To:
The Collector of Customs
New Custom House
Ballard Estate
Bombay-400 038.

Dear Sir,

1. With great expectations, Members of our Association had undergone hardships, when Customs started the work of installing computers like: -

   i) When Appraising Hall was being re-fitted, Appraising Groups were being constantly shifted and re-shifted from one place to another and members had to climb number of floors as lifts were overcrowded or out of order.

   ii) Large amount of dock demurrages had to be paid, which necessitated long explanations and justifications.

2. We have borne this patiently with great hopes that the introduction of computers will greatly expedite clearance. Except for a brief period when Appraisers and Ministerial Staff were made to come on Saturdays and Sundays and clear the pending documents, our experience has been most disappointing, because the total period for processing documents has actually increased by more than four times, compared to time before the computer was introduced.

3. The reasons for the increase in the period for processing documents as we feel is briefly: -

   a) The new system puts great emphasis on the supervision by the Assistant Collector, whereas the cabins, where the Asstt. Collectors sit have been totally isolated from where the Appraisers/Ministerial Staff sit. Therefore there is no supervision at all possible.

   Some of the Assistant Collectors are totally indifferent and there is no system to control them, probably because they are not liable for demurrages of B.P.T. or container detention charges of carriers.

   .2/.
b) The system places great importance on the Customs sepoys/peons, who are the persons to whom CHAs/importers could approach to locate the whereabouts of their Bills of Entry in the department and as such they have capitalised the situation to their maximum personal benefits.

c) The system places great emphasis on the Ministerial Staff particularly, the K.P.O.s, who are totally indifferent and seemingly unaccountable and so take undue advantage of the situation, since CHAs are not able to meet them and coax them to work.

d) Due to malfunctioning of the Computer System and their peripheral units, or due to various other reasons not known to us, the Computers frequently break down, in spite of repeated assurances in the past given to us that this was only the "teething" problem accompanying the immediate installation of the entire system. Unfortunately, there seems to be no end to the "teething" trouble which has now become chronic.

e) The continued disruption of this Computer system has provided an easy "scape goat" attitude by all Departmental personnel for blaming the malfunctioning to justify their attitude.

f) The Computer system envisaged easy retrieval of records of previous imports, being made available to importers/CHAs, whenever desired. Regretfully however though it is occasionally available, easier availability of this information is emphatically requested for, in the greater interest of expeditious clearance.

g) The Computer system also is involved in the working of other areas besides Appraising, such as Licensing, Cash, Bond and Test report recording, all of which are taking exceptionally long periods for operations & completion.

4. It may be emphasised that it is not only Appraising & Auditing, is required to be done within 24 hours, but the computer processing of Import Licence, Cash Dept. and Docks department needs to be greatly expedited.

5. We enclose herewith a Flow Chart of the procedures which will show that the pre-computerisation procedures have now multiplied, with the consequential increase in time.

6. We are afraid that the procedures have been multiplied with total disregard to the original concept of expeditious clearance, & that with the addition of any new stage/procedure clearance is even greater delayed. To the/computer manual system, Customs have added the computer stages with the obvious increase in procedures.
We were given to understand that the original system envisaged completion of all stages within a minimum of 1 day to a maximum of 2 days, whereas our experience is minimum of 6/8 working days to a maximum of 'no limit'.

7. We enclose herewith Flow Chart, for your reference of the present system, which is self explanatory.

8. As far as we understand, the computer is at present, only serving as a "statistical data base", which in case of statistics, was previously done on a "post importation" basis and as far as "valuation", we notice that the Appraising Group and Assessment Appraisers still keep their records manually.

9. We find that every movement from one table to the other is routed through the clerk, who maintains a Register, which gives him an excuse to delay the Bill of Entry.

SUGGESTIONS:

We, therefore, suggest the following revised procedures:

1) We feel that T.O.G. should be shifted away from the Appraising Department. The clerk should give a receipt on the form filled by us acknowledging the Bill of Entry showing the date and time of receipt, Import Dept's Serial No., along with the Appraiser's name to whom the Bill of Entry is being marked. This should be given in duplicate, one copy of which will be returned duly signed.

11) It should be the responsibility of the receiving clerk to collect every hour, Bills of Entry from the T.O.G. clerk and hand it over to the respective Appraiser.

1ii) The Appraiser will either complete the Bill of Entry on the same day or issue a query Memo which along with the Bill of Entry should go to the concerned Group Clerk, for handing it over to the GIA every evening, computerised statements could be put up on the Group Notice Board showing the Bill of Entry Import Serial Number and GIA's name, against which Query Memos have been issued for that day by the Group Clerk.

iv) Replies to the Query Memos together with all relevant documents, along with xerox copy of Query Memo would be returned to the Group Clerk, who will give an acknowledgement on the xerox copy of Query Memo giving the time and date of receipt, he shall thereafter personally deliver the Bill of Entry, with the reply to the Query Memo to the Appraiser concerned.
iv) On completing the B/Entry, the Appraiser shall personally handover the B/Entry to the concurrent Auditor, who should be sitting by the side of the Appraisers.

v) In case, the auditor has any objection, he will record the same on the reverse of the B/Entry, hand it over to the appraiser, who will issue a Query Memo if necessary. In case, the auditor feels it necessary, he shall personally carry the B/Entry to his Asstt. Collector and discuss the matter with him.

vi) It should be the responsibility of the Auditor to pass the B/Entry within a maximum of 3 hours of receipt from the Appraiser.

vii) It should be the responsibility of the sepoy to collect the B/Entry from the Auditor and pass it on to the Assistant Collector.

After the Asstt. Collector has signed the B/Entry, it should be the responsibility of the Group Clerk to pass the B/Entry from the Asstt. Collector to the Licence Section with the help of a sepoy/peon. Preferably, B/Entry could be handed to CHA, who will deliver it to the Licence Section.

viii) The Asstt. Collector should not take more than one hour to complete the B/Entry and any queries should be dealt with immediately by him directly with the Appraiser.

ix) The B/Entry should go the Licence Section, where TD/Licence entry should be done and simultaneously with Licence entries, after which, the B/Entry should come for manually entering in the Licence Register and calculation and certification of duty.

x) The time limit for TD/Licence, debit/OGL, data entry should not exceed two hours.

xi) The Dy. Collectors should daily visit the cabins of the Asstt. Collector between 4 p.m. and 5 p.m. & ensure that no pending remain for the following day.

xii) There should be an independent cell under an Asstt. Collector, who with sufficient appraisers shall reply to enquiry slips, giving the whereabouts of the B/Entry, and who will also physically check every hour that there is no hold up at any stage.
xiii) Custom House should provide sufficient photo-copying machines in every computer centre so that when the computer fails, the photo-copying machines should be immediately put to use.

xiv) Every Friday afternoon, the Deputy Collector in charge of Appraising Groups as also concurrent Audit Group should take stock of pending Bills of Entry and if all are not disposed off, arrange to process by keeping the staff late or calling the staff on Saturday.

You will appreciate that the introduction of the Computer system and the consequential delays has also contributed to the dock congestion, which at Timber Pond has become chaotic, making Bombay Port one of the most expensive port in India causing importers to now plan their imports through other ports which would in turn affect Revenue collection at the Bombay Collectorate.

Association is of the considered opinion that if the above suggestions are put into operation, the time for processing will/greatly reduced, and any such request for an appointment if necessary to discuss the situation more completely.

Thanking you for the continuous co-operation and importance given to the suggestions made by our Association, and assuring you of our wholehearted co-operation.

Yours faithfully,

(PRAVIN KAMAKIA)
President.

Encl: a.d.