

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 17-04

REGULATORY REFORM INITIATIVE

COMMENTS OF

FLORIDA CUSTOMS BROKERS & FREIGHT FORWARDERS ASSOCIATION, INC

As members of the NCBFAA, we fully support the efforts of the Association to reduce or outright eliminate burdensome and unnecessary regulations affecting our membership. There are three main regulatory activities we support a full reform of. These include:

- NVOCCs should be entirely exempted from having to publish rate tariffs
- If the repeal of rate publication will not be considered, for NRAs, the exemption should be broadened to eliminate the restriction on amending them; restrictions on including economic terms such as credit, minimum quantities, liquidated damages, etc.; and the need for a written acceptance of NRA's. Acceptance and booking of cargo should suffice as acceptance of the rate.
- The existing requirement for NVOCCs to file NSAs with the Commission or to publish essential terms of NSAs in their tariffs should be repealed as this process is extremely cumbersome and is not used by the trade in day to day business as it does not keep pace with trade in the international marketplace

Dated: July 3, 2017

Signed: 

Name/Title:
Barbara Pimentel
Executive Vice President/Director