



A member of the *KWE* Group

October 31, 2019

Federal Maritime Commission
800 North Capitol Street NW
Washington, DC 20573-0001

Attention: Rachel E. Dickon

RE: Docket 19-05, Demurrage and Detention Comments

Dear Assistant Secretary Dickon,

APL Logistics requests clarification from the Federal Maritime Commission (“FMC”) related to the proposed interpretive rule addressing demurrage and detention under the Shipping Act. APL Logistics is an ocean transportation intermediary, a freight forwarder, and a non-vessel owning common carrier. The breadth of APL Logistics’ services makes a clear understanding of the proposed interpretive rule of critical importance.

Specifically, APL Logistics seeks clarification whether the proposed interpretive rule applies to railroad terminals when an international shipment passes through a marine terminal operator and is then transported to its final destination via rail on a through bill of lading.

APL Logistics appreciates the opportunity to comment on the proposed interpretive rule and looks forward to the FMC’s guidance on the request for clarification above.

Respectfully,

Marina Radcliffe
Regional Trade Compliance
APL Logistics Americas, Ltd.

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