



International Express Trucking, Inc

Federal Maritime Commission
800 North Capitol Street, N.W
Washington, DC 20423

September 16, 2022

Dear Chairman Maffei:

The FMC mission statement is to ensure a competitive and reliable international ocean transportation supply system that supports the U.S economy and protects the public from unfair and deceptive practice. Further, The Ocean Shipping Reform Act of 2022 Sec 2. PURPOSES (2) to ensure an efficient, competitive, and economical transportation system in the ocean commerce of the United States.

We are presenting and substantiating beyond doubt unreasonable and deceptive practices under the Shipping Act, parts 41102 (c) and 40015 (14), (15), (15) (A), and 15 (B), for handling, storing and delivering property and the improper assessment of charges for international equipment moving on a through ocean bill of lading. We also refer to 441105 (2) a conference or group of two or more common carriers may not engage in conduct that unreasonably restricts the use of intermodal services (chassis use restrictions).

We strongly claim the FMC has jurisdiction over any ocean through bill of ladings to inland points. The container is moving under a U.S. Customs bond and the ocean bill of lading is issued to an inland destination. Finally, the rail is contracted for inland movement by the ocean carrier. Bottom line: If the steamship line is controlling the inland movement, then the FMC has jurisdiction. We have clearly outlined in detail conditions at inland ports that demonstrate unreasonable business practices.

In the following exhibits we present evidence that there is absolutely no flexibility or accountability from the steamship lines, chassis providers or rails to help streamline the international supply chain. The steamship lines and rails have reported record profits while the shipper has paid absurd rail detention and demurrage due to rail inefficiencies and steamship lines dictating rail locations and chassis restrictions by ocean carriers. These are unfair, unreasonable, deceptive business practices.

The economic impact on the international shipping community is substantial. Shippers are paying extraordinary detention and demurrage, not to mention they cannot have access to their goods. This delay of container availability creates inventory issues and a loss of sales. In addition, it generates a greater possibility of obsolescence inventory on seasonal products. All these issues contribute to higher priced goods for the consumer which is critical in a recessionary period due to unfair, unreasonable, deceptive practices.

The inefficiencies of the international ocean transportation supply system have created a competitive situation for intermodal truck drivers. Drivers are leaving intermodal driving due to the inability to earn a fair wage. The drivers are regulated by DOT and hours of service mandates. The long dwell times at the rails impedes their ability to earn an income to support their families due to unfair, unreasonable, deceptive business practices.

Pursuant to OSRA 22 Sec 18, Temporary Emergency Authority, IXT is requesting the FMC to implement temporary emergency authority over all inland ocean container movements and chassis restrictions. We feel strongly we have substantiated an emergency situation of a magnitude such that there exists a substantial adverse effect on the competitiveness and reliability of the international ocean transportation supply system due to unfair and deceptive practices. Please find in the following exhibits all documents pertaining to the issues we are facing in Kansas City and we feel confident you will agree that the international ocean transportation supply system is not efficient, competitive, or economically feasible. Look forward to working together to find a solution.

Sincerely,

A handwritten signature in black ink, appearing to be 'Karen Duff', written over a white rectangular area.

Karen Duff, CEO/President/Owner
International Express Trucking, Inc.

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