

**From:** [Customer Service](#)  
**To:** [Secretary](#)  
**Subject:** Docket 19-05, Demurrage & Detention Comments  
**Date:** Thursday, October 17, 2019 5:17:10 PM  
**Attachments:** [ami.png](#)

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Our company works almost exclusively with refrigerated containers on which Free Time before demurrage is only 2 days in the US, 4 days for return empty container.

**Cargo Availability:**

- issues with Time container discharged at vs. reality of when driver can be notified and can get into port to pick up (ie.hours of operation at the port) - eg. if container only discharged at midnight on Wednesday, difficult to get driver in on Thursday to pull and must pull on Friday to avoid demurrage

**Empty Container Return:**

- cannot return empty container if port is closed yet per diem fees levied regardless - that is if LFD for detention is on a Friday, per diem charged Saturday and Sunday even though port is closed  
- shipping line should extend the free time if give me free time if importer have volume, not only the standard free time of 2 working days.

**Notice of Cargo Availability:**

- shipping line actually has been doing quite well now as technology improves, unlike old date only fax was the only way to notify importer for cargo availability

**Government Inspections:**

- (government) agency is holding the cargo, extra free time and detention should be granted - outside of the control of the importer

Demurrage and Detention policies: clear - as long as information is available on the arrival notice

Transparent Terminology: clear; as long as dates are clearly defined

Sincerely,

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