



November 19, 2018

To Whom it May Concern:

*Frankford Candy has been in business for more than 70 years and in that time we have seen many changes. Having begun primarily as a manufacturer of chocolate, today much of our product is imported from an off-shore location. That being the case, we are heavily reliant on the global ocean transportation industry and all those who supply very important primary and ancillary services to us. We depend on reliable supply-chains that we have worked for many years to set up, maintain and improve wherever possible in order to continue to maintain and grow both our brand and our market share in a very competitive environment.*

*Since the introduction of confidential service contracts, we have appreciated and relied on the Federal Maritime Commission to provide our company with guidance, oversight and protection in particular as it relates to the actions of the ocean carrier industry sector. The role that the FMC has played in the oversight of service contracts has served us well and we believe that the changes being proposed by the World Shipping Council in their petition will have an adverse effect on our business.*

*Like many businesses, we need some level of "cost certainty". Without the role that the FMC plays today, we fear we could well be subject to the introduction of extra (perhaps arbitrary) charges which would result in additional costs and leave us with no viable way to dispute or negotiate alternatives. We have seen and been made aware of these kinds of actions in the past.*

*For that reason (and others) we are opposed to the changes as outlined in the petition.*

*Perhaps an alternative approach could be the establishment of a committee made up of "stakeholders" from all sides which could review and make recommendations providing more data.*

*We appreciate the opportunity to voice our concerns over this important area and look forward to additional information as available.*

*Sincerely,*

A handwritten signature in black ink that reads "Sandra A. Burr". The signature is written in a cursive style.

Sandra A. Burr  
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