

Commentator's Name: Jose Lamas  
Commentator's Email: jlamas@weberlogistics.com  
Commentator's Company and Title: Weber Distribution LLC., Director of Transportation

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Q: Should the Commission include both VOCCs (Vessel Operating Common Carrier) and NVOCCs in a proposed regulation on demurrage and detention billing?

A: No

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Q: Should the Commission include MTOs (Marine Terminal Operators) in a proposed demurrage billing regulation?

A: Yes

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Q: Should a proposed demurrage billing regulation distinguish between the demurrage MTOs charge to shippers and the demurrage MTOs charge to VOCCs?

A: Yes

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Q: What percentage of demurrage and detention bills contain inaccurate information?

A: 10%-20%

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Q: Which information is most often disputed?

A: Days billed, the weekend days billed situation is very confusing and is often times manipulated by big SSL's. Also, we shouldn't be billed for weekends.

Correct, the terminal empty restrictions, but definitely something to look into to!

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Q: How much does the type of information included on or with demurrage and detention billings vary among common carriers, among marine terminal operators, and between VOCCs and NVOCCs?

A: Plenty enough to where the teams are bringing up standardization

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Q: What type of information should be required on billings. Should the Commission require certain essential information included on invoices such as:

A:

Bill of lading number: Yes

Container number: Yes

Billing date: Yes

Payment due date: Yes

Start/end of free time: Yes

Start/end of demurrage/detention/per diem clock: Yes

Demurrage/detention/per diem rate schedule: Yes

Location of the notice of the charge: Yes, we need standardization!

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Q: For import shipments, Should the invoicing include:

A:

Vessel arrival date: Yes

Container availability date: No

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Q: For export shipments, Should the invoicing include:

A: Earliest return date, including identifying any modifications to the earliest return date: Yes

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Q: Any intervening clock-stopping events, for example:

A:

Unavailability of container: Yes

Unavailability of pickup or return locations: Yes

Unavailability of appointments (where applicable): Yes

Restrictions on chassis accepted: Yes

Force majeure-related events: Yes

Is any portion of the charge is a pass-through of charges levied by the MTO or Port? No

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Q: What information or timeframes should be required for VOCC and NVOCC demurrage and detention bills? Should the Commission require different types of information or timeframes?

A: No

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Q: Do common carriers invoice multiple parties for demurrage and/or detention charges?

A: Focus on either the carrier (trucker) or the customers freight forwarder

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Q: Should the billing party be required to identify the basis of why the invoiced party is the proper party in interest and therefore liable for the charges?

A: Yes!

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Q: Should the Commission, for purposes of clarity and visibility of charges, require MTOs to bill demurrage directly to shippers (rather than billing VOCCs who then bill shippers for demurrage)?

A: Yes bill the shippers

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Q: How long from the point of accrual of a demurrage or detention charge does it typically take to receive a demurrage or detention invoice or billing?

A: 3-6 months

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Q: Should the Commission require demurrage and detention invoices to be issued within 60 days of date when the detention/demurrage/per diem stops accruing?

A: Yes

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Q: (If no) Please provide number of preferred days:

A: 60 Days

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Q: Should the Commission require specific information be included on the invoice regarding how to dispute a charge? If so, what information should be required?

A: Yes, standardization of disputes! Its all over the place

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Q: How long from the point of dismissal of a charge does it typically take to receive a refund?

A: 1-2 weeks

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Q: How would a regulation on demurrage and detention billing requirements impact, conflict with, or preempt any other applicable laws, regulations, or arrangements such as the UIIA (Uniform Intermodal Interchange and Facilities Access Agreement)?

A: It would not, as long as the demurrage and detention are accurate we would not have such a back and forth between carriers and SSL's

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Q: Please provide any other views or data you believe would help inform the Commission's decision whether to pursue a proposed regulation on demurrage and detention billing information and practices.

A: Standardization!