

The “eFiles” platform ticketing & tagging functionality

There are **three instances** in which you’ll want to create a ticket on the PAAB eFiles platform:

i. Create a ticket to tag instances where PAAB failed to meet your expectation or exceeded your expectation in relation to review quality.

Tags create a confidential record of issues encountered during the preclearance process for periodic internal or external audit. Tags are NOT a communication tool for resolving issues during the live review of the file. In fact, the eFiles platform **does not show client tags to the reviewers**. Clients must therefore continue to utilize written and verbal correspondences to move files forward and to obtain clarification. Tags are not just for identifying pain points. When you have an experience that was particularly helpful, tag those too. This helps to reinforce and build on interactions that provide value to the customer as well.



Neither the tags nor the corresponding content in the “Comments” field are visible to reviewers.

It’s important to specify what triggered your decision to select a tag in the “Comments” field. This context helps the auditor assess the validity of the tag and to determine what steps can be taken to improve your preclearance experience in the future. Aggregated anonymous reports will periodically be made available. Reports can be found by [Clicking Here](#)

Tagging a PAAB letter or PAAB phone call takes only a few seconds. [Click Here](#) to access a slide deck containing instructional videos (on slides 5 and 6). In addition to providing instructions, the videos provide reassurance that **reviewers cannot see client tags**. The videos conclude with the reviewer view of a tagged submission for further confidence in anonymity. [Click here](#) to see some commonly asked questions and post any additional question on the linked Forum port.

See the [Appendix](#) below for a list of the available tags and the rationale for selecting each tag.

ii. Create a ticket in order to submit requests for calls with reviewers.

- **Call requests relating to a review letter:** These can only be arranged through the eFiles platform. Please identify the comment numbers for discussion during the call in the “Details” field. Also list the call

attendees.

- **Call requests relating to a general question:** These can be arranged either through the eFiles platform or by clicking the “Questions for Reviewers” button which is accessible at the extreme top of every page on the [PAAB website](#). We strongly suggest generating these requests through the eFiles platform if you have an account.
- Doing so provides two distinct benefits:
 - ✓ Some of the form fields will be auto-populated
 - ✓ You’ll have the ability to provide feedback on the call by re-opening the call request ticket from your account at anytime to add a tag. Although tickets generated for call requests are visible to reviewers, the tags and corresponding “Comments” field content placed within these tickets are **NOT** visible to the reviewer (as demonstrated in the video link presented above).

Please briefly describe the question in the “Details” field. For information on what qualifies as a general question, [Click Here](#).

Content entered into the “Details” field (unlike content entered into the “Comments” field) is visible to the reviewer. This information helps the reviewer prepare for the call.

Please note that all calls are recorded for quality assurance, training and auditing purposes.

iii. **Requests for Escalation.**

Once the criteria for escalation calls listed in PAAB code section 1.6.F.2 have been met, the submission’s primary client contact can submit a new ticket requesting a call to be arranged at a specific time.

The “Details” field of this ticket must include:

- A clear statement that this ticket is a request to escalate a matter that has been previously discussed and responded to in writing with the Reviewer of record
- Specification of the points for discussion and any details relevant to this matter
- A list of attendees on the call including those from the manufacturer

Submit the ticket and a member of our File Coordinator team will follow up internally with the Reviewer and the Director of Preclearance Services for date and time availabilities for this call. Once a date and time is confirmed with all parties, the client will be required to provide conferencing details to allow participants to dial into this call.

Appendix: Tags and descriptions

Client Tags	Description & Instructions
<p>Inconsistency perceived because objection to content previously approved for the brand was maintained <u>after</u> directing PAAB to the prior approval eFile #</p>	<p>The ticket must identify all of the following in the "Comments" field:</p> <ul style="list-style-type: none"> • The PAAB comment # and ruling in question • The prior approved eFile # <u>that was provided</u> in the submission. • How/when the PAAB was notified {e.g. "in initial submission copydeck" or "the call recorded on January 15, 2024", "the resubmission letter from August 3, 2024"}. Keep in mind that the copydeck is expected to identify copy lifted from the brand's prior APS.
<p>Inconsistency perceived because objection was maintained <u>after</u> demonstrating that the same presentation was approved for a different brand</p>	<p>Ticket must include all of the following in the "Comments" field:</p> <ul style="list-style-type: none"> • The file name and submission date of the image/screenshot document which was uploaded to your eFile submission in order to support an argument for reconsideration of the reviewer's position. • An explanation of why you continue to perceive the reviewer's final ruling to be inconsistent with the other brand's APS despite the reviewer's clarification.
<p>Ruling perceived to be inconsistent with the code/guidance</p>	<p>The "Comments" field must identify the PAAB response date, comment number, ruling which is perceived to be inconsistent with the code/guidance AND the applicable code section or guidance document. Also clarify how/why the ruling is perceived to be inconsistent. Details are key. The more detail you provide the easier it is to validate and take action on.</p>
<p>PAAB did not return call at agreed upon time</p>	<p>This tag must be added to the ticket which was created to schedule the call in question.</p>
<p>Incomplete review perceived to be unwarranted</p>	<p>This ticket should clarify why the client disagrees with the decision not to perform a line-by-line review (in the "Comments" field).</p>
<p>Perceived issue with level of expertise</p>	<p>This ticket must clarify specifically what triggered this perception (in the "Comments" field). Be specific.</p>

Particularly helpful comment/discussion/action	Please provide details that clarify what we've done to trigger this tag so that we can be sure to do more of it in the future.
The requested revision was unclear to me even following a clarification phone call	<ul style="list-style-type: none"> • Use this ticket when you do not understand the PAAB comment even after a call with a reviewer to better understand the request. • The ticket must identify the unclear comment and must clarify how it is unclear (in the "Comments" field). • Do <u>not</u> use this tag if you understand the PAAB's position but you disagree with it. There is a different tag for that!! i.e. the tag "Consider changing the code guidance"
Ruling perceived to be inconsistent with code/guidance	Use this tag when you understand the PAAB comment but you feel it is inconsistent with the PAAB code/guidances. Identify the comment in question and be specific about which code/guidance the ruling appears to contradict (in the "Comments" field).
Consider changing the code/guidance	Use this tag to identify opportunities for improvement of the code/guidances. Please propose wording for consideration.
Consider changing PAAB process and procedure	Use this tag to identify opportunities for improvement of PAAB processes or procedures (e.g. ARO process, renewal process etc). Be sure to be specific about rationale and application of the suggestions.
Confrontational PAAB representative	Ticket must identify the PAAB representative's actions which were considered confrontational. Please provide any relevant context.
Issue which is perceived to be new was raised late in the review	<ul style="list-style-type: none"> • Use this tag when you feel that an issue was raised later in the review than it should have been (in the "Comments" field). Be specific. • The ticket must identify which particular issues were raised late in the review.

Late correspondence impacted client	<ul style="list-style-type: none">• Use this tag when you have received a file after its due date (according to the eFiles system) and this had a significant negative impact on the client.• DO NOT use this tag because you asked for a rush but only received a response on the eFiles due date. Consider the ARO system for reviews that require a tight turnaround.• The ticket must identify when the due date was and when the response was received (in the “Comments” field).
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