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CALIFORNIA CARTAGE EXPRESS, LLC

February 14, 2017

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

Ms. Rachel E. Dickon, Assistant Secretary
Federal Maritime Commission
800 North Capitol Street N.W.
Washington, DC 20573-0001

RE: Petition of the Coalition for Fair Port Practices for Rulemaking [Petition No. P4-16]

Dear Assistant Secretary Dickon:

I am writing in response to FMC's notice published on December 28, 2016 concerning a petition for rulemaking from the Coalition for Fair Port Practices. California Cartage Express, LLC which is the company I represent fully supports the policy statement requested by the Coalition which would help bring about more reasonable demurrage and detention practices for cargo moving to and from all ports on the west coast and the southeast. I am urging the FMC to begin a formal rulemaking process on this matter as soon as possible.

I am the President of California Cartage Express, LLC with headquarters in Long Beach California. We have operations up and down the Pacific Coast at the Ports of Seattle, Oakland, Long Beach, Los Angeles, and San Diego. We also have operations in the Southeast at the Ports of Norfolk, Savannah, Charleston, Wilmington, Jacksonville, and Houston. Our company has approximately 700 owner-operators moving cargo to and from the ports I have listed.

Over the past several years our company has been subjected to hundreds of thousands of dollars of demurrage bills issued by the various steamship terminals for cargo that we were forced to pick up after the free-time had expired. In nearly every case we attempted to pick up the cargo during the free-time and for any number of reasons not related to our operations we were not permitted to pick up the cargo. Demurrage is assessed when cargo is not picked up during free time. In most cases we have the ability and want to pick up the cargo as soon as it's available. However, terminal congestion and terminal inefficiencies create situations where truckers cannot pick up the cargo in a timely manner. Port delays are mostly caused by the inefficiencies of the terminals to move the larger volumes of cargo through their facilities. The trucking industry needs the terminals to take responsibility for their inefficiencies and not burden the trucking industry with unfair demurrage and detention charges. We urge you to bring this matter to a formal hearing.

Very truly yours,

Robert A. Curry
President

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