



October 31, 2019

Federal Maritime Commission
Rachel Dickon
Commission Secretary
Secretary@fmc.gov

Re: SUPPORT: Interpretive Rule on Detention and Demurrage under the Shipping Act

Honorable Commissioners:

On behalf of National Retail Systems, we want to thank the Commission for addressing these very important issues impacting the trucking industry and the import community we represent. Not all encompassing, however, these critical issues have a tremendous impact on the supply chain and the timely flow of cargo expected of the transportation community. Our mission is meeting the expectations of the importers in draying, deconsolidating and consolidating their cargo and timely deliveries on the final mile to the consumer. The costs associated with these issues are not reasonable or economically justified. We appreciate the anticipated support of the Federal Maritime Commission in resolving our concerns. They are as follows:

Free time to be extended on import cargo when terminals are congested and unable to deliver containers within a reasonable time frame to be established.*

*KPI's for terminal operators to be agreed upon with the import community (drayage) terminal operators.


Additional free time to be granted when empty containers are required to be delivered to a secondary location from where the imports were picked up and compensation when required

Rates for demurrage and per diem must be reasonable and financially justified by the carriers and terminal operators

Charging per diem when the terminals and lines will not accept empties is unfair

Thank you.

Sincerely,


Steve Schulein
VP Drayage and Industry Relations

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