# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0175** (RTC-60055) |
| **Related Incident ID** | Linked to **RFC\_DDCOM\_0023** (Maximum size of messages) (RTC-58143) |
| **RFC Initiator / Organization** | TAXUD/B3, CD3 |
| **CI** | **NCTS-P5 (DDNTA-5.14.1 – CSE-v51.6.0)** |
| **Type of Change** | **Standard**  **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | *‘Message size’ updates following the new RFC-Proposal for DDCOM.* | |
| **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-5.14.1 - CSE-v51.6.0): Changes of cardinalities of HOUSE CONSIGNMENT and HCI and related, to keep the maximum message size below 20 MB (22 MB on CD) as per DDCOM.** |

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| This RFC-Proposal implement in NCTS-P5 the limitation defined in RFC\_DDCOM\_0023 for the message size.  DDNTA shall be updated in order to avoid oversized message (i.e. more than 22MB absolute upper limit) in Common Domain.  The multiplicity of Data Groups ‘HOUSE CONSIGNMENT’ and ‘CONSIGNMENT ITEM’ are reduced. The change is applied in Appendix Q2 and in the DDNTA Main Document (to highlight the decision to apply multiplicities different from the maximum values defined in UCC IA/DA Annex B). |

**Section 2: Problem statement**

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| During the Review Cycle of the RFC\_DDCOM\_0023 that defines the Maximum Message size, it appears that there is a requirement to ensure that the messages lodged by traders are never larger than 20 MB, to ensure that the Common Domain messages are not larger than 22 MB.  (Both for AES and NCTS-P5) – *Please refer to the RFC\_DDCOM\_0023 for more details*.  In order not to exceed the maximum message size (of 22MB absolute upper limit for Common Domain) it was proposed (with APO agreed by NPM reviewer) to reduce the multiplicities of specific Data Groups as follows.  **Cardinality Changes:**   1. The multiplicity of <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM> should be restricted to '999x' in place of ‘9999x’. 2. The multiplicity of <CONSIGNMENT-HOUSE CONSIGNMENT > should be restricted to '99x' in place of ‘999x’. 3. The multiplicity of <RISK ANALYSIS IDENTIFICATION – RISK ANALYSIS> will be restricted to '9999x' in place of ‘99999x’.   and one Transit declaration should be limited to the maximum of 1999 Goods Items. |

**Section 3: Description of proposed solution**

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| The **DDNTA-5.14.1 (incl. Appendix Q2) and the CSE-v51.6.0** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):  **Cardinality Changes:**  A./  The multiplicity of <CONSIGNMENT-**HOUSE CONSIGNMENT**> will be restricted to '99x' in place of ‘999x’.  As a result, the message structure of CD001C will be updated as follows:  **Part of CD001C:**  (…)  ------HOUSE CONSIGNMENT ~~9~~99x R E1406  ---------CONSIGNOR 1x D C0349  E1301  G0062  (…)  The same change will be applied for the following messages: CD003C, CD012C, CC013C, CC015C, CC017C, CD018C, CC025C, CC029C, CD038C, CC043C, CC044C, CD050C, CD115C, CD160C, CD165C, CC170C, CC190C, CD200C and CD203C.  B./  The multiplicity of <CONSIGNMENT-HOUSE CONSIGNMENT-**CONSIGNMENT ITEM**> will be restricted to '999x' in place of ‘9999x’.  Consequently, the TRT E1402 can be removed from <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM> (where applicable) and its wording will be modified accordingly.  As a result, the message structure of CD001C will be updated as follows:  **Part of CD001C:**  (…)  ---------CONSIGNMENT ITEM ~~9~~999x R ~~E1402~~  Goods item number R n..5 R0988  Declaration goods item number R n..5 R0007  G0005  Declaration type D an..5 CL232 C0045  G0062  R0601  R0909  ------------CONSIGNEE 1x O B1820  B2400  G0001  (…)  The similar change will be applied for messages: CD003C, CD012C, CC013C, CC015C, CC017C, CD018C, CC025C, CC029C, CD038C, CC043C, CC044C, CD050C, CD115C, CD160C, CD165C, CC170C, CC190C, CD200C and CD203C.  The wording of **E1402** (not applied on all External Domain messages) will be updated as follows:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN ~~/\*/Consignment/HouseConsignment/ConsignmentItem~~  /\*/FunctionalError  /\*/RiskAnalysisIdentification/RiskAnalysis  multiplicity shall be set to '999x'  **Functional Description:**  N/A  With **G0005:**  **Technical Description:**  N/A  **Functional Description:**  The maximum value is 1999 as defined in the XSD pattern.  This Guideline will be assigned on <CONSIGNMENT-HOUSE CONSIGNMENT-**CONSIGNMENT ITEM. Declaration goods item number**> in messages IE001, IE003, IE012, IE013, IE015, IE017, IE018, IE025, IE029, IE038, IE043, IE044, IE050, IE115, IE160, IE165 and IE190.  In addition, the Guideline will be assigned on < on <GOODS SHIPMENT- GOODS ITEM. Transit Declaration goods item number> in IE191 (as per **RFC\_NCTS\_0172 (RTC-59804)**)  C./  The multiplicity of <RISK ANALYSIS IDENTIFICATION – **RISK ANALYSIS**> will be restricted to '9999x' in place of ‘99999x’. The same G0005 will be applied also on ‘Declaration goods item number’.  As a result, the message structure of CD001C will be updated as follows:  **Part of CD001C:**  (…)  RISK ANALYSIS IDENTIFICATION 1x D C0813  Code R a1 CL107 G0041  --- RISK ANALYSIS ~~9~~9999x D C0251  E1402  G0869  Sequence number R n..5 R0987  Declaration goods item number O n..5 G0003  G0005  ~~R0021~~ G0021  ------ RISK ANALYSIS RESULT 99x R E1406  Sequence number R n..5 R0987  Code D an..17 C0715  E1101  G0002  G0821  Risk area code D an..7 CL740 C0715  Text O an..512 E1116  (…)    The same change will be applied for the following messages: CD003C, CD038C, CD050C, CD115C, CD160C and CD165C.  D./  The same G0005 will be applied also on ‘**Declaration goods item number**’ in the Data Group ‘GOODS REFERENCE’. As a result, the message structure of CD001C will be updated as follows:  **Part of CD001C:**  (…)  --- TRANSPORT EQUIPMENT 9999x D C0872, G0103  ------ SEAL 99x D C0569  Sequence number R n..5 R0987  Identifier R an..20 R0107  ------ GOODS REFERENCE 9999x D C0670, G0670  Sequence number R n..5 R0987  Declaration goods item number R n..5 G0005  G0006  (…)  With **G0005:**  **Technical Description:**  N/A  **Functional Description:**  The maximum value is 1999 as defined in the XSD pattern.  The same change will be applied for the following messages: CD001C, CD003C, CC007C, CD012C, CC013C, CC015C, CC017C, CD018C, CC029C, CD038C, CC043C, CC044C, CD050C, CD115C, CD160C, CD165C, CC170C, CD180C, CD181C and CC182C.  E./  The DDNTA-Appendix X will be adapted accordingly.  F./  **Updates in DDNTA Main Document:[[1]](#footnote-1)**  In DDNTA-5.14.1-v1.00 (Main Document) in section “**I.III.4 Justified deviations from UCC Data Annex B**” the “*Table 4: Justified deviations from UCC Data Annex B [A18]*” will be updated to document/highlight the decision to apply different multiplicities from the maximum values defined in UCC IA Annex B.  The following note will be added after the table:  **Note:** It shall be noted that from this version of DDNTA, the Data Group <HOUSE CONSIGNMENT> will be presented with 99x repetitions (instead of 999x) and the Data Group <CONSIGNMENT ITEM> will be presented with 999x repetitions (instead of 9999x), applying different multiplicities from the maximum values defined in UCC IA Annex B. The maximum number of Goods Items in one transit declaration will be restricted from the theoretical 9 999 999 to 1 999, aligned to the business requirements and with the legal framework.  **NCTS-Data Mapping-v0.43 file:** This file will be updated to depict the change that is described above, regarding the messages IE001, IE003, IE012, IE013, IE015, IE025, IE029, IE038, IE043, IE044, IE050, IE115, IE200 and IE203.  **IMPACT ASSESSMENT:**  The proposed changes has no impact on business continuity assuming that all NAs are respecting the legacy constraints during the Transitional Period.  There is no risk of rejections on the Common Domain during the TP.  All NTAs **must** be aligned to RFC-List.36 before the end of the Transitional Period. **Strictly**.  **Open movements and L³ movements:**n  No problem of open movements.  **Impact in case of no Implementation**  After the end of TP, in case of not implementing this change, errors will occur in the terms of the “Maximum message size”, as described in RFC\_DDCOM\_0023 (IE917).  **Proposed** date of applicability in Operations (**T-Ops**):   at the latest on 01.12.2023 (**flexible**)  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  February 2022  **Impact on transition**: Yes  **Risk of not implementing the change:** Yes  **Impacted CI Artefacts:**   * **CSE-v51.6.0: Yes;** * **DDNTA-5.14.1-v1.00 (Appendix Q2\_R\_C, K PDFs, Appendix X): Yes;** * **DDNTA-5.14.1-v1.00 (Main Document): Yes;** * **DMP Package-5.6.0-SfA-v1.00 (incl. update of file Rules and Conditions\_v0.43): Yes;** * **ACS-5.5.0 & ACS-Annex-NCTS-5.5.0: Yes;** * **CTP-5.7.0-v1.00: Yes;** * **TRP-5.8.1: Yes;** * **CRP-v5.5.0-v1.00: Yes;** * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No; * UCC IA/DA Annex B: No; * Functional Specifications (FSS/BPM): No; * DDCOM v20.3.0-v1.00: No; * ieCA 1.0.1.0: No; * CS/RD2\_DATA: No; * CS/MIS2\_DATA: No; * CTS-5.6.1-v1.00: No |

**Impact on CI artefacts**

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| **CSE-v51.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **As described in section 3** | |
| **DDNTA-5.14.1 - v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices generated by CSE + Appendix Q2, Q2\_R\_C** | |
| **DMP Package-5.6.0 SfA-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **NCTS- Data Mapping- v0.43 file, Rules and Conditions\_v0.43** | |
| **CTP-5.8.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of scenarios according to the updates of specifications.** | |
| **CRP-5.5.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **A new version of CRP will be published due to the updates of its components.** | |
| **NCTS\_TRP-5.8.1-v1.01** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of messages according to the updates of specifications.**  **(update of XSD)** | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Some NTA are already implementing some size restrictions. Some others are under development. Some other NTAs may require additional efforts.**  **Each NA is invited to carefully assess the impact for their NTA and for their trader specifications.** | |

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 31/01/2021 | *Draft by CUSTDEV* |
| V0.20 | Update by DG TAXUD/B3 & CD3 | 07/02/2022 |  |
| v1.00 | SfA to NPMs | 07/02/2022 | *RFC-Proposal Emergency – Change related to RFC\_DDCOM\_0023 to avoid oversized messages.* |

1. These changes will also be mentioned in the RFC\_NCTS\_0116 (RTC-56497) dedicated to the justified differences against the UCC Annex B. [↑](#footnote-ref-1)