

TO: Federal Maritime Commission, sent via email to [secretary@fmc.gov](mailto:secretary@fmc.gov)

FROM: New Haven Transport LLC

RE: Docket No. 22-19, Request for Information

I am writing to share my feedback on Docket No. 22-19, which seeks comment on whether supply chain congestion has created conditions warranting the issuance of an emergency order requiring common carriers and marine terminal operators (MTOs) to share key information with shippers, truckers, and railroads.

Based on my experience as a motor carrier moving freight at the Port of NY/NJ, I strongly support the issuance of an emergency order. The lack of adequate information sharing has created an emergency situation that is adversely affecting our operations, impeding the efficient movement of freight. An emergency order issued by the Commission would help alleviate this situation.

I believe the scope of this emergency order should include (but not necessarily be limited to) the following:

- Marine Terminals that require appointments for movement of freight must clearly indicate the number of appointments available for each type of move (specific to time slot, SSL, and container size), and must notify shippers, motor carriers and ocean carriers when those appointment slots are fully booked/no longer available.
- When a location is designated as an Empty Container Return location, notice must be given on the total number of containers being accepted (specific to SSL and container size). If capacity is reached before the end of the day and empties are shutout by the terminal, notice must be sent to shippers, ocean carriers and motor carriers, documenting the lack of available return location.
- If a Marine Terminal Operator places restrictions on the free flow of Empty Container Returns (e.g. requiring double moves only, restricting returns for a specific SSL to certain time windows, etc.), Shippers, Ocean Carriers and Motor Carriers must be notified of these restrictions, as they may adversely affect the motor carriers' ability to return the container.
- When on-street congestion and/or extreme traffic conditions warrant temporary closure of access to the terminal, notification must be sent to Shippers, Ocean Carriers and Motor Carriers, including time stamps of when the metering commenced, and when free flow into the terminal resumed. Port law enforcement agencies and port operations personnel may assist in this notification process as warranted.
- When system issues adversely affect a terminal's ability to process trucks, notification must be sent to Shippers, Ocean Carriers and Motor Carriers, including time stamps indicating when the system issue commenced, and when the issue was resolved.

As our company is located 100+ miles from the piers our major problem is when there are **"No Return Locations"** for days at a time sometimes weeks we bring them to New Jersey store them in a secure parking lot which we are billed for and we also are billed for chassis'. By doing this we can have drivers return them as soon as they accept them.

Also, there is a major problem trying to retrieve chassis to pick up containers sometimes our drivers are in Chassis Depot for six (6) to eight (8) hours and are turned away because there are no chassis' being returned, this is an expense for the company as we have to pay the drivers to wait they are not going to do this for free.

Please keep in mind the **Per Diem** we are being told will be waived but if you receive an invoice you have to dispute it. This we find extremely unfair as they already know what days they were not receiving containers it would be very easy for them to **"NOT"** produce invoices.

Ronald Esposito  
New Haven Transport LLC  
PO Box 8572  
New Haven, CT 06531  
Phone 203-909-6510  
Fax 203-909-6511  
Cell 203-675-0564  
Email [ronnieespo@comcast.net](mailto:ronnieespo@comcast.net)