

From: [Richard Jung](#)
To: [Secretary](#)
Subject: Docket 19-05, Demurrage & Detention Comments
Date: Thursday, September 19, 2019 3:10:19 PM

On behalf of the transportation community- thank you for taking a closer look at the issues surrounding detention and demurrage application and invoicing.

One point I would like considered is a defined invoicing period. My company has suffered two incidents in the last year where detention invoices we received six months after incursion. After a six month period it is difficult for us to collect this money and we end up having to take a loss. If I had my way- carriers would have to waive any invoices that were not sent out within three months of gate it.

Thank you for your consideration.

With warm regards,

Richard Jung

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