



Docket No. 22-04, Comments on Demurrage and Detention Billing Requirements ANPRM

The demurrage & detention charges in 2020 & 2021 were entirely unfair and unreasonable. They are most often beyond our control as importers.

Generally, the delays are caused by Container Yards being full, slow or closed. Container Yards quite often do not give booking confirmations for day/s, making it impossible to return empties on time. How can the Importer be at fault for these instances?

I strongly suggest that more consideration is taken, and changes made to these rules. We simply cannot afford to these risks with the unknown of delays at Ports and container yards

Daniel Newport

Manger at Pinnacle Fresh

April 7th, 2022

A handwritten signature in black ink, appearing to read "Daniel Newport".