# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0203** (JIRA: UCCNCTS-3099**)** |
| **Related Incident ID** | **IM549363+IM553470 / PM24943 / KE22884** |
| **RFC Initiator / Organization** | **NA-FR & NA-IE** |
| **CI** | **NCTS-P5 (DDNTA-5.15.0-v1.0.0 - CSE-v51.8.0)**  **NCTS-P6 (DDNTA-6.2.0-v1.00 – CSE-v60.4.0)** |
| **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-v1.0.0 - CSE-v51.8.0): Correction of the multiplicity of D.G. ‘INVALIDITY GUARANTEE REASON’ in CC055C (9x, aligned to CD205C).** |
| In the message CC055C, the multiplicity of the Data Group ’GUARANTEE REFERENCE.INVALIDITY GUARANTEE REASON TRANSPORT CHARGES’ shall be changed from 1x to 9x to enable the Office of Departure to forward (in IE055) all the information received from the Office of Guarantee (in IE205). The correction shall be applied in DDNTA for NCTS-P5 and in DDNTA for NCTS-P6. |

**Section 2: Problem statement**

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| In **DDNTA-5.15.0-v1.0.0** based on **CSE-v51.8.0**, the multiplicity of the Data Group ‘INVALID GUARANTEE REASON’ is not consistently defined in the messages CD205C and **~~CD055C~~ CC055C**.  The message CD205C is used to create the message **~~CD055C~~ CC055C**:  **CD205C - (C\_GUA\_USR) - GUARANTEE USE RESULT**  (…)  ---GUARANTEE 9x R  Sequence number R n..5 R0987  Guarantee type R an1 CL286  ------GUARANTEE REFERENCE 99x R  Sequence number R n..5 R0987  GRN R an..24 G0002  ---------CUSTOMS OFFICE OF GUARANTEE 1x D C0417  Reference number R an8 CL174 B1847  ---------VALIDITY LIMITATION 99x O  Sequence number R n..5 R0987  Guarantee not valid in R a2 CL146  ---------INVALID GUARANTEE REASON **9x** O  Sequence number R n..5 R0987  Code R an..3 CL252  **CC055C - (E\_GUA\_INV) - GUARANTEE NOT VALID**  (…)  ---GUARANTEE REFERENCE 99x R  Sequence number R n..5 R0987  GRN R an..24 G0002  **------INVALID GUARANTEE REASON 1x R**  Code R an..3 CL252  Text O an..512  The difference in the cardinalities of the DG "INVALID GUARANTEE REASON" in the IE205 and IE055 can be an issue. In the DDNTA-5.15.0-v1.00 **Main Document** the scenario "**III.II.2.9.2 T-TRA-DEP-A-013-Release for transit refused due to guarantee registration failure**", includes the following text:  *"[Step 5] The result of the guarantee check is not successful. Consequently, the Office of Guarantee sends a* ***negative ‘Guarantee Use Result’ C\_GUA\_USR (IE205)*** *back to the Office of Departure (i.e. with the data group ‘Invalidity Guarantee Reason’ present in the message).*  *[Step 6] The timer at the Office of Departure T\_Guarantee\_Awaiting\_Amendment starts.*  *The state of the movement at the Office of Departure is set to Guarantee under amendment.*  *[Step 7]* ***The Holder of the Transit Procedure is notified with the ‘Guarantee Not Valid’ E\_GUA\_INV (IE055) message since the declared guarantee is not valid.***  *After reception of the ‘Guarantee Not Valid’ E\_GUA\_INV (IE055) message, the Holder of the Transit Procedure needs to amend the invalid guarantee by sending the ‘Declaration Amendment’ E\_DEC\_AMD (IE013) message".*  The Office of Departure must be able to send **one** message (i.e. **not nine** messages) IE055 to the Holder of Transit Procedure upon reception of the IE205 that contains the DG "INVALID GUARANTEE REASON".  When the message IE205 is received with two or more ***‘Guarantee Not Valid’***, the Office of Departure should not be obliged to select which code to use in the IE055. All errors regarding the Guarantee (as received from GMS via the message IE205) should be reported to the Holder of the Transit Procedure with the message IE205.  This error in the CC055C should be corrected, to ensure **consistency of the structure** across all messages.  The same issue is also included in the **DDNTA-6.2.0-v1.0.0** based on **CSE-v60.4.0**, as illustrated hereafter: |

**Section 3: Description of proposed solution**

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| In **DDNTA-5.15.0-v1.0.0 (incl. Appendix Q2)** and the **CSE-v51.8.0**, the message CC055C shall be corrected to get the multiplicity of the Data Group ‘INVALIDITY GUARANTEE REASON’ corrected as illustrated below: (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  **CC055C - (E\_GUA\_INV) - GUARANTEE NOT VALID**  (…)  ---GUARANTEE REFERENCE 99x R  Sequence number R n..5 R0987  GRN R an..24 G0002  ------INVALID GUARANTEE REASON ~~1x~~ **9x** R  **Sequence number R n..5 R0987**  Code R an..3 CL252  Text O an..512  The **Appendix X** shall be corrected as follows:  **CC055C.xsd**  (…)  <xs:complexType name="CC055CType">  <xs:sequence>  <xs:group ref="MESSAGE" />  <xs:element name="TransitOperation" type="TransitOperationType59">  (…)  <xs:element name="GuaranteeReference" maxOccurs="99" type="GuaranteeReferenceType07">  <xs:annotation>  <xs:documentation>  <description value="GUARANTEE REFERENCE" />  <optionality value="R" />  </xs:documentation>  </xs:annotation>  </xs:element>  (…)  **ctypes.xsd**  (…)  **<xs:complexType name="GuaranteeReferenceType07">**  <xs:annotation>  <xs:documentation>  **<usedBy>Used by 1/117 messages: CC055C</usedBy>**  </xs:documentation>  </xs:annotation>  <xs:sequence>  <xs:element name="sequenceNumber" type="SequenceNumberContentType02">  <xs:annotation>  <xs:documentation>  <description value="Sequence number" />  <format value="n..5" />  <optionality value="R" />  <xsdBaseType value="NumericWithoutZero\_5" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="GRN" type="GrnContentType">  <xs:annotation>  <xs:documentation>  <description value="GRN" />  <format value="an..24" />  <optionality value="R" />  <xsdBaseType value="GRNType" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="**InvalidGuaranteeReason**" maxOccurs="9" type="InvalidGuaranteeReasonType01">  <xs:annotation>  <xs:documentation>  <description value="INVALID GUARANTEE REASON" />  <optionality value="R" />  </xs:documentation>  </xs:annotation>  </xs:element>  </xs:sequence>  </xs:complexType>  (…)  <!--================================================================================-->  <!--===== InvalidGuaranteeReason -->  <!--================================================================================-->  <xs:complexType name="**InvalidGuaranteeReasonType01**">  <xs:annotation>  <xs:documentation>  **<usedBy>Used by 1/117 messages: CC055C</usedBy>**  </xs:documentation>  </xs:annotation>  <xs:sequence>  <xs:element name="**sequenceNumber**" type="SequenceNumberContentType02">  <xs:annotation>  <xs:documentation>  <description value="Sequence number" />  <format value="n..5" />  <optionality value="R" />  <xsdBaseType value="NumericWithoutZero\_5" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="**code**" type="CodeContentType04">  <xs:annotation>  <xs:documentation>  <description value="Code" />  <codeList code="CL252" type="business" name="Invalidguaranteereason" />  <format value="an..3" />  <optionality value="R" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="**text**" minOccurs="0" type="TextContentType">  <xs:annotation>  <xs:documentation>  <description value="Text" />  <format value="an..512" />  <optionality value="O" />  <xsdBaseType value="AlphaNumeric\_MAX512\_NoSpaces" />  </xs:documentation>  </xs:annotation>  </xs:element>  </xs:sequence>  </xs:complexType>  (…)  ================================  In **DDNTA-6.2.0-v1.0.0 (incl. Appendix Q2)** and the **CSE-v60.4.0**, the message CC055D shall be corrected to get the multiplicity of the Data Group ‘INVALIDITY GUARANTEE REASON’ corrected as illustrated below: (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  **CC055D - (E\_GUA\_INV) - GUARANTEE NOT VALID**  (…)  ---GUARANTEE REFERENCE 99x R  Sequence number R n..5 R0987  GRN R an..24 G0002  ------INVALID GUARANTEE REASON ~~1x~~ **9x** R  **Sequence number R n..5 R0987**  Code R an..3 CL252  Text O an..512  The **Appendix X** shall be corrected as follows:  **CC055D.xsd**  (…)  <xs:complexType name="CC055DType">  <xs:sequence>  <xs:group ref="MESSAGE" />  <xs:element name="TransitOperation" type="TransitOperationType59">  (…)  <xs:element name="GuaranteeReference" maxOccurs="99" type="GuaranteeReferenceType07">  <xs:annotation>  <xs:documentation>  <description value="GUARANTEE REFERENCE" />  <optionality value="R" />  </xs:documentation>  </xs:annotation>  </xs:element>  (…)  **ctypes.xsd**  (…)  **<xs:complexType name="GuaranteeReferenceType07">**  <xs:annotation>  <xs:documentation>  **<usedBy>Used by 1/117 messages: CC055D</usedBy>**  </xs:documentation>  </xs:annotation>  <xs:sequence>  <xs:element name="sequenceNumber" type="SequenceNumberContentType02">  <xs:annotation>  <xs:documentation>  <description value="Sequence number" />  <format value="n..5" />  <optionality value="R" />  <xsdBaseType value="NumericWithoutZero\_5" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="GRN" type="GrnContentType">  <xs:annotation>  <xs:documentation>  <description value="GRN" />  <format value="an..24" />  <optionality value="R" />  <xsdBaseType value="GRNType" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="**InvalidGuaranteeReason**" maxOccurs="9" type="InvalidGuaranteeReasonType01">  <xs:annotation>  <xs:documentation>  <description value="INVALID GUARANTEE REASON" />  <optionality value="R" />  </xs:documentation>  </xs:annotation>  </xs:element>  </xs:sequence>  </xs:complexType>  (…)  <!--================================================================================-->  <!--===== InvalidGuaranteeReason -->  <!--================================================================================-->  <xs:complexType name="**InvalidGuaranteeReasonType01**">  <xs:annotation>  <xs:documentation>  **<usedBy>Used by 1/117 messages: CC055D</usedBy>**  </xs:documentation>  </xs:annotation>  <xs:sequence>  <xs:element name="**sequenceNumber**" type="SequenceNumberContentType02">  <xs:annotation>  <xs:documentation>  <description value="Sequence number" />  <format value="n..5" />  <optionality value="R" />  <xsdBaseType value="NumericWithoutZero\_5" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="**code**" type="CodeContentType04">  <xs:annotation>  <xs:documentation>  <description value="Code" />  <codeList code="CL252" type="business" name="Invalidguaranteereason" />  <format value="an..3" />  <optionality value="R" />  </xs:documentation>  </xs:annotation>  </xs:element>  <xs:element name="**text**" minOccurs="0" type="TextContentType">  <xs:annotation>  <xs:documentation>  <description value="Text" />  <format value="an..512" />  <optionality value="O" />  <xsdBaseType value="AlphaNumeric\_MAX512\_NoSpaces" />  </xs:documentation>  </xs:annotation>  </xs:element>  </xs:sequence>  </xs:complexType>  (…)  The problem of multiplicity also exists in NCTS-P4, but no correction is defined by DG TAXUD for DDNTA-v20.00, considering the policy to focus on the preparation for NCTS-P5.  **IMPACT ASSESSMENT:**  This correction concerns the structure of the XSD of one single External Domain message, it is proposed to be deployed in a flexible way, nationally defined.  **Proposed** date of applicability in Operations (**T-Ops**):   To be defined nationally. This correction cannot justify a delay in the start of NCTS-P5 operations, considering the limited cases with limited impact.  **Proposed** date of applicability in CT (**T-CT**):                     Not applicable – CC055C not tested via CTA  **Expected** date of approval by ECCG (**T-CAB**):                  13.01.2023  **Risk in case of non-implementation:**  The number of negative IE205 is likely limited in operations. The **number of cases** negative IE205 with more than one invalid guarantee reason is likely *extremely* **\*not\* frequent** [The same issue exists in NCTS-P4 and the problem was never reported as blocking].  A workaround exists if the multiplicity in CD205C is more than one: the CC055C can still be produced by the Customs Officer at Departure by using one code only, complemented with the free text available in the CC055C to explain the other issues identified by the Office of Guarantee and reported in the CD205C.  **Impacted messages:**   * CC055C.   **Impacted CI Artefacts:**   * **CSE-v51.8.0: Yes.** * **DDNTA-5.15.0-v1.00 (Appendices ’Q2\_R\_C’, ‘Q2’, ‘X’): Yes.** * 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: Yes.** * CTS-5.7.1-v1.00: No. * 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: No. * 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:**   * **CSE-v60.4.0: Yes.** * **DDNTA-6.2.0-v1.00 (Appendices ’Q2\_R\_C’, ‘Q2’, ‘X’): Yes.** * DDNTA-6.2.0-v1.00 (Main Document): No. * DDCOM-21-3.0-v1.00: No. * Functional Specifications NCTS-P6 (FSS/BPM): 7.10.0: No |

**Impact on CI artefacts**

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| **DDNTA-5.15.0-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Automated. Appendix X, PDF Q2 generated by SpecsManager.** | |
| **DDNTA-6.2.0-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Automated. Appendix X, PDF Q2 generated by SpecsManager.** | |
| **CSE-51.8.0** | Cosmetic Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3. Minor correction in one message.** | |
| **CSE-60.4.0** | Cosmetic Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3. Minor correction in one message.** | |
| **DMP-5.7.0-v1.00** | Cosmetic Low  Medium  High  Very High  Short description   |  | | --- | | **Update of the XLS files.** | |

The **CTS, TRP and CRP artefacts** will include the next version of **Appendix X (as required for other RFC-Propoosals)**. The correction of CC055C as **NO impact** on the **Conformance Testing Campaign** and **NO impact** on the **conversion by ieCA**.

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | To be assessed by each NA. Small correction in one XSD for one message. But impact on the **External Domain (only)**. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 07/12/2022 | *Draft by SOFTDEV* |
| v0.20 | Upgrade by DG TAXUD/B3 | 22/12/2022 | *Major corrections - Proposed to be part of the RFC-List.37, as requested by NA-IE during the CAB on 21.12.2022.* |
| v1.00 | SfA to NPMs | 08/01/2023 | *For acceptance by NPMs, to unblock NA-IE.* |
| v1.10 | SfA to NPMs with **implementation details** | 30/01/2023 | *Implementing comment received from NA-DE.*  *Typo correction applied on* ***page 1*** *: ‘CD055C’ replaced by ‘CC055C’. made highly visible ~~text removed~~ – text added.*  ***Considered as accepted following absence of other comments from NPMs by 21.01.2023.*** |