

WHITE PAPER · OCTOBER 2026

The Mail Route Just Narrowed: PGA Data Is the Price of Entry

What CBP's postal overhaul and CPSC's live mandate require before 20 January 2027

by Hurricane

Executive Summary.....	3
01 · The Postal Rulebook Rewrite	4
A Decade of Informal Entry	4
What Changes on 20 January 2027	4
The Filer Question	5
02 · CPSC: Already Live, Already Enforced	6
The Mandate In Force.....	6
Two Filing Routes	6
No Auto-Reject, Not No Risk.....	6
03 · The PGA Data Problem	8
Fifty Agencies, Fifty Schemas	8
Why the Fields Change by HS Code	8
The Scale Challenge.....	9
04 · The Legal Backdrop	10
Axle of Dearborn and the IEEPA Question	10
The Statutory Backstop: 2027	10
05 · Building Your Readiness Now	11
06 · How Hurricane Commerce Helps	12
The Intelligence Layer for Global Trade	12
Intelligence Creates Competitive Advantage	12
Conclusion: Readiness Is the Advantage	13

Executive Summary

For most of the past decade, de minimis shipments moving through the US postal network cleared with a handful of data points: a brief description, a declared value, a country of origin. That system is being dismantled in stages through 2026.

On 24 July 2026, US Customs and Border Protection replaced the old spreadsheet-based mail process with a new postal informal entry system. It gave a narrow set of shipments, those flagged by a Partner Government Agency (PGA), those claiming Chapter 98 or 99 treatment, and those relying on a free trade agreement, a temporary grace period inside the simplified route. That grace period, originally due to close on 22 October 2026, now ends on 20 January 2027.

Separately, the Consumer Product Safety Commission's own eFiling mandate has applied since 8 July 2026, with no de minimis carve-out at all. It already reaches CPSC-regulated goods moving through every de minimis channel, postal or not.

Neither change is really about a single deadline. Both point to the same underlying shift: US customs now expects product-level data, classified correctly and matched to the right regulatory agency, before goods move. The businesses that build this capability now will clear mail shipments without disruption. The ones that wait will find out on 20 January 2027 which of their SKUs were never PGA-compliant in the first place.

The exemption ended in July. The shortcut around it now ends in January.

This white paper sets out what changes, why the required data differs by HS code, and what shippers, carriers, and platforms need in place before the grace period runs out.

POSTAL ROUTE ENDS	CPSC LIVE SINCE	PGA AGENCIES	STATUTORY BACKSTOP
20 Jan '27	8 Jul '26	~50	1 Jul '27
Grace period closes for PGA, Ch.98/99, and FTA claims	No de minimis carve-out, on any channel	Each with its own data schema	De minimis ends by law, whatever the courts decide

A Decade of Informal Entry

The US postal system has long run on a simplified process. De minimis mail shipments moved through an informal entry route built around a monthly spreadsheet, the International Mail Duty Worksheet, rather than a formal customs filing. It worked because volumes were manageable and the goods involved rarely needed anything beyond a description and a value.

That assumption broke down as direct-to-consumer platforms scaled. By the time CBP moved to replace the old process, postal volumes had grown far beyond what a spreadsheet-based system could support, and a meaningful share of that volume included goods that needed more than a description: toys, electronics, cosmetics, vehicle parts, goods regulated by one of roughly fifty partner government agencies.

CBP's answer was a new postal informal entry process, effective 24 July 2026. But the agency didn't switch every category over at once. PGA-regulated goods, HTSUS Chapter 98 and 99 goods, and shipments claiming free trade agreement duty-free treatment kept access to the simplified route for a defined window. That window, due to close on 22 October 2026, now ends on 20 January 2027.

What Changes on 20 January 2027

After 20 January 2027, these categories lose access to the simplified postal process entirely. The rule text gives filers two options at that point: formal entry, the same standard CBP applies to commercial freight, or the new Entry Type 13 test, which CBP's rule explicitly names as an alternative for shipments that would otherwise fall out of the postal process. Quota goods and goods subject to antidumping or countervailing duty never had either option; they've been excluded from the postal process, and from Entry Type 13, since 24 July 2026.

The rule change also narrows who can file. Foreign postal operators, who had been filing as "nonbroker qualified third parties," lose that eligibility on 20 January 2027. From that date, only the owner, the purchaser, or a licensed customs broker can file the entry, whichever route they choose.

What changes on 20 January 2027, and what doesn't

- PGA-regulated goods, HTSUS Ch.98/99 goods, and FTA duty-free claims lose the simplified postal route and move to formal entry, or to Entry Type 13 if the filer opts in
- Quota goods and AD/CVD goods: no change, and no Entry Type 13 either, they've needed formal entry since 24 July 2026 already
- Foreign postal operators can no longer file as third parties; only the owner, the purchaser, or a licensed customs broker may file, under either route
- Entry Type 13 reached full production on 22 September 2026, gives PGA-flagged and Ch.98/99 shipments an informal entry pathway again, but only for shipments valued at \$2,500 or less
- Participation in Entry Type 13 is voluntary: CBP hasn't announced a mandatory transition date, and formal entry stays the default for anyone who doesn't opt in

The Filer Question

Losing eligibility to file matters more than it sounds. A postal operator that has spent years having entries filed as a matter of course via the services of USPS now needs a different arrangement for every shipment that falls outside the simplified route: an agreement with the owner or purchaser, or a relationship with a licensed customs broker who can file on their behalf, whether the shipment goes through formal entry or Entry Type 13.

For carriers and platforms moving meaningful PGA-flagged or Chapter 98/99 volume, this calls for an operational redesign to be in place before 20 January 2027, not started after it. Deciding who files, choosing between formal entry and Entry Type 13 for shipments under the \$2,500 cap, and confirming that arrangement in writing, is a task for now, not for the last weeks of the extension.

Grace periods expire. This one now expires on 20 January 2027, whether or not the redesign behind it is ready.

The practical test is simple: for every shipment that currently relies on the simplified postal route and falls into a PGA, Chapter 98/99, or FTA category, is there a named filer of record ready to take over on 20 January 2027, and a decision made on which of the two available routes it will use? If the answer is no, that is the first gap to close.

CPSC: Already Live, Already Enforced

The Mandate In Force

While the postal industry focuses on the January 2027 deadline, the Consumer Product Safety Commission's own requirement has already been running for months. CPSC's eFiling mandate took effect on 8 July 2026 for general imports, with Foreign Trade Zone entries following on 8 January 2027. The underlying rule, 16 CFR Part 1110, carries no de minimis exemption whatsoever.

That last point is easy to miss. A sub-\$800 shipment moving through the existing non-postal de minimis channel, Entry Type 86, still needs a CPSC certificate if the product is CPSC-regulated. Value doesn't buy an exemption here. Category does.

Two Filing Routes

CPSC gives filers two ways to submit the required data. A Reference PGA Message Set registers the product once in CPSC's Product Registry, then cites a Certifier ID, Product ID, and Version ID on every shipment after that. A Full PGA Message Set resubmits every data element on every shipment, with no registry shortcut.

Neither route is wrong. The Reference route scales better for repeat SKUs; the Full route suits low-volume or one-off imports. The choice is an operational one, made once per product line rather than once per business.

No Auto-Reject, Not No Risk

CBP has clarified that shipments won't be auto-rejected purely for incomplete CPSC message-set data. That's a narrower protection than it sounds. CPSC keeps its own authority to review filings and pursue enforcement, separately from whatever CBP's system does at the border. A shipment that clears customs today can still draw CPSC's attention next month. Treat CBP's leniency as a processing detail, not a compliance verdict.

The seven CPSC data elements every regulated shipment needs on file

- Product identifier
- Safety-rule citation code (or codes)
- Manufacture date
- Manufacture place
- Test date
- Testing laboratory
- Point of contact for records

CPSC's mandate has been enforcing since July, well ahead of the postal industry's January 2027 deadline.

For any business that classified this as a postal-sector problem with a January 2027 start date, CPSC's timeline is the correction. The mandate is live now, it applies regardless of channel, and the businesses still catching up are already months behind it.

Fifty Agencies, Fifty Schemas

Underneath every deadline in this paper sits the same operational question: what data does a given product need before it can clear? The answer, uncomfortably, depends on which agency's flag sits against that product's HTS code.

CBP doesn't ask one generic PGA question. It runs every HTS code against a flag table covering roughly fifty partner government agencies, and each of those agencies maintains its own ACE "PGA Message Set": its own schema, its own required fields. A single line about "extra data needed at the border" understates what's happening. The fields, the certificates, and whether registration applies at all change completely depending on which agency's flag is set.

There are a total of 49 recognised PGA agencies, of which CBP will be actively expecting information from 22 of the agencies involved in physical commodities, for example:

Agency	Typical goods	Distinct data required
CPSC	Toys, furniture, electronics, textiles	Seven certificate elements: product ID, safety-rule citation code, manufacture date and place, test date, testing lab, point of contact
FDA	Food, cosmetics, supplements, medical devices, pharma	FDA product code, country of production, manufacturer and shipper details, ultimate consignee, plus commodity-specific Prior Notice data
NHTSA	Vehicles and vehicle equipment	VIN, model, manufacture month and year, and program codes that vary by complete vehicle versus regulated component

Why the Fields Change by HS Code

Two products can sit a few digits apart in the tariff schedule and face entirely different filing requirements. A children's toy classified under one HTS code carries CPSC's certificate obligations. A cosmetic a few headings over answers to FDA instead, with its own product code and Prior Notice data. A vehicle component further down the schedule needs a VIN and NHTSA program codes that have nothing to do with either.

Classification decides more than duty. It decides which agency's rulebook applies, and which of roughly fifty different data schemas a shipment has to satisfy before it clears.

The Scale Challenge

For a single SKU, this is manageable. For a catalogue of ten thousand, it isn't. Every product needs classification to the correct HS code, a check against the PGA flag table, and, where a flag applies, the specific data set that agency requires. Manual lookup doesn't hold up at that volume, and the agencies update their requirements independently of each other and of CBP's own schedule.

The organisations already ahead on this treat product data as infrastructure rather than a per-shipment task. They classify once, maintain that classification against agency updates, and generate the required PGA data automatically at the point of filing.

The product data requirements now in force

- 10-digit HS classification confirmed for every product before it ships
- PGA flag status checked against the current CBP flag table, not a cached copy
- Agency-specific data assembled per shipment, across CPSC, FDA, NHTSA, and the roughly 47 others
- Classification currency maintained against WCO and CBP schedule updates
- Filer of record confirmed for every shipment losing postal eligibility on 20 January 2027
- Misclassification liability sits with the importer of record, or the platform in marketplace models

Product data was once a back-office detail. Now it decides whether a shipment clears the border.

Axle of Dearborn and the IEEPA Question

Some importers are still betting the exemption comes back. On 13 August 2026, the US Court of International Trade ruled in *Axle of Dearborn, Inc. v. Department of Commerce*, upholding the executive branch's authority under the International Emergency Economic Powers Act to suspend de minimis treatment. The court treated the exemption as a discretionary administrative privilege, not a right importers could claim against.

Some coverage suggests further appeal is possible, and the case rests on different legal ground than the Section 321-based postal rules covered in this paper. But it strengthens the overall legal footing for the suspension, and it's a weak foundation for betting that the old rules return.

The Statutory Backstop: 2027

Even a successful legal challenge wouldn't buy much time. Separately from the CBP rules and the litigation, the One Big Beautiful Bill Act terminates the de minimis exemption by statute, effective 1 July 2027. Whatever happens in court between now and then, the exemption ends on the calendar regardless.

For any business planning around the possibility that de minimis returns, the planning horizon is short and getting shorter.

Courts can argue about authority. They can't argue with a statute that already has a date on it.

Building Your Readiness Now

The changes in this paper aren't emerging risks. The CPSC mandate is live. The postal grace period has a fixed end date. The statutory backstop is already written into law. The question for any brand, marketplace, carrier, or postal operator moving mail volume into the US is not whether to respond, it's whether the response gets built before 20 January 2027 or after it.

Five priorities should shape that response.

1 Map Your PGA Exposure Now

Run your product catalogue against the current CBP PGA flag table, not a cached or historical version. Identify every SKU that triggers a CPSC, FDA, NHTSA, or other agency flag, and separate that population from the goods that clear on classification and value alone. This audit is the foundation everything else on this list depends on.

2 Separate Your Postal and Express Volume

Postal shipments, express couriers, and Entry Type 86 non-postal shipments now sit under different rules with different timelines. Treating them as one undifferentiated flow of "low-value imports" risks missing which deadline applies to which shipment.

3 Get CPSC Filing-Ready Before Enforcement Catches Up

CPSC's mandate has been running since July, and CBP's decision not to auto-reject incomplete filings only controls what happens at the border, CPSC can still act later on the same filing. Decide between the Reference and Full Message Set routes now, and register repeat SKUs in the Product Registry before volume forces the decision.

4 Confirm Your Filer of Record

Postal operators lose third-party filing eligibility for the affected categories on 20 January 2027. Confirm before then whether the owner, the purchaser, or a licensed customs broker will file each affected shipment, and put that arrangement in writing.

5 Build the PGA Data Layer, Don't Improvise It

Manual, agency-by-agency lookup does not hold up at catalogue scale, and it does not stay current against updates that CPSC, FDA, NHTSA, and the rest issue independently of each other. The organisations moving fastest treat PGA data as infrastructure: classified once, checked against the live flag table, and assembled automatically into the schema each agency requires.

The Intelligence Layer for Global Trade

Hurricane Commerce built the Global Trade Ecosystem (GTE) for exactly this kind of regulatory complexity: fifty agencies, fifty schemas, and a classification step that decides which of them applies. The GTE isn't a compliance checklist. It's a trade intelligence platform that gives carriers, postal operators, freight forwarders, marketplaces, and brands the data, decisions, and automation they need to file correctly at scale.

PRODUCT INTELLIGENCE	TRADE INTELLIGENCE	LOGISTICS INTELLIGENCE
<ul style="list-style-type: none"> • AI-powered HS and PGA flag classification at scale • Product data enrichment and gap-filling • Restricted and prohibited goods screening • PGA requirement identification by HTS code • Classification currency management against WCO and agency updates 	<ul style="list-style-type: none"> • CPSC Reference and Full Message Set support • Agency-specific data assembly across CPSC, FDA, NHTSA, and beyond • De minimis and formal entry routing logic • Country-specific customs and regulatory screening • Filer-of-record and entry-type guidance for postal and express channels 	<ul style="list-style-type: none"> • Customs clearance readiness before goods move • Data quality validation against destination requirements • Carrier and postal operator integration • Documentation generation and management • Exception management and resolution support

Intelligence Creates Competitive Advantage

Most customs technology sells compliance: the minimum needed to satisfy a regulator. Hurricane sells intelligence, the ability to know what a shipment needs before it moves, rather than explain what went wrong after CBP or CPSC flags it.

Conclusion: Readiness Is the Advantage

20 January 2027 is a little over three months from the date this paper was published, and it closes a grace period that was always temporary and has already been extended once. CPSC's mandate is already live. The statutory backstop is already law. Every business moving mail volume into the United States faces the same regulatory reality, and won't respond to it the same way.

Some will treat this as a compliance problem: patch the gaps, absorb the disruption, wait for clarity that isn't coming. Others will treat it as an intelligence problem: build the classification and PGA data infrastructure that turns regulatory complexity into an operating advantage.

Hurricane Commerce is built to help with the second path. Our Global Trade Ecosystem gives your organisation the product intelligence, trade intelligence, and logistics intelligence it needs to file confidently under the new postal rules, and to keep filing confidently as the requirements keep changing.

The postal shortcut is closing. The advantage goes to whoever stops relying on it first.

About Hurricane Commerce

Hurricane Commerce is a global trade intelligence company. Through the Global Trade Ecosystem (GTE), Hurricane provides the data, decisions, and automation that let businesses operate within complex regulatory environments with confidence. Clients include international carriers, postal operators, freight forwarders, e-commerce platforms, and brands operating across the world's most demanding customs environments.

Find out how Hurricane can help your organisation get ready for 20 January 2027.

Visit: hurricanecommerce.com | Email: sales@hurricanecommerce.com

Disclaimer: This white paper is provided for informational purposes only and does not constitute legal or regulatory advice. Regulatory information reflects publicly available sources as at October 2026. Organisations should seek independent legal and compliance advice appropriate to their specific circumstances.

© 2026 Hurricane Commerce. All rights reserved. | hurricanecommerce.com

**Know what is in
every parcel.
And prove it before
the border.**

Hurricane Commerce

Global trade compliance and technology

hello@hurricanecommerce.com