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October 31, 2019

Rachel E. Dickon, Secretary
Federal Maritime Commission
800 North Capitol Street, NW
Washington, DC 20573-0001

Re: Docket 19-05, Demurrage and Detention Comments

Dear Ms. Dickon,

We thank the Federal Maritime Commission for listening to the trade in regard to the grossly antiquated, unfair, and silly practices that surround both detention and demurrage in today's world. We ask for one thing and one thing alone, that common sense be driven into these processes.

For example, if freight is not available to be picked up, demurrage should not be accruing. The clock on demurrage should start when the freight is made available. Days where freight cannot be picked-up, such as weekends, holidays, or unexpected shut downs should not count.

The same common sense practice should be implemented for detention. If we cannot return a container because the terminal will not take it, detention should not accrue. It should also not accrue on days where the freight cannot be picked-up such as weekends, holidays or unexpected shut downs.

A notice of cargo availability with date and time would solve these issues. Detention may be more difficult to solve, but could use the same concept. Invoices for either charge should include sufficient back up that is detailed with dates, time, etc.

Members of the trade should not have to prove they don't owe money for either detention or demurrage. The entity billing the fees should prove they are owed, as it is with any other business on Earth. When disputes arise a common sense process for resolution of the process should be posted so the trade understands how to handle the

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problem. In today's world we generally have to pay now and hope we can do something later or the money amount keeps increasing.

We ask that the entities who invoice these charges simply implement fair, common sense, documented processes that are fair to all parties involved.

We thank the Commission for their consideration of these difficult and costly issues.

Sincerely,

Matthew J. Parrott

A.N. Deringer, Inc.