Tech Design Spec – Filing Concierge

Product: CBAM Filing Concierge (Full-Service Filing Coordination & Audit ZIP Assembly)

Version: v1.0

Prepared By: Filentra Founder

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1. PURPOSE

CBAM Filing Concierge is a premium, white-glove service that handles the full process of supplier data collection, audit validation, fallback justification, XML generation, and registry upload coordination—without violating the EC rule prohibiting third-party filing. It is an orchestrated system that combines Filentra engines, outreach agents, and human freelancers to hand back a submission-ready ZIP file for declarants.

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2. INPUT STRUCTURE

Client-facing intake (via dashboard form or email):

- Declarant EORI

- Filing Quarter + Year

- Supplier list (Name, Email, CN Code, Country)

- Registry login delegation (optional; freelancer use only)

- Any past reports or registry data

Accepted Formats:

- XLS, JSON, Registry screenshots

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3. OUTPUT STRUCTURE

ZIP Bundle for Declarant:

- cbam\_report.xml

- cbam\_audit.pdf

- default\_memo.pdf (if fallback triggered)

- supplier\_effort\_log.pdf

- contact\_log.csv

- registry\_checklist.pdf

- README.md (manifest of contents, timestamp, checksum)

Filename Convention:

CBAM\_CONCIERGE\_BUNDLE\_{EORI}\_{YYYY}\_Q{N}\_v1.zip

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4. FUNCTIONAL MODULES

4.1 Intake & Ticketing Engine

- Triggered on Stripe checkout (Concierge SKU)

- Sends intake form link (dashboard/email)

- Generates internal ticket ID

- Tracks metadata (EORI, supplier count, fallback flag, freelancer assigned)

4.2 Supplier Collection Engine

- Uses Supplier AI Agent or freelancer coordination

- Translated emails + GDPR-formatted templates

- 5-day chase window

- 20 supplier cap (+€500 per 5 thereafter)

- All interactions logged in metadata format only

4.3 Default Audit & QC Module

- Uses Default Audit Engine on collected data

- Flags >20% fallback, outliers, verifier gaps

- Prepares fallback memo and audit PDF

- Memo in markdown → PDF

4.4 Risk Vault Assembler

- Pulls XML, audit, memo, logs, fallback logs

- Adds checklist and registry notes

- SHA256 ZIP hashing

- Compliance manifest injected into README.md

4.5 Registry Coordination Layer

- Assigns EU-based freelancer with eID

- Freelancer logs in to registry (delegation)

- Validates XML structure, flags issues (installation mismatch, ID missing)

- Shares files with declarant before submission

- No submission done by Filentra

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5. NON-FUNCTIONAL REQUIREMENTS

- GDPR Storage: auto-delete within 30 days

- ZIP hosted in EU zone S3/Supabase

- Email response SLA <24h

- Manual fallback allowed for AI agent

- ZIP ready in 5–7 business days

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6. EDGE CASES

- More than 20 suppliers: trigger add-on logic

- Supplier unresponsive → fallback memo triggered

- Registry login not possible → declarant uploads

- Verifier field empty → memo + flag

- Declarant ghosting → auto-archive ticket after 10d inactivity

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7. API ENDPOINTS (INTERNAL)

- POST /concierge/intake

- GET /concierge/status/{ticket\_id}

- POST /concierge/assign\_freelancer

- GET /concierge/download/{eori}/{quarter}

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8. ANALYTICS & EVENTS

Events:

- concierge\_checkout

- concierge\_form\_submitted

- concierge\_supplier\_chase\_started

- concierge\_zip\_generated

- registry\_login\_confirmed

- concierge\_bundle\_downloaded

Tool: PostHog or GA4

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9. STORAGE & SECURITY

- EU-only S3 storage

- ZIP locked after generation (unless retry triggered)

- Supplier metadata = GDPR basis “legitimate interest”

- PII never stored post 30d

- Access logged + monitored

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10. DEPENDENCIES

- CBAM Express Fix

- Supplier AI Agent or Freelancer Ops

- Default Audit Engine

- Risk Vault Engine

- UploadThing (file handoff)

- Stripe SKU trigger

- Supabase or EU-S3 bucket

- Calendly embed for scheduling support call

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11. OWNER

- Product Owner: Filentra Founder

- Legal: Approved under CBAM non-filer constraint

- Ops: Freelancer network management

- QA: Concierge ZIP checklist pending