by cardholders whose eligibility changes over 5 years. As mentioned above, another consideration to this potential extension is the handling of passport changes, which under current practices require reapplication or the issuance of a card with the new passport number when passports expire, and therefore would in many cases continue to limit the validity of the card to less than maximum five year period allowed. Implementation of system improvements and policy changes may be needed to address this issue.

In a related issue, staff from several economies, including Peru's COMEXPERU (the trade association which sponsors the majority of Peruvian ABTC candidates), have emphasized the need to fix the ABTC's validity at a specific period regardless of when its owner's passport expires, so that clients don't face any issues at the border when their cards' stated validity doesn't match the internally noted validity period for some economies.

Stakeholder views

There is general agreement among economy staff members and clients that the validity extension from 3 to 5 years will be beneficial for the ABTC, although some economies have noted concerns about the potential impact on scheme integrity.

4.2 Impact of passport changes

The current system for noting passport changes in the core ABTC system is time consuming for economies, and there is room for improvements which have been discussed by ABTC member economies. The Australian Department of Immigration and Border Protection (DIBP) has estimated that implementing passport changes to the core ABTC system to streamline passport change approvals will cost approximately US\$300,000. DIBP will further brief on the changes required in the future, and has noted that economies will have the ability to individually set their preference for

approval of passport changes to be automatic or manual. This change will ideally be implemented in tandem with the extension of the ABTC validity from 3 to 5 years.

In the long term, a card-less ABTC scheme (discussed later in this section) could eliminate many of the current issues with passport changes by having the ABTC data included in a partitioned passport chip, which would also eliminate the need to print new ABTC cards to reflect a change in passport number. In the short term, it may be possible to resolve some of the above issues through removal of the passport number from the printed ABTC. However, border control officers in multiple economies have indicated that they would not support the de-linking of ABTCs from their owners' passports, citing security concerns due to the need for visual inspection of the card, and changing the status quo could therefore cause significant issues for those economies.

Stakeholder views

As mentioned above, views on whether the passport number should be removed from the card have been mixed. ABTC staff members from some economies, such as New Zealand and Singapore, have supported removing the passport numbers from the back of the ABTC, while others, such as staff from Indonesia and Thailand, have indicated that they would not support the de-linking of ABTCs from their owners' passports, citing security concerns due to the need for visual confirmation of the number.

4.3 Pre-clearance and renewal process

4.3.1 Pre-clearances

The pre-clearance stage of the application process poses the most risk for delays for clients, since the slowest economies to approve the card have a disproportionate influence on the final approval times. More than any other topic, government and industry stakeholders have expressed a strong interest in seeing pre-clearance and renewal processes become more streamlined and faster. The report will consider some possible approaches for achieving these goals, which are laid out in the process recommendations in Chapter 5.

One suggestion that was raised by stakeholders was to reduce the burden on economies' processing staff by offering clients the option to pre-select which economies they wish pre-clearance from, and to send pre-clearance requests to only those economies. This approach would differ from the typical current interim card procedure in that economies that are not chosen would not need to provide pre-clearance, reducing the burden on their staff. In New Zealand, for example, Immigration New Zealand (INZ) processed 61,573 pre-clearance applications for the year through August 2014, a rate of more than 1,100 pre-clearance applicants each week, and yet to date only 1.5% of the pre-clearance applicants INZ has approved have actually visited the economy.¹⁵

In addition, stakeholders suggested that there is room for improvement in cross-economy communications, through actions such as updating email contact lists for the primary point-of-contact for each economy's ABTC staff, and agreeing on mutual guidance for communication protocols and response times for all economies. Prompt

¹⁵ Immigration New Zealand, statement at BMG Plenary, SOM 3 conference, 2013

communications are critical to resolving questions and requests for additional information concerning pre-clearance applicants.

Stakeholder views

Government staff members in economies such as Papua New Guinea and Japan were supportive of the suggestion to allow applicants to limit the number of economies who need to process their application rather than applying to all economies, which could allow them to focus on processing pre-clearance requests from applicants who would be likely to visit in the future. However, several issues have also been raised with the proposal. Speakers at a breakout session during the SOM 3 BMG meetings noted that it would require high level political consideration, especially insofar as providing the option to choose only certain economies may run counter to the APEC spirit of inclusivity, and the policy could possibly require revision to the ABTC Operating Framework document.

4.3.2 ABTC card renewals

To reduce the inconvenience for clients caused by delays between applying for a new card and receiving a card, some economies provide clients with notice of card expiration 3 – 6 months in advance, so that clients can start the application process sooner and avoid a lapse in benefits.

Card renewals can also be simplified on the client side of the application by allowing clients to fill out an abbreviated form for renewals if most of their biographic circumstances remain unchanged. Economies with online lodgement could also save previously submitted information and allow cardholders in good standing to simply confirm that previously submitted information has not changed, rather than require all data to be reentered with each renewal.

The extension of the ABTC card's validity from 3 to 5 years is also expected to help mitigate client frustration at time spent on renewals, but clients made clear that this step alone does not solve the problem.

Stakeholder views

In general, there is often a disconnect between economy processing staff, who view the ABTC as a travel document similar to a passport or visa, and clients, who view the card as a convenience that they have gone through a detailed process to earn (similar to a driver's license, for example). So while processing staff see renewals as two separate card applications by an applicant whose qualifications may have changed in the past 3 years, cardholders often feel a sense of frustration to repeat the process when they already qualified for the card.

Among economy processing staff, views on policies related to card renewals vary. Peru and Indonesia both provide clients with a notice of card expiration 3 – 6 months in advance, while staff from several other economies commented that the ABTC is a privilege, not a right, and that there should be no need to notify clients of an upcoming card expiration when the staff don't do so for passports or other travel documents.

4.4 Online lodgement and status updates

Currently, only a few economies such as Singapore and China offer applicants the opportunity to apply for an ABTC through an online system rather than in-person or by mail. The United States also offers provides an online application process, after which an applicant who is not currently part of the Trusted Traveler program must visit a CBP office for an in-person interview to complete his/her application. Other economies, such as Indonesia, have noted that while they do not yet have an online application system, this capability could be implemented without undue burden on their ABTC staff resources.

Most BMG members would eagerly anticipate an online e-ABTC platform that allows easy transfer of data into the core ABTC system without manual re-entry of data (a challenge that Singapore and China are currently facing in managing their online lodgement platforms), and would view such a platform as a significant step forward in reducing staff time spent on data entry, as well as providing ease of access for clients. Australia's DIBP has been investigating possible cost and time estimates for an online lodgement platform.

Stakeholders have suggested that the ideal approach for online lodgement could be a shared platform, to support economies with less capacity for developing their platforms, and also to encourage more homogeneity among BMG members' data requirements. One possibility would be to develop this platform as a single back-end for online lodgement with separate modules for different economies, which would support economies with less capacity to develop separate systems. Alternatively, a web platform could be developed to host links to separate online lodgement systems developed by individual economies, which would enable economies to adopt online lodgement at their own pace. However, in order to implement such an approach, economies must first determine which data requirements will be necessary to collect as part of the platform, and will need to create a roadmap and cost estimates and consider privacy, data and legal restrictions.

In addition, the business community, through the APEC Business Advisory Council (ABAC), has indicated its interest in seeing APEC member economies provide improved online services to facilitate online applications and distribution of information about the scheme, such as access to online ABTC application status updates for economies that have not yet implemented such updates, and more detailed or dynamic information about expected wait times for card applications.¹⁶

Stakeholder views

There seems to be general agreement from both clients and economy staff members on the potential benefits of online lodgement. Some economies, such as Australia, have been particularly active in exploring the costs and potential for widespread implementation.

¹⁶ APEC Secretariat, "Report on the ABAC 2010 Recommendations," Pg. 12, May 2011, URL: http://www.iisd.org/gsi/sites/default/files/g20lib_apec_2011_reportabacrecommends.pdf

4.5 Card-less and biometric card approaches

As one government official expressed concern, although the ABTC scheme “provides access to express lanes and visa free access to many countries, as many economies are moving towards automated biometric arrangements for their own citizens and for cohorts from other countries, the actual facilitation of travel is beginning to be lost with the scheme in its current form...in 5-10 years, most of the world will have some kind of automated border processing, and [we] don’t want the ABTC to be a dinosaur in that future world.”¹⁷ Similar views were expressed by both industry and government actors from several economies, revealing a common concern that the current ABTC scheme might become outdated if it does not adapt to the future direction of travel facilitation technology.

Given the rapid pace of technological change, the ABTC scheme is faced with two distinct opportunities to improve on its aging technological and processing base: adopting a more technically advanced, “biometric card” with a chip containing the relevant traveler information about clients, or a “card-less” approach in which the physical ABTC is eliminated and replaced by either an e-visa (with a possible physical component such as a sticker for a passport) or as a partitioned section of an electronic passport.

Both approaches offer increased convenience for clients and have the potential to reduce application processing time. The card-less approach would eliminate the inconvenience for clients of waiting for a new card to arrive in the mail, and both approaches could obviate the need to replace cards when passports expire. For ABTC authorities, both approaches have the potential to reduce the strains on the processing base for the ABTC by reducing or eliminating the need to print physical cards. Both would also preserve the integrity of the card by making it more difficult to counterfeit an ABTC.

However, there are currently significant hurdles to the widespread adoption of either approach. Both would require significant investment in new capabilities by member economies, and the card-less approach in particular would require the adoption of electronic passports with unified standards by all BMG members, as well as new ways to easily keep clients updated about their current status (such as their card validity period and the economies which have granted them pre-clearance) and to identify ABTC clients at the border to determine eligibility for fast track lanes.

The collection of biometric data in particular raises concerns regarding client data privacy, and could negatively impact the appeal of the card, since clients would need to travel in person to have their biometric data collected. Many economies have legal restrictions on the types of data that could be collected, and would need to invest in the capabilities for collection as well.

Stakeholder views

Overall, the apparent consensus expressed by stakeholders was that both the card-less and biometric card approaches face many technical hurdles as well as challenges in

¹⁷ Stephen Allen, First Assistant Secretary, Department of Immigration and Border Protection, in-person interview, 2014

data compatibility and sharing. In either case, economies would still need to agree a common standard for data collection and compatibility as well as a timeline for adoption, based on when it would be financially feasible for all economies to move towards this capability. As noted by INZ and other economies' ABTC staff, whatever programmatic changes are needed, the BMG must actively explore what the next steps should be, and should set goals and deadlines by which to achieve them.

4.6 ABTC system: technology improvements and review

Some economies have expressed interest in exploring refinements to the core ABTC system to make it more efficient and user-friendly for staff. Such changes might include increased process automation, such as batch uploading of pre-clearance results and the automated input of dates in the ABTC system.¹⁸ Other possible features include alert and reminder messages, and enabling more customized features such as multiple permission levels for staff based on seniority.

Given the large number of changes suggested by stakeholders, there is likely to be value in conducting a review of the current core ABTC system to determine the best way forward, such as whether it is better to implement multiple minor upgrades to the current system or consider an alternate platform. This is especially important given the potential future need to support some of the capabilities discussed earlier in this chapter, such as online lodgement of applications.

Two issues were frequently mentioned by stakeholders. First, the process to grant approval for foreign pre-clearance requests requires a number of steps to accomplish, and some economies have requested consideration of whether batch uploads of pre-clearance results into the ABTC system would be possible for all economies.

Second, correcting minor data entry mistakes after an application request has been submitted can be a tedious manual process for ABTC processing staff, since applications can only undergo limited changes after they have been submitted for pre-clearance by other APEC economies. Often this means that processing staff must instead create a duplicate application and delete the old application in order to correct the issue with the original application. As a result, processing staff are interested whether validation checks on points such as correct data format or passport validity could be included in the batch excel/csv file used by all economies, so as to mitigate the number of data entry mistakes, and avoid duplicate applications with new passport validity when the previous application is still being processed.

A more complete list of suggestions for incremental improvements is addressed in Chapter 5.

Stakeholder views

Processing staff from nearly all case study economies raised valuable suggestions for improving the core ABTC system. Staff members from Singapore, Indonesia, Malaysia,

¹⁸ Currently the entry option for dates doesn't specify the term clearly, which has led to mistaken entries by staff. The suggested change would prevent economies that are engaged in processing pre-clearance requests from missing applications which have the wrong dates stated on the applications.

and Peru were especially interested in possible user friendliness and convenience solutions for the system.

4.7 Capacity building

Currently the BMG is considering a proposal from Australia's DIBP to implement a "capacity building group" to help develop multilateral capacity building among ABTC processing staff in all economies and support future recommendations for best practices. In the long-term, the goal of such a project would be to create ways for experienced member economies to provide more assistance across APEC to other economies, such as through training programs and exercises. DIBP has drafted a concept note for APEC funding to support ABTC multilateral capacity building over the next few years.

Based on feedback from stakeholders, there appears to be widespread interest in the capacity building proposal, albeit with the caveat that the availability of funding for such activities may be limited. One potential model for capacity building may be the training assistance which DIBP provided to staff at Papua New Guinea's Immigration and Citizenship Service Authority (ICSA) in 2013. Training in efficient ABTC processing practices was provided to new ICSA employees, helping the ICSA to significantly improve its processing times. The ICSA is now able to provide this kind of advanced training on its own to new employees and also provides refresher courses on a quarterly basis.

Another possible model for capacity building could be to set up regular workshops for ABTC staff on the sidelines of a technical conference on border control measures.¹⁹ A further solution that was proposed was to create a series of online training videos, available in multiple languages, which would provide specific best practices and processes for ABTC staff to learn from. In a related initiative, Canada has been developing a Client Service Framework for the ABTC, which could include the creation of a "guidebook" for ABTC processes that could serve a similar function in describing best practices for processing staff.

Stakeholder views

Most stakeholders seemed to view this proposal as a positive effort, though more details are needed about potential costs.

4.8 Client support

One suggestion from industry stakeholders in several economies was that they would appreciate clearer lines of communication about the ABTC scheme, especially for information on their application status or regarding any issues that occur at the border, such as a visa attached to the ABTC expiring ahead of the card's expiration. An ABTC client contact center could enhance client experiences by providing reliable support for various issues, and would reduce the burden on economies' ABTC processing staff.

Discussions on this topic with stakeholders focused on what roles such a client support center might fill. In broad terms, those roles could be:

¹⁹ For example, a potential conference could be the annual Border Management Conference organized by the International Organization for Migration (IOM) and the Asia-Pacific Smart Card Association (APSCA)

- 1) Application procedures and current status;
- 2) At-the-border issues;

However, stakeholders were divided on the best role for client support. Due to possible language issues, it was suggested that at-the-border issues might be best handled by a switchboard system to connect clients with their home economies. Stakeholders suggested that further discussion is needed among economies regarding the scope of possible responsibilities and the “appetite” among BMG members to fund such a center.

As mentioned during a technical presentation at the August 2014 SOM 3 meeting by Dr. Pratit Santiprabhob of Assumption University, if a central online lodgement system were implemented by BMG members, it would be wise to also implement a customer service center that could address online service issues.²⁰

Stakeholder views

Stakeholder opinions were generally supportive of the client support concept and its potential benefits for clients, however economies would first need to agree on the scope of possible actions and responsibilities and better understand the possible costs before committing firmly to any actions.

4.9 Issuance of ABTCs to permanent residents

Currently, Hong Kong, China is the only economy which is permitted to issue ABTCs to its permanent residents, which has been the case since the economy joined the scheme in 1998. At the August 2014 SOM 3 conference in Beijing, BMG members discussed a proposal from Mexico to allow all ABTC member economies to issue ABTCs on behalf of their permanent residents in cases where the resident is a citizen of another APEC economy.

Stakeholder views

The general consensus expressed at the SOM 3 conference was that the proposal would require further consideration, and economies would benefit from feedback from Hong Kong, China on its experiences with providing ABTCs to permanent residents. One potential issue that was brought up was that some BMG members only allow a single visa for visitors; so a permanent resident could face a complicated visa situation if the ABTC accidentally overrode his/her primary visa. Another issue that was raised was whether the economy of residency or the economy of citizenship would be responsible for vetting the cardholder. In many cases, the current challenges that permanent residents face in applying for ABTCs could be partially alleviated by the implementation of online lodgement across APEC economies, so that applicants could apply online to their country of citizenship.

COMEXPERU indicated its interest in allowing permanent residents in Peru to apply for the ABTC, given the large number of foreign CEOs at the head of Peruvian companies.

²⁰ Presentation by Dr. Pratit Santiprabhob – Associate Professor of Computer Science at Assumption University, Advisor to Ministry of Foreign Affairs of Thailand, at the SOM 3 Business Mobility Group Meeting on August 13, 2014

4.10 Border entry issues

Industry stakeholders noted a number of concerns regarding at-the-border complications such as inconsistent treatment of cardholders by border control staff.

These include:

- The need for better signage at airports to clearly indicate the ABTC fast track lane.
- Training for border control staff about the ABTC scheme and its uses (especially for economies receiving new US and Canadian cardholders, who may use the APEC priority lanes but do not have any economies listed on the backs of their ABTCs).
- Client issues with some economies marking pre-clearance visas to end prior to the expiration of the ABTC.
- Requests for ABTC member economies to standardize their requirements for fast track lane access. For example, some economies permit cardholders to use the card for leisure and/or bring family, junior staff, or clients with them through the priority lane, while other economies do not allow such actions.

4.11 Opportunities for redress or clarification on pre-clearance decisions

Officials from Papua New Guinea and the United States expressed their view that, in situations where a pre-clearance request is declined, the economy granting pre-clearance should inform the declined applicant's economy as to why the application has been declined. Officials noted that this could be done through the ABTC System.

In addition, officials from the United States have noted that it may be valuable for economies to consider possible redress mechanisms for situations when an application for pre-clearance is denied and the home economy wishes to further pursue the issue.

5 Recommendations for ABTC scheme enhancement

The goal of these recommendations is to identify potential best practices and areas for improvement, based on issues raised in Chapter 4, which will lead to a more efficient ABTC scheme, with corresponding benefits for clients, which more broadly benefits trade facilitation in the Asia-Pacific region.

The recommendations that follow are organized into three types: process, technology, and organizational, based on the aspect of the ABTC scheme that they impact. The recommendations are based on a variety of sources, including:

- More than fifty interviews with economy officials, industry stakeholders, and technical experts.
- Over 150 responses to two surveys conducted among economy officials and cardholders.
- Feedback from BMG members at the BMG Plenary meeting and ABTC workshop at SOM 3 in August 2014.

5.1 Process recommendations

5.1.1 Extension of ABTC card validity from 3 to 5 years

As discussed in section 4.1, the extension of the ABTC's validity period from 3 to 5 years is anticipated to improve client experiences by reducing the frequency with which clients must apply for new cards, while will similarly benefit economies by reducing staff time spent on applications and reducing printing costs.

Recommendation 1: Extend the ABTC's validity period from 3 to 5 years

The end-to-end review affirms the value of extending the ABTC's validity period, and strongly encourages the BMG to continue to move forward on the proposal, based on strong support from clients and general agreement from economy ABTC staff. This change would be expected to affect only cards issued after full implementation, and would therefore not affect existing cards at the time of implementation.

1. Extension of ABTC validity from 3 to 5 years	
Actions	BMG members implement necessary internal legislation to extend card validity and inform stakeholders; amend the ABTC Operating Framework to extend the validity date to 5 years within the document.
Start	August 2014
Complete	- August 2015 (basic legislation); August 2016 (full implementation)
Benefits	- Improved client experience - Reduced pressure on ABTC staff - Lower costs from fewer cards printed

Next steps:

- 1) ABTC participating economies to amend the ABTC Operating Framework to extend the validity date to 5 years within the document, and implement basic "nuts and bolts" legislation for the extension intersessionally by August 2015.
- 2) ABTC participating economies to fully implement the extension by August 2016.

5.1.2 Passport change policies

Currently the passport change notification process in the ABTC core system is somewhat time-consuming for processing staff. As noted in section 4.2, the Australian Department of Immigration and Border Protection (DIBP) has developed a cost estimate for implementing passport changes to the core ABTC system to streamline passport change approvals, and economies are now discussing the concept note.

In addition, several industry respondents have emphasize that they have a strong interest in the ABTC staying valid even if the client has to change passports.

Recommendation 1: Implement passport changes to core ABTC system

The end-to-end review encourages the BMG to move forward on the proposed changes to the ABTC core system in tandem with the extension of card validity from 3 to 5 years.

1. Implement passport changes to core ABTC system	
Actions	Streamline processes for passport change approval
Start	May 2015 (SOM 2)
Complete	August 2016 (full implementation)
Benefits	- Improved client experience - Reduced pressure on ABTC staff - Lower costs from fewer cards printed

Next steps:

- 1) ABTC participating economies to review proposed costs and benefits by the SOM 2 conference in May 2015.
- 2) Australian DIBP works to implement technical solution.
- 3) Changes finalized prior to extension of card validity from 3 to 5 years.

Recommendation 2: Standardize policies on passport changes among economies

BMG members are encouraged to adopt a unified policy to issue a replacement ABTC after passport changes without requiring an applicant to re-apply for a new ABTC. Most economies already follow this process, but feedback indicates this is an aggravating issue for clients in some economies.

2. Standardize passport change policies	
Actions	Determine whether economies can set a uniform policy to allow passport changes without re-application for an ABTC
Start	January 2015 (discuss at SOM 1 2015)
Complete	January 2016 (full implementation)
Benefits	- Improved client experience - Reduced pressure on ABTC staff to pre-clear additional applications

Next steps:

- 1) ABTC participating economies review policies and discuss whether there is value in adopting a uniform passport change policy.
- 2) If there is agreement, then economies set deadline for change as necessary.

Issue for consideration: Removing the passport number
One "hot topic" was whether it would be feasible to completely remove the passport number from the back of the ABTC. However, several stakeholders noted that many economies remain dependent on the passport number for a visual confirmation of client status at the border. The review therefore does not recommend removing passport information from the card at this time, but suggests this would be an additional benefit to adopting a "card-less" ABTC scheme as recommended in section 5.2.2.

5.1.3 Improving the pre-clearance process

The recommendations below seek to streamline and speed up the pre-clearance process.

Recommendation 1: Implement “preferred pre-clearance”

Offering clients the option to choose their “preferred pre-clearances” by selecting only the key destination economies they specifically wish pre-clearance from. Thus only the pre-selected economies would receive pre-clearance requests, and the client would be issued a final card with only those economies listed as valid for travel, reducing the burden on economy processing staff (particularly for economies that process many pre-clearances but receive comparatively few visitors).

1. “Preferred pre-clearance”	
Actions	Implement an alternative to standard pre-clearance process
Start	January 2015 (discussion)
Complete	November 2018 (implementation)
Benefits	- Improved client awareness and flexibility; - Reduces burdens on economies

To support their selection of economies, clients could be provided with more detailed information online about expected wait times for pre-clearances and the current step of the process flow for their application, giving clients a stronger sense of agency and better preparing their expectations for when they may receive the final card based on their economy selections. Such an approach should include the option for clients to later apply for additional economies if desired.

BMG members stated that the benefits of this proposal, initially proposed by ABTC operating staff, outweigh the challenges, but that it would require high level political consideration, especially insofar as providing the option to select a limited number of economies may be viewed as running counter to the APEC spirit of inclusivity.

Figure 12: Hypothetical model for preferred pre-clearance



Next steps:

- 1) Gather additional data to quantify the benefits of the current ABTC scheme to economies (For example, how many pre-clearances lead to visits and trade. Please see recommendation 5.2.5 for more on this idea).
- 2) Discuss feasibility of implementation and whether the proposal warrants high level political consideration and amendment of the ABTC Operating Framework.
- 3) Implement technical requirements for effective implementation, such as

- improved access to information about application status for clients.
- 4) Implement proposal across ABTC participating economies.

Recommendation 2: Improve ABTC staff communications

Economies should move quickly to update their email and phone contact lists for use by other economies' ABTC staff, and the BMG should consider mutual guidance for response times to queries about pre-clearances from other ABTC offices.

These simple measures could speed cross-economy communications and thereby reduce delays in pre-clearance approvals.

Next steps:

- 1) Economies update their phone and email contacts, and set regular times or events to update them in the future.
- 2) BMG members discuss at a future SOM meeting the appropriate metrics to set for response times to requests for information about pre-clearance requests or other ABTC issues.

2. Improved communications	
Actions	Update email contact lists and agree on response times for queries
Start	January 2015 (SOM 1)
Complete	- January 2015 (update contact lists, discuss response times) - August 2015 (implementation of response time guidance/agreements)
Benefits	- Improved communications, leading to faster responses on requests for additional information

5.1.4 Easing the process of ABTC renewals

The end-to-end review recommends that economies work to simplify ABTC re-applications and provide advance notice to clients ahead of the expiration of their cards to support client convenience and avoid a lapse in cardholder status for clients.

Recommendation 1: Advance notice of card expiration

Economies such as Indonesia and Peru currently advise clients 3 – 6 months in advance of the expiration date of their ABTC cards, either directly or through an authorized industry organization.

This review recommends that economies which have not yet implemented advance notice consider whether it will be feasible to implement (on an individual economy basis) advance notice via mail or email, so that clients can start the application process sooner and avoid a lapse in cardholder status. To realize the full advantages of this step, clients should be encouraged to submit applications before their current ABTCs expire.

1. Advance notice of card expiration	
Actions	Alert clients 3 – 6 months in advance of the expiration of their ABTC
Start	January 2015 (SOM 1)
Complete	August 2015 (SOM 3)
Benefits	- Improved stakeholder knowledge/engagement, - Helps to avoid lapse in cardholder status for clients

If this practice becomes widespread among ABTC participating economies, then a future improvement to the ABTC core system might include an alert or automatic update to clients six months prior to card expiration.

Next steps:

- 1) Economy ABTC staff members evaluate internal resources and client needs. Possible actions might include meeting with industry stakeholders to discuss whether local businesses perceive this service to be valuable.
- 2) Economies take necessary steps to implement update.

Issue for consideration: Saving client data for online renewals
A frequent complaint from clients is that there is no "institutional memory" of past applications: A first-time applicant for an ABTC is treated the same as somebody applying for their fourth card. While there are valid security reasons for this, it also runs counter to common expectations from many clients that view themselves as low risk business leaders.
Economies with online lodgement could save previously submitted information and allow applicants to simply confirm that their previously submitted information has not changed, which could help reduce applicant frustration with the re-application process.

Issue for consideration: Temporary interim card for renewals
The APEC Business Advisory Council (ABAC) proposed at the SOM 3 BMG meetings in August 2014 that economies might provide a temporary interim card during the renewal process. During discussion of this proposal at the SOM 3 meetings, the general view expressed was that resources should instead be spent on improving the speed of the renewal process and providing early notice of imminent expiration of the card. ²¹ However, this solution may make sense in some economies, and would reduce the inconvenience to clients from the current renewal process.

Issue for consideration: Standard policies for disposal of interim cards
For reasons of security and the integrity of the card, BMG members should consider the development of a standardized process for disposal of interim cards after they are superseded by the final cards. Instructions on proper disposal or return policies should be clearly provided to clients.

5.1.5 Provide additional guidance and training to at-the-border officials

Some clients have reported inconsistent treatment amongst immigration officials at the border in various economies or even within the same economy. Particular issues include:

- Varying acceptance of client's business/family companion(s) in the fast track lane.
- Varying acceptance of clients traveling for leisure in fast track lane.
- Confusion over blank back of US and Canada ABTCs, causing some clients to be denied access to fast track lanes.

As of September 2014, Thailand is currently conducting a survey of APEC economies on their current policies regarding the topics above, which will support future decisions by BMG members regarding their policies on issues related to the APEC fast track lanes.

²¹ Report from breakout session groups at the SOM 3 Business Mobility Group Meeting on August 13, 2014

Recommendation 1: Provide online guide to border immigration staff

Given the above issues, an easily updateable online guide should be provided to immigration staff so that they can keep abreast of current standard practices and new developments.

1. Additional guidance for border officials	
Actions	Provide up-to-date online guide to border control officials with guidance for border policies
Start	January 2015 (SOM 1)
Complete	August 2016 (SOM 3)
Benefits	- Increased consistency in border policies; - Improved client service

Next steps:

- 1) Create draft guide to provide guidance to officers in order to ensure consistent processing of ABTC holders at ports of entry.
- 2) Localize guide for each economy.
- 3) Establish update process.

5.2 Technology recommendations**5.2.1 Online lodgement**

An online ABTC platform would minimize staff data entry time and provide ease of access for clients. Based on stakeholder feedback, most BMG members and industry stakeholders would eagerly embrace an online e-ABTC platform that allows easy transfer of data into the core ABTC system without manual re-entering of data (a current issue for the online platforms used by Singapore and China), and would view such a platform as a significant step forward in reducing staff time spent on processing applications.

Recommendation 1: Implement shared online lodgement platform

The end-to-end review recommends that economies work towards the implementation of a modular online lodgement platform that can be shared across multiple economies, which ideally should be developed as a single system which then provides online modules to participating economies.

1. Shared online lodgement platform	
Actions	Implement a shared online lodgement platform for client ABTC applications
Start	January 2015 (SOM 1)
Complete	2016 (pilot); 2019 (in general use)
Benefits	- Improved stakeholder convenience; - Reduced ABTC staff workload; - Increased homogeneity among economy processes

This shared platform could either be developed as a single back-end for online lodgement with separate modules for different economies, which would support economies with less capacity to develop separate systems, or alternatively through providing a web platform to host links to separate online lodgement systems developed by

individual economies, which would enable economies to adopt online lodgement at their own pace.²²

BMG feedback suggests that the ideal approach would be a shared platform with a single back-end and multiple modules for different economies, to support economies with less capacity for developing their platforms, and also to encourage more homogeneity among BMG member data requirements.

However, economies must first determine which data requirements will be necessary to collect as part of the platform, and will need to create a roadmap and cost estimates. Below is a sample roadmap that was developed based on stakeholder feedback, which suggested that while some economies could potentially participate in a shared platform in the next 1-3 years, others would require significantly more time to build up their capacity to participate. As a result, the research team recommends that BMG members explore the potential for developing a pilot project to establish a shared platform among a limited number of supportive economies. By focusing on a smaller contingent of economies, the initial logistical challenges (such as hosting information and agreeing on common data requirements) will not be as challenging to overcome, and it will be easier to support other economies as they join the shared platform.

Figure 13: Sample Online Lodgement Roadmap



Next steps:

- 1) Develop a roadmap and cost estimates for a modular, shared online lodgement platform across multiple economies.
- 2) Create a pilot program to demonstrate feasibility and overcome potential challenges.

5.2.2 Card-less ABTC scheme

In the long term, a card-less ABTC scheme may be the best future evolution of the card to ensure that the ABTC scheme retains its relevancy in a world where technology for travel facilitation is rapidly evolving towards new solutions that are more secure and more convenient for travelers, such as biometric passports, e-visas, automated border processing systems (such as the SmartGates being introduced by the Australian Customs and Border Protection Service and the New Zealand Customs Service), and other technologies.

Adopting the technology to include a traveler's ABTC-related information as part of the information stored on an e-passport would eliminate the inconvenience for clients of waiting for a new card to arrive in the mail, as well as the need to replace cards when

²² Presentation by Dr. Pratit Santiprabhob – Associate Professor of Computer Science at Assumption University, Advisor to Ministry of Foreign Affairs of Thailand, at the SOM 3 Business Mobility Group Meeting on August 13, 2014

passports expire, and would eliminate the need for clients to carry additional travel documents aside from their passport and visa. For ABTC offices, eliminating the need to print physical ABTCs has the potential to reduce the strains on the processing base for the card that are being created by its growing popularity, and would also preserve the integrity of the card by making it more difficult to counterfeit.

Recommendation 1: Further explore the implementation of a card-less ABTC scheme

The end-to-end review recommends that economies perform a detailed technical and cost evaluation to assess the necessary capacity for adoption of a card-less ABTC scheme.

However, it should be recognized that for many economies this is an “aspirational” technology for the foreseeable future, and it will take significant time and effort to work towards the point when a card-less ABTC scheme can be widely implemented.

1. Card-less ABTC scheme	
Actions	Perform a technical and cost evaluation to assess the necessary capacity for adoption of a card-less ABTC; discuss ways to overcome the drawbacks and challenges; and set time frames for possible phased implementation
Start	January 2015 (SOM 1)
Complete	2016 (pilot); 2019 (target for implementation across economies)
Benefits	- Improved client convenience; - Eliminates the need for printing; - Increased security

Figure 14: Advantages and remaining issues of a card-less ABTC scheme

Advantages	Issues to be worked out
<ul style="list-style-type: none"> • Cardholder convenience 	<ul style="list-style-type: none"> • Cost
<ul style="list-style-type: none"> • Faster lane processing 	<ul style="list-style-type: none"> • Priority lane sorting
<ul style="list-style-type: none"> • No lost or stolen cards 	<ul style="list-style-type: none"> • Technology and platform compatibility
<ul style="list-style-type: none"> • Potential for increased security 	<ul style="list-style-type: none"> • Trust in shared systems
<ul style="list-style-type: none"> • No need to print cards 	

To begin, BMG will need to perform a technical evaluation to assess the necessary capacity among BMG members for adoption of a card-less ABTC scheme, and assess the best technical options available. BMG members will also need to agree on a common standard for data collection and compatibility as well as a timeline for adoption, based on when it would be financially feasible to move towards this capability. In order to achieve a card-less ABTC scheme, BMG members will need to adopt e-passports with unified standards, as well as new ways to easily keep clients updated about their current status (such as their card validity period and the economies which have granted them pre-clearance). This latter issue could for example be addressed by making part of the chip data readable by the client’s smartphone with an NFC (near-field communications) reader, such as is currently possible with e-passports.²³

Given the significant hurdles ahead, it may be advisable to explore a phased development of this capability begun by the advanced economies that have already implemented necessary technologies such as widely used biometric passports. These economies can assess the feasibility of a card-less model while anticipating that they will need to continue to use the physical ABTC for several years to come while other economies catch up.

²³ Gemalto. “The fourth generation of ePassport.” June 2014 Pg. 7 URL: http://www.securitydocumentworld.com/creo_files/upload/article-files/gp_white_paper_ids2.pdf

Next steps:

- 1) Perform technical evaluation to assess the necessary capacity for adoption of a card-less ABTC scheme.
- 2) Discuss time frames for overcoming challenges to achieve a card-less ABTC scheme.
- 3) Explore a phased approach to implementation within a set time frame (5-10 years) such as through a pilot program by an initial set of economies.

5.2.3 Biometric ABTC

Machine-readable cards could improve security and the integrity of the card by confirming a client's identity with biometric information, while also eliminating the inconvenience of replacing a card whenever a client changes passports. This could also reduce printing costs (though each card will cost more).

Recommendation 1: Define parameters for a biometric-enhanced ABTC

Stakeholder feedback indicates that there are significant legal, policy, and technical hurdles to implementing a biometric ABTC.

While the technical hurdles are less significant than those faced by the card-less ABTC concept, a number of economies have expressed significant concern that the collection of biometric information would require a high investment in capabilities that currently don't exist (or are only in major cities), and in several cases would face legal and/or policy restrictions on the types of data that can be collected, stored, or shared with other economies. In addition, the need for clients to travel in-person to have their biometric data (such as fingerprints) captured would be inconvenient and possibly expensive for clients, and would also inhibit efforts to move the application towards eventual online lodgement.

1. Biometric ABTC card	
Actions	Compare benefits with the card-less ABTC concept; perform a technical and cost evaluation; discuss ways to overcome the drawbacks and challenges; and set time frames for possible phased implementation
Start	January 2015 (SOM 1)
Complete	<i>If pursued</i> , then: 2017 (complete planning); 2021 (complete trial and begin implementation)
Benefits	- Improved client convenience; - Increased security

Given these challenges, the research team recommends that economies keep the biometric card in mind as a potential alternative to the card-less approach, but suggests that the potential legal, policy, and convenience hurdles are significant enough that a biometric card may not be the best investment at this time.

Next steps:

1. Compare benefits with the card-less ABTC concept and determine if a biometric card's benefits outweigh those of a card-less approach; if so then perform a technical and cost evaluation to assess the necessary capacity for adoption of a biometric ABTC (similar to processes recommended for a card-less approach).

5.2.4 Core ABTC platform improvements and review

Processing staff from every economy interviewed raised valuable suggestions for improving the core ABTC system, which could make the system more efficient and user-friendly for staff.

Recommendation 1: Implement changes to ABTC core system to increase efficiency and provide incremental improvements to ABTC processing

Listed below are a number of suggested changes to the core ABTC system which have been raised by ABTC processing staff from several different economies.

Two issues in particular were mentioned by processing staff. First, the process to grant approval for foreign pre-clearance requests requires a number of steps to accomplish, and some economies have requested consideration of whether batch uploads of pre-clearance results into the ABTC system would be possible.

1. ABTC system changes	
Actions	Perform a technical and cost evaluation to assess which changes are feasible, and implement changes either in a step-by-step approach or as part of a general review and upgrade of the core system
Start	January 2015 (SOM 1)
Complete	2016
Benefits	- Reduced errors by operators; - Improved user friendliness and efficiency for operators

Second, correcting minor data entry mistakes after an application request has been submitted can be a tedious and manual process for ABTC processing staff, since applications can only undergo limited changes after they have been submitted for pre-clearance by other APEC economies. Often this means that processing staff must instead create a duplicate application and delete the old application in order to correct the issue with the original application. As a result, processing staff have questioned whether validation checks on points such as correct data format or passport validity could be included in the batch excel/csv file used by all economies, so as to mitigate the number of data entry mistakes, and avoid duplicate applications with new passport validity when the previous application is still being processed.

Table 1: Possible improvements to the core ABTC system

#	Suggestions	Benefit
1	Permit economies to edit an application after it has been uploaded, but before other economies have approved it; or to change a faulty element and notify other economies after some pre-approvals have been given.	This would reduce staff time spent on creating duplicate applications to replace faulty applications that cannot be edited by the home economy.
2	Fix client eligibility for travel at the listed card duration (3 years, etc.) for all economies. Currently, some economies give a shorter approval time for a client's eligibility than the listed card duration, when it's not possible for the client to see this.	This would prevent situations when clients face unexpected visa issues upon arrival at their destination economy.
3	Provide functionality for economies to add checklists for internal usage. For example, Australian ABTC staff use an external Word document checklist for checking domestic applicants, which could be partially auto-filled or checked if the checklist was already part of the system.	This would reduce redundant data entry for some economies and also cut down on the number of programs that are actively used by processing staff.
4	Standardize the formats for entering applicants' given names and surnames into the ABTC system, as well as clearly labeling dates by DD/MM/YY.	This could help to reduce data entry errors (such as accidental mistakes in date entries by economies that follow the MM/DD/YY format) and could reduce follow-up requests for additional information.
5	Pre-populate a re-application for the card with biographic information, which could eliminate manual re-entry of data for renewals.	This could reduce staff time spent on data entry into the ABTC system. It could also be built into a possible future online lodgement system.
6	Pre-populate the "date of entry" for a pre-clearance request when it is entered into the system, so that economy staff don't accidentally enter other dates (such as the date that the applicant submitted their information to the home economy).	This would reduce user error.
7	Enable economies to send application related emails to a client through a module on the core system rather than a separate system.	This would reduce the number of systems that operators work with and could help prevent human error.
8	Accommodate more customization/modification of the access controls for the ABTC core system, such as separating permissions for systems access so that managers can grant different levels of access within the system.	This could support economies with a large staff or with many different actors (multiple ministries, industry organization support) who could potentially use the ABTC system.
9	Enable automatic notification when a domestic candidate has been cleared by all 19 economies so that staff do not need to check daily for the status of individual applicants.	This issue was raised by business associations in some economies, and could save staff time as well as ensure that applicants receive ABTCs as soon as possible.
10	Set the CSV file generated by the ABTC system to provide an alert if the applicant's passport validity is too short for the ABTC card to be granted.	This would prevent staff from needing to check an application that can't be granted at the time.
11	For clarity, consider changing the terminology used in the system for passport changes from Approve and Cancel to Approve and Reject, and consider adding a third option, Pending, so that an economy can indicate that it is considering the information and has not yet made a decision.	These changes could help reduce user confusion and provide more detailed information within the system about current progress for an application.
12	Consider whether batch uploads of pre-clearance results into the ABTC system would be possible for all economies.	This would help prevent user error in data entry and would speed up the process to grant approval for foreign pre-clearance requests.

Next steps:

1. Discuss among BMG members which of the above items (or additional items not discussed here) are significant issues that should be addressed, and determine the priority of possible changes to be implemented to the system

Recommendation 2: Consider a technical review of the ABTC system

Given the large number of technical changes suggested by stakeholders, there is likely to be value in conducting a review of the current core ABTC system to determine the best way forward, such as whether it is better to implement multiple minor upgrades or consider whether an alternate platform might be the better pathway forward. This review could take several forms: an informal review conducted internally or by a trusted peer, or a more formal review by a trusted third party, to examine the suitability of the current system and suggest recommended alterations to the system.

1. ABTC core system review	
Actions	Perform a technical review of the ABTC core system to implement significant changes and prepare for possible future modifications
Start	January 2015 (SOM 1)
Complete	2016
Benefits	- Reduced errors by operators; - Improved user friendliness and efficiency for operators

It is important to consider that this action would not occur in a vacuum. Rather, any evaluation of the core system would need to consider the future technologies and policies that it may need to support, possibly including online lodgement, biometric information, etc.

Next steps:

1. Consider among BMG members whether the scope of beneficial changes to the ABTC merits a broader review of the ABTC, and what level of review might be necessary.

5.2.5 Tracking metrics for ABTC usage and trade and investment flows

Given that one of the goals of the ABTC scheme is to encourage regional trade and investment across APEC economies, it would be beneficial for economies to be able to track and share information about the use of the ABTC and how usage has affected business travel and trade and investment flows over time. This could be done through setting metrics to track, such as the number of cardholders entering and exiting an economy, and regularly comparing those metrics against trade statistics provided through each economy's public agency responsible for international trade and commerce.

Recommendation 1: Implement software to track ABTC card usage across economies

Within the legal frameworks that each economy follows, economies should implement tools to accurately track ABTC usage and regularly compare that information with regional trade and investment data. This will help economies with planning and will help to develop a better understanding of the impact that the ABTC has on actual trade.

In addition to better understand how the card

1. Tracking ABTC usage and trade flows	
Actions	Determine any possible legal or policy barriers for data collection and sharing; set standards and install software; set up metrics to be tracked; regularly compare and analyze data
Start	January 2015 (SOM 1)
Complete	2017
Benefits	- Improved knowledge of ABTC usage; - Improved ability to quantify the benefits of the ABTC for regional trade

might be impacting regional trade, better information about the card's impact on regional trade will aid planning by ABTC staff, and will support efforts to quantify the benefits of the card to economies, which in turn will help to inform the appropriate budget and staff requirements for the ABTC.

Next steps:

1. Determine whether there are any legal or policy issues that economies would face in collecting (and possibly sharing) data on ABTC usage.
2. Set standards for data collection among economies and install any software that would be necessary for border agencies to track this information.
3. Establish cooperation between border agencies, ABTC operator staff, and economy's public agency responsible for international trade and commerce.
4. Set up metrics that can be tracked in a regular fashion (for example, the number of ABTC cardholders that enter and/or exit an economy).
5. Once the pool of regular data is deep enough, experts can compare the metrics collected with other data to better ascertain the impact of the ABTC on regional trade and investment.

5.3 Organizational recommendations

5.3.1 Technical support group

Currently the BMG is considering a proposal from Australia's DIBP to implement a "capacity building group" to help develop multilateral capacity building among ABTC processing staff and support future recommendations for best practices.

In the long-term, the goal of such a project would be to create ways for different member economies to provide more assistance across APEC for smaller economies as part of the scheme, such as through training programs and similar exercises.

Recommendation 1: Create a technical support group for capacity building

In order to support the development of shared expertise and knowledge, BMG members should implement a "technical support group" to help develop multilateral capacity building among ABTC processing staff.

One potential model for capacity building may be bilateral training assistance between two economies, such as the cooperation between DIBP and Papua New Guinea's Immigration and Citizenship Service Authority (ICSA) that was discussed in the capacity building section in Chapter 4.

1. Technical support group	
Actions	Determine funding available and best mechanisms for technical support group; establish regular framework for support; provide opportunities for regular feedback or recommendations for best practices
Start	January 2015 (SOM 1)
Complete	Ongoing
Benefits	- Supports progress of ABTC program across APEC economies; - Builds trust and technical knowledge for BMG

Other models might include regular workshops for ABTC staff on the sidelines of a technical conference on border control measures,²⁴ or a series of online training videos, available in multiple languages, which would provide specific best practices and processes for ABTC staff to learn from.

This support group could also make future recommendations for best practices. Individual economies might need to tweak these practices according to their own circumstances, but such recommendations could serve as benchmarks that each economy can work towards. In addition, such recommendations could help to build a shared understanding of how the ABTC system is operated across different economies, and would help to maintain and hopefully increase trust among economies as well.

The creation of a regular mechanism for technical support among economies could also be greatly beneficial if the BMG explores a phased approach to the technical issues raised in the previous section such as online lodgement.

5.3.2 Client contact center

An ABTC client contact center could enhance client experiences by providing reliable support for various issues, and would reduce the burden on ABTC staff. In particular, if a shared online lodgement system were implemented by BMG members, it would be wise to also implement a client contact center specifically for online services.

While this suggestion has been raised across multiple interviews with industry stakeholders, there are two broad roles that a contact center might fill:

- 1) Support for application procedures and current status.
- 2) Support for clients' at-the-border issues.

Recommendation 1: Explore whether a client support center would provide significant client benefits

In order to support the development of shared expertise and knowledge, BMG members should consider the possible costs and benefits that would come from implementation of a client contact center.

Possible benefits would include support for client applications by trained staff, which could potentially relieve pressure on the ABTC operating staff for most economies. Support for at-the-border issues could help clients navigate difficult and unexpected visa situations.

Since this idea has not yet been closely considered by BMG members, it is recommended that the issue should be considered intersessionally and then discussed at a future meeting. Considerations would include the scope of responsibilities for such a call center (for example, due to possible language issues, it has been suggested by

1. Client contact center	
Actions	Determine economy views on possible implementation of a contact center, and consider possible avenues for implementation and funding
Start	January 2015 (SOM 1)
Complete	2016 (established)
Benefits	- Improved client convenience

²⁴ For example, a potential conference could be the annual Border Management Conference organized by the International Organization for Migration (IOM) and the Asia-Pacific Smart Card Association (APSCA)

some economies that at-the-border issues might be best handled by a switchboard system to connect clients with their home economies), as well as possible funding methods.

Next steps:

- 1) Economies could consider individually their views on a contact center and whether their citizens would receive significant benefits from either of the proposed roles that such a center could provide.
- 2) Discuss among BMG members their views and possible next steps, such as developing a funding mechanism.

6 Appendix

6.1 Research activities

The research team conducted research through phone and in-person interviews, literature research, and data collection through surveys of clients and government operators. In addition, the research team conducted a workshop as a part of the August 2014 SOM 3 APEC conference in Beijing, China, in which representatives for the ABTC staff from BMG member economies participated in a series of breakout group discussions on possible future directions for the ABTC scheme.

Interviews

In addition to literature research, 25 phone interviews and 26 in-person interviews were conducted across the 10 case study economies for this research project: Australia, China, Papua New Guinea, Peru, Malaysia, New Zealand, Japan, Indonesia, Singapore, and the United States. Research team members visited most of these economies for in-person interviews.

Research Travel

The research team has conducted five research trips in total:

Table 2: Travel schedule

Date	Economies visited
May 09 – 20	Australia, Malaysia, Singapore, Thailand
June 03 – 06	Indonesia, New Zealand
June 14 – 21	China, Japan
June 18 – 21	Peru
August 10 – 13	China (SOM 3 conference in Beijing)

The research team spoke with both government and industry stakeholders from the case study economies. In particular, in-person meetings were invaluable opportunities to discuss at length on various aspects of the ABTC process, and in many cases to witness first-hand the operation of ABTC processes by government staff, such as checking domestic applications, approving pre-clearance requests, printing cards, and other tasks.

Interviews with government stakeholders included discussions with staff members that set business mobility policies, the operational staff responsible for printing cards and reviewing domestic applications and foreign pre-clearance requests, staff from border entry agencies, and technical advisors to the government.

Interviews with industry stakeholders included trade organizations that represent large numbers of cardholders or play an important role in issuing support letters for applicants, long-term and recent cardholders, ABAC members, and staff from large firms that contain hundreds of cardholders.

In addition, interviews were conducted with technical experts on biometric technology and smart cards.

Surveys

Two online surveys were conducted among clients and government staff.

The first of these surveys was given to ABTC processing authorities in each economy in order to solicit operator views on a variety of processing, technical, and organizational issues with relevance to the ABTC program.

The second survey was shared with current and former cardholders in order to gauge client satisfaction with the scheme, especially from clients from economies that were not citizens of the case study economies. The client survey received 140 responses from across the APEC region.

Workshop

On August 13, 2014, the research team led a workshop for the BMG at the SOM 3 conference in Beijing, China. Following presentations by the research team and a technical expert, participants from APEC economies were divided into breakout groups to discuss the topics below. The feedback from those discussions has contributed to the recommendations made in this publication.

Table 3: Workshop topics for discussion

#	Topic
1	Creation of an online lodgement platform (whether shared or developed separately)
2	Allow applicants to pre-select economies for pre-clearance
3	Implement a biometric-capable ABTC (chip or magnetic strip enhanced card)
4	Create a shared client service center or hotline for clients to contact about issues with applications or at-the-border issues
5	Implement a card-less ABTC
6	Allow all economies to provide pre-clearance for permanent residents
7	Provide a temporary interim card for clients to use while waiting for card renewals

6.2 Interviews conducted

The following 51 phone and in-person interviews were conducted with stakeholders from 11 case study economies over a period from March 2014 through August 2014.

Table 4: Completed discussions

Economy	Stakeholder	Participants	Date (EDT)
Australia	Government	Australia Department of Immigration and Border Protection (Policy staff)	3/20/14
			4/3/14
			5/12/14
		Australia Department of Immigration and Border Protection (Processing staff)	5/13/14
	Industry	Australian Chamber of Commerce and Industry	4/28/14
			5/12/14
China	Government	Consular Department, Ministry of Foreign Affairs	4/8/14
			6/17/14
		Ministry of Public Security (MPS)	6/17/14

	Industry	China Council for the Promotion of International Trade (CCPIT)	6/16/14
		Huawei Corporation	6/16/14
	Expert	Professor, Intelligent Vision Group, Tsinghua University	6/16/14
Indonesia	Government	Directorate General of Immigration, Ministry of Law and Human Rights	4/22/14 6/04/14
		Industry	KADIN Indonesia
	Japan	Government	APEC Division, Economic Bureau, Ministry of Foreign Affairs
Industry			Council for ABAC Japan (SCABAC-J)
Expert		Athena Smartcard Solutions	5/19/14
Malaysia	Government	Ministry of Home Affairs, Immigration Affairs Division	4/8/14 5/19/14
	Industry	Federation of Malaysian Manufacturers (ABAC Malaysia Secretariat)	4/22/14
		Malaysia International Chamber of Commerce & Industry (MICCI)	5/16/14
		ABAC Malaysia Secretariat; Malaysia Ministry of International Trade & Industry; Malaysia Investment Development Authority	5/19/14
New Zealand	Government	Immigration New Zealand, Ministry of Business, Innovation, and Employment	4/2/14
		Immigration New Zealand, Ministry of Business, Innovation, and Employment	4/10/14
		Immigration New Zealand, Ministry of Business, Innovation, and Employment	6/06/14
	Industry	NZ International Business Forum (ABAC New Zealand)	4/28/14 6/06/14
Papua New Guinea	Government	Immigration and Citizenship Authority, Visa and Passports Division	4/9/14
Peru	Government	Executive Secretariat for Peru for the ABTC Program	4/30/14 6/20/13
	Industry	COMEXPERU (ABAC Peru)	4/21/14 6/19/14
		Government	Immigration & Checkpoints Authority, Policy Administration & International Affairs Division
Singapore	Industry	Singapore Business Federation (ABAC Secretariat)	4/24/14 5/15/14
		Pacific International Lines (Cardholder)	4/30/14
	Government	Department of Consular Affairs, Ministry of Foreign Affairs	4/20/14 5/19/14
Thailand	Industry	Thai Bankers' Association	4/23/14
		Thai Bankers' Association; Joint Standing Committee on Commerce, Industry and Banking – Thailand (JSCCIB)	5/16/13
	Expert	ABTC technical advisor to Thailand Department of Consular Affairs, Ministry of Foreign Affairs	4/10/14 5/16/14
US	Government	US Customs and Border Protection and US Department of State	5/13/14
	Industry	National Center for APEC	7/18/14
	Expert	Global Business Travel Association	4/24/14
Other	APEC	APEC Secretariat	5/14/14
	Industry	Mr. Tony Basilio, Director, ABAC	4/29/14