



**BEST
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August 15, 2022

Federal Maritime Commission
800 North Capitol Street NW
Washington, DC 20573

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

Thank you for your work on OSRA 2022. We believe this is an important step but more work needs to be done.

In regard to Docket No. 22-19, Request for Information, we do believe the congestion of the carriage of goods has created an emergency situation such that there exists a substantial, adverse effect on the competitiveness and reliability of the international ocean transportation system. Reliability has never been lower. It is nearly impossible for shippers to plan when vessels are constantly late and cargo is delayed at marine terminals.

In response to OSRA 2022, we have seen Ocean Carriers and Marine Terminals reduce the information provided to stakeholders such as Last Free Day information for imports and First Return/Vessel Cutoff information for exports. This data has always been provided. Before the days of the internet, we would have to call the terminals to get this information. With the internet, these basic data points were common for every Marine Terminal. However, in the past two months since the passage of OSRA 2022, some Carriers and Terminals have removed this information and demanded payment for charges that were unavoidable because the information was not available.

An emergency order requiring Ocean Carriers and Marine Terminals to not only share basic container availability information and charges is warranted. This information should be posted on their websites for easy access for all stakeholders. It should not require multiple emails and/or phone calls to customer service centers that do not respond within days. The industry cannot work like that.

Sincerely,

Cory Peters
Chief Financial Officer