



**April 3, 2020**

**The Honorable Michael Khouri  
Chairman  
Federal Maritime Commission  
800 North Capitol Street N.W.  
Washington, DC 20573**

Dear Chairman Khouri:

On behalf of Under Armour, I am writing urge the Federal Maritime Commission (FMC) to immediately finalize, as published, the FMC's Proposed Interpretive Rule addressing fair demurrage and detention practices at our nation's maritime gateways. In light of the current crisis, I urge the FMC to issue strong guidance stating that, based on the final interpretive rule, the current crisis constitutes a situation where detention and demurrage fees should be waived.

By way of background, Under Armour is a Baltimore-based company that provides innovative products and experiences to help advance human performance, making all athletes better. Our company is a leading inventor, marketer, and distributor of branded athletic performance apparel, footwear, and accessories. Under Armour employs 1,200 teammates in our Distribution Houses in Maryland, California, and Tennessee and 14,000 teammates globally, with a vast majority of those living and working in the United States.

Like many U.S. businesses, Under Armour is facing supply chain disruptions resulting from the coronavirus – from lockdowns in supplier countries and shipping issues to the shutdown of retail in the United States. As such, equipment cannot be returned or containers cannot be picked up during the free period for reasons beyond my company's control, especially in this time of crisis. Under Armour believes that the approach that the FMC has developed with the Proposed Interpretive Rule, which provides guidance for when a detention or demurrage charge can or cannot be fairly imposed, is the correct one.

Again, I urge the FMC to immediately adopt its proposed interpretive rule, as published. The FMC has created a strong rule, and it needs to be implemented now more than ever.

Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig Jones', written over a white background.

Craig Jones  
SVP, Global Logistics and Regional Distribution  
Under Armour, Inc.

CC: Commissioner Rebecca Dye  
Commissioner Daniel Maffei  
Commissioner Louis Sola  
Commissioner Carl Bentzel