# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0200** (JIRA: UCCNCTS-3064) |
| **Related Incident ID** | **IM552934 / PM24950 / KE22892** |
| **RFC Initiator / Organization** | **NA-IE** |
| **CI** | **NCTS-P5 (DDNTA-5.15.0-v1.0.0 - CSE-v51.8.0)** |
| **Type of Change** | **Standard**  **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | |  | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes  No** |

***Change Summary***

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| **NCTS-P5 (DDNTA-5.15.0-v1.00 - CSE-v51.8.0): Correction of CTS-5.7.1, to avoid a possible violation of C135, C140, R876, TR9120 when downgrading some messages CD001C, CD003C, CD012C, CD038C, CD050C or CD115C.** |
| Based on G0062, Goods Item(s) can be taken out during control. Consequently, what is valid in CD001C (and similar messages) can be – after downgrade – violating various constraints existing in NCTS-P4 (but not in NCTS-P5): if all values are the same, it must be placed at HEADER level, not at GOODS ITEM level [R876 on ‘Commercial Reference Number’ / C135 on ‘Country of dispatch/export code’ / C140 on ‘Country of destination code’ / TR9120 on ‘Transport charges/ Method of Payment’]. |

**Section 2: Problem statement**

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| In **DDNTA-5.15.0-v1.0.0** (based on CSE-v51.8.0), the R0506 and R0507 are attached on a number of data elements in CC015C & CC013C.  The purpose of these Rules is to avoid that the **same** **value** is included for **all** ‘House Consignment’ iterations (R0506) or for **all** ‘Consignment Item’ iterations (R0507 and B1877).  Wording of **R0506** in DDNTA-5.15.0-v1.00:    Wording of **R0507** in DDNTA-5.15.0-v1.00:    Wording of **B1877** in DDNTA-5.15.0-v1.00:    The rules R0506 & R0507 are not applied to Common Domain messages, because during the control, one or multiple ‘Consignment Item(s)’ may be removed from the declaration. This justifies the existence of the Guideline G0062 applied in CD001C/CD003C/CD012C/CD038C/CD050C/CD115C and CC029C with the following wording in DDNTA-5.15.0-v1.00:    The issue identified is that this logic applied in NCTS-P5 is not present in NCTS-P4.  In DDNTA-v20.00, there is no difference between CC015B and the Common Domain Messages: in NCTS-P4, CD001B follows a stricter approach similar to CC015C regarding rules and conditions that force some data elements to be declared on HEADER level, if they are common for all ‘Consignment Item’ iterations (e.g. R876).  Consequently, during the DOWNGRADE conversion of some messages CD001C, CD003C, CD012C, CD038C, CD050C or CD115C the following NCTS-P4 rules & conditions might be violated:   * **R876** attached on ‘**Commercial Reference Number’** data item * **C135** attached on ‘**Country of dispatch/export code’** data item * **C140** attached on ‘**Country** **of destination code’** data item * **TR9120** attached on ‘**Transport charges/ Method of Payment’** data item   Wording of **R876** in DDNTA-20.00:    Wording of **C135** in DDNTA-20.00:    Wording of **C140** in DDNTA-20.00:    Wording of **TR9120** in DDNTA-20.00:    Conclusion: those exceptions when downgrading should be avoided by adapting the CTS package. |

**Section 3: Description of proposed solution**

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| The **Conversion Technical Specifications** for NCTS-P5 (CTS-5.7.1-v1.00) is changed by introducing a new function to ensure that the **Downgrade** of the abovementioned Data Items shall not generate a violation of R876, C135, C140.  Logic that shall be applied in the CTS:   * “**Reference number UCR**”: when this data item is declared at ‘Consignment.House Consignment.**Consignment Item**’ level and if the value of this data item is the same for **all** iterations of ‘Consignment.House Consignment.**Consignment Item**’ or only a **single** ‘Consignment.House Consignment.**Consignment Item**’ exists then it will be mapped with the respective NCTS-P4 “**Header**.Commercial Reference Number” so that R876 will not be violated. * “**Country of dispatch**”: when this data item is declared at ‘Consignment.House Consignment. **Consignment Item**’ level and if the value of this data item is the same for **all** iterations of ‘Consignment.House Consignment.**Consignment Item**’ or only a **single** ‘Consignment.House Consignment.**Consignment Item**’ exists then the data item will be mapped with the respective NCTS-P4 “**Header**.Country of dispatch/export code” so that C135 will not be violated. * “**Country of destination**”: when this data item is declared at ‘Consignment.House Consignment.**Consignment Item**’ level and if the value of this data item is the same for **all** iterations of ‘Consignment.House Consignment.**Consignment Item**’ or only a **single** ‘Consignment.House Consignment.**Consignment Item**’ exists then the data item will be mapped with the respective NCTS-P4 “**Header**.Country of destination code” so that C140 will not be violated. * “**TRANSPORT CHARGES**”, when this data group is declared at ‘Consignment.House Consignment.**Consignment Item**’ level and if the value of this data group is the same for **all** iterations of ‘Consignment.House Consignment.**Consignment Item**’ or only a **single** ‘Consignment.House Consignment.**Consignment Item**’ exists then it will be mapped with the respective NCTS-P4 “HEADER. **Transport charges**/ Method of Payment” so that TR9120 will not be violated.   **IMPACT ASSESSMENT:**  This RFC-Proposal has an impact on business continuity, but the probability to observe the exception during the downgrade in operations is relatively low. To eliminate impact on the Common Domain, it must be applied by all NAs not using the ieCA, and it should be deployed as soon as possible.  **Proposed** date of applicability in Operations (**T-Ops**):   15.02.2023 (to be confirmed by DG TAXUD/B3)  **Proposed** date of applicability in CT (**T-CT**):                     15.02.2023 (to be confirmed)  **Expected** date of approval by ECCG (**T-CAB**):                  21.12.2022  **Risk in case of non-implementation:**  Some few movements could be blocked due to a rejection based on P4 constraints, with extra workload for the National Helpdesks.  **Impacted messages:**   * CD001C, CD003C, CD012C, CD038C, CD050C, CD115C   **Impacted CI Artefacts:**   * CSE-v51.8.0: No. * DDNTA-5.15.0-v1.00 (Appendix K): No. * Functional Specifications NCTS-P5 (FSS/BPM): 5.30.2: No. * DDCOM-20.4.0-v1.00: No. * DDNTA-5.15.0-v1.00 (Main Document): No. * DMP Package-v5.7.0-v1.00 (ONLY the file Rules and Conditions\_v0.45): No. * **CTS-5.7.1-v1.00: Yes.** * ACS Main Document: v5.8.0-v1.00 & ACS Annex for NCTS: 5.8.0-v1.00: No. * CTP-5.10.0-v1.00: No. * **TRP-5.11.1: No.** * **CRP-5.7.4-v1.00: Yes.** * ieCA 1.0.4.1: No. * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.50-v1.00: No. * CS/MIS2\_DATA: No. * CS/RD2\_DATA: No. * UCC IA/DA Annex B: No.   **NCTS-P6:** No impact [No downgrade to NCTS-P4] |

**Impact on CI artefacts**

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| **CTS-5.7.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Introducing a new mapping function, as defined in section 3 above.** | |
| **CRP-5.7.4-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Upgrade to load the corrected CTS.** | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Likely low impact for the NA not using the ieCA. The new CTS with XSLT function will be published.  No impact for the NAs using the ieCA for central conversion (if implemented in time in CRP & loaded in time in ieCA). | |

| **Document History** | | | |
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| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 06/12/2022 | *Draft by SOFTDEV* |
| v0.20 | Draft by SOFTDEV | 07/12/2022 | *Added D.G. “TRANSPORT CHARGES” in the affected cases.* |
| v0.30 | Updates by SOFTDEV | 13/12/2022 | *Implemented comments provided by DG TAXUD* |
| v1.00 | SfR to NPMs | 16/12/2022 | *For emergency review by NPMs* |
| v1.00a | SfR2 to NPMs | 20/12/2022 | *Dates of applicability modified. CRP release number corrected.* |
| v1.10 | SfA to NPM | 08/01/2023 | ***Considered as accepted following CAB on 21.12.2022.  No change applied compared to v1.00a except the target date for deployment of upgraded CRP in ieCA.*** |