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April 15, 2022

VIA EMAIL (secretary@fmc.gov)

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

RE: FMC Docket No. 22-04
Advanced Notice of Proposed Rulemaking
Demurrage and Detention Billing Procedures

Dear Chairman Maffei:

This law firm represents the Port of NY/NJ Sustainable Services Agreement (PONYNJSSA), FMC. (F.M.C. Agreement No. 201175). The members of the PONYNJSSA I are marine terminal operators (MTOs) doing business in the Port of New York and New Jersey. The purpose of the PONYNJSSA is to permit its members to meet, discuss and agree on matters that relate to promoting environmentally sensitive, efficient, and secure marine terminal operations in the Port. The members of the PONYNJSSA are the six container terminal operators in the Port including APM Terminals Elizabeth, LLC, GCT Bayonne LP, GCT New York LP, Maher Terminals, LLC, Port Newark Container Terminal LLC, and Red Hook Container Terminal, LLC.

The members of the PONYNJSSA have reviewed the comments submitted by the National Association of Waterfront Employers (NAWE) dated March 18, 2022 and submit this letter to the above-referenced docket in support of the comments submitted by NAWE as if those comments were fully restated herein.

The PONYNJSSA thanks the FMC for engaging in a public process and giving careful consideration to the structure and content of a potential demurrage and detention rulemaking. As always, we look forward to continued engagement with the agency throughout this process and welcome your questions on this matter.

Respectfully submitted,

THE LAMBOS FIRM, LLP

/s/Carol N. Lambos

By: _____
Carol N. Lambos