



CBP Importer Identity Accuracy

What the published Form 5106 notice means for importers and customs brokers

Federal Register Notice 2026-16911 (91 FR 53627)

1

WHAT CBP ANNOUNCED

CBP is taking initial steps to implement Executive Order 14411 by using enhanced enforcement procedures to verify the accuracy of importer of record data submitted on CBP Form 5106.

Importers of Record (IORs), and customs brokers providing information on an IOR's behalf, must provide accurate and complete information.



2

CORE FORM 5106 DATA TO VERIFY

- ✓ Importer name
- ✓ IRS EIN / SSN / CBP-assigned number
- ✓ Mailing address
- ✓ Physical location address (if different from mailing address)
- ✓ Phone number
- ✓ Email address



CBP Form 5106 also contains additional optional fields such as company, business structure, beneficial ownership, and company officers.

3

WHAT MUST BELONG DIRECTLY TO THE IOR

- Physical address must be the actual physical location of the business or individual.
- It cannot be a registered agent, customs broker, freight forwarder, P.O. box, business service center, or the address of another person or entity.
- Email address must be valid and belong to the IOR.
- Phone number must be valid and belong to the IOR.
- Customs brokers or third parties may not use their own email address or phone number in place of the IOR's.



4

BROKER DUE DILIGENCE MATTERS

- Brokers must exercise due diligence before transmitting Form 5106 information.
- Brokers should not transmit information they know or should know is false or misleading, including unverified information.
- Brokers must have a valid Power of Attorney executed directly with the IOR.
- The POA cannot be executed through a freight forwarder or other third party.



5

POSSIBLE CONSEQUENCES

- Beginning September 18, 2026, CBP may immediately void an IOR number if the Form 5106 information is inaccurate or incomplete.
- A voided IOR number becomes invalid for any purpose, including entering imported merchandise into the United States.
- CBP may also take other enforcement actions, as appropriate.
- Written notice will be sent to the IOR at the most recently submitted email address.
- If applicable, CBP will copy the customs broker that last filed entry on behalf of the IOR.
- Questions and reestablishment requests: IORProgram@cbp.dhs.gov



6

WHY THIS MATTERS NOW

Keeping Form 5106 identity data accurate and current may help avoid disruptions, entry issues, and avoidable compliance problems.

