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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: Yes

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

A: Yes

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

A: Yes

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

A: Over 25%

Q: Which information is most often disputed?

A: Availability of container pickup

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: 50%

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: Everywhere

Q: For import shipments, Should the invoicing include:

A:

Vessel arrival date: Yes
Container availability date: Yes

Q: For export shipments, Should the invoicing include:

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

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? Yes

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

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

A: Yes. Absolutely

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: Absolutely

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

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: 30 days

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

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

A: 10 Days

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. All of the above

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

A: 10 days

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:

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: