

From: [Jerry Dooley](#)
To: [Secretary](#)
Subject: demurrage & detention comments
Date: Thursday, October 31, 2019 1:53:35 PM

Good Afternoon,

I have been working for our company since 1984 serving the port of NY - NJ., I have many concerns with the delays and excessive charges that are passed on to us and our customers. We are a third generation company that started in 1947. Some of these issues have made it hard to operate at a profit, recruit new drivers and to keep our customers coming to our port.

Below are some of my concerns:

Free time should be extended on all cargo at a terminal when service levels (turn times/congestion) fall below an acceptable level.

Cargo flow cannot be blamed on BCO's or truckers if terminals cannot deliver efficiently.

Free time should not begin until cargo is cleared by all government agencies. Charging demurrage and applying free time when cargo cannot be picked up does not expedite cargo flow.

Free time should be extended or billed to ocean carriers not truckers when equipment such as gensets are not available at terminal.

Free time should be extended if we can not make appointments to pick up or return.

Per diem should be extended when empties cannot be returned to place of pickup. Extra time should be allowed when diverted to other locations or when appointment for return is required.

We should have the right to refuse terminations if an acceptable rate is not agreed upon without causing delay in returning the empty.

Rates for demurrage and per diem should be reasonable and economically justified by actual cost from terminal and ocean carrier. 30 years ago per diem increase were justified that the chassis needed to get back to the terminal. Most lines are out of the chassis business.

Why are customers billed for 3 days on demurrage if last free day is Friday and can not pick up container until Monday the first available day to pick up container?

Street turn fees done electronically with a program or via email to a clerk are charged as much as what lines want to pay motor carries to terminate the box. Isn't a street turn helping to reduce our carbon footprint in the port and saving the steamship line money on terminal handling charges?

Empty depot hours of operation should match terminals.

Customer service at the steamship lines should match the hours of operation of the terminals. Too many times our drivers are waiting a few hours for a rep to report to work to solve simple problems.

All demurrage payments should be made to the terminal that will issue the container. There should not be a payment requested to the terminal and the line. Multiple payments delay the movement of the cargo.

If a container is discharged after 9 am, that day should not count as a free day.

Regards,

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President



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