

**From:** [Sherrie C. Smith](#)  
**To:** [Secretary](#)  
**Cc:** [William Cody](#)  
**Subject:** Docket No. 22-04, Comments on Demurrage and Detention Billing Requirements ANPRM  
**Date:** Wednesday, September 28, 2022 2:53:27 PM  
**Attachments:** [image001.png](#)  
[SPR08OF2122092812090.pdf](#)

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Dear Secretary,

Attached is an example of a per diem invoice sent to me today, 9-15-22 that the actual incident happened back in May of 2021. (see third page of invoice attachment)

To go back and try to research this information after sixteen months have passed is a laborious task.

There should definitely be a time limit of no more than 30 days on per diem or demurrage invoices from carrier to consignee, as the information will be current and easily researched and disputed if need be.

But it's my belief, that they know than rather spend time investigating every one of these (I have received 13 of these today from my freight forwarder) that we will most likely just approve for payment.

Please make this proposal to limit the time a carrier can issue per diem or demurrage invoices a RULE.

Thank you,  
Sherrie Smith

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