

March 3, 2022

The Honorable Chairman Daniel B. Maffei  
Federal Maritime Commission  
800 North Capitol Street, N.W.  
Washington, DC 20573

Dear Chairman Maffei:

The undersigned associations submit this letter to respectfully request that the Federal Maritime Commission (FMC) extend the public comment period on its Advance Notice of Proposed Rulemaking (ANPRM) regarding demurrage and detention billing practices issued on February 15, 2022.<sup>1</sup> Comments on the ANPRM are currently due on March 17, 2022, but we would greatly appreciate a 30-day extension. Our associations are in the process of surveying respective member companies to gather their experiences and document them in a manner that is most helpful to the FMC.

A 30-day extension would facilitate our respective efforts and would be consistent with the FMC's goal to collect information regarding the impact of demurrage and detention billing practices on the trade.

Thank you for your consideration, and we look forward to continuing to work with the Biden-Harris Administration to ensure freight fluidity and bolster the U.S. innovation economy.

Sincerely,

Agriculture Transportation Coalition – AgTC  
American Apparel & Footwear Association (AAFA)  
American Association of Exporters and Importers (AAEI)  
American Chemistry Council (ACC)  
American Forest & Paper Association (AF&PA)  
Association of Food Industries  
Auto Care Association  
Can Manufacturers Institute  
CAWA - Representing the Automotive Parts Industry  
Color Pigments Manufacturers Association  
Consumer Brands Association  
Consumer Technology Association (CTA)

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<sup>1</sup> 87 Fed. Reg. 8,506 (Feb. 15, 2022).

Fashion Accessories Shipper Association  
The Fashion Jewelry and Accessories Trade Association  
The Foreign Trade Association  
Gemini Shippers Association  
Global Cold Chain Alliance  
Halloween Industry Association, Inc.  
Hardwood Federation  
Harbor Trucking Association  
Home Fashion Products Association  
Home Furnishings Association (NAHFA)  
Institute of Scrap Recycling Industries, Inc. (ISRI)  
International Association of Movers (IAM)  
International Warehouse Logistics Association  
International Wood Products Association  
Juvenile Products Manufacturers Association ~ JPMA  
Leather and Hide Council of America  
Meat Import Council of America  
Motor & Equipment Manufacturers Association (MEMA)  
National Customs Brokers & Forwarders Association of America, Inc. (NCBFAA)  
National Fisheries Institute (NFI)  
National Industrial Transportation League (NITL)  
National Pork Producers Council  
National Retail Federation (NRF)  
National Sporting Goods Association  
North American Association of Food Equipment Manufacturers (NAFEM)  
North American Meat Institute  
Pacific Coast Council of Customs Brokers and Freight Forwarders – PCC  
Promotional Products Association International (PPAI)  
Retail Industry Leaders Association (RILA)  
Sports & Fitness Industry Association  
The Toy Association  
Travel Goods Association (TGA)

Cc: Commissioner Rebecca Dye, Commissioner Carl Bentzel, Commissioner Luis Sola,  
Commissioner Max Vekich, and John DeCrosta