

December 8, 2017

PUBLIC DOCUMENT

VIA FEDEX DELIVERY AND EMAIL TO SECRETARY@FMC.GOV

Ms. Rachel E. Dickon
Assistant Secretary
Federal Maritime Commission
800 North Capitol Street N.W., Room 1046
Washington, DC 20573-0001

Re: **Petition of the Coalition for Fair Port Practices for Rulemaking – Petition No. P4-16
Request to Appear and Present Testimony at the Hearing**

Dear Assistant Secretary Dickon:

The Auto Care Association requests the opportunity to present testimony at the Federal Maritime Commission's January 16 and 17, 2018 public hearing on the Petition of the Coalition for Fair Port Practices for Rulemaking (P4-16).¹ Steven Hughes, President/CEO of HCS International, is a member company and will be presenting testimony at the hearing on behalf of the Auto Care Association. Hughes has been in the automotive aftermarket industry for over 40 years and met with the Commissioners and the Chairman in June of 2015 as part of the automotive industry delegation expressing concern about the unfair application of demurrage and detention.

Based in Bethesda, Md., the Auto Care Association has nearly 3,000 member companies that represent some 150,000 independent automotive businesses that manufacture, distribute and sell motor vehicle parts, accessories, tools, equipment, materials and supplies, and perform vehicle service and repair.

Auto Care Association members have reported repeated incidents of disruption in port operations and severe congestion at container terminals in U.S. ports on both the West Coast and East Coast. These disruptions have prevented our members from picking up cargo or returning empty containers without being charged demurrage and detention penalties. Our members further have reported interruptions in global supply chains across the economy, causing significant and widespread delays in the flow of imports and exports, and the need to expend additional resources to find solutions to the disruption.

As indicated in our comments², we fully support the policy statement requested by the Coalition for Fair Port Practices, which would help bring about more reasonable demurrage and detention practices for

¹ *Petition of the Coalition for Fair Port Practices for Rulemaking; Notice of Public Hearing and Request for Comments*, 82 Fed. Reg. 55104 (Nov. 20, 2017).

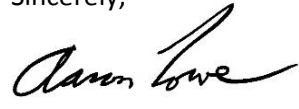
² Auto Care Association Comments to the Federal Maritime Commission regarding *Petition of the Coalition for Fair Port Practices for Rulemaking – Petition No. P4-17* (Feb. 21, 2017).

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cargo moving through our nation's seaports, and would very much appreciate the opportunity to present testimony before the Commission during the hearings on Jan. 16 and 17, 2018.

Please contact Angela Chiang, director, international affairs, at 301-654-6664 or via email at angela.chiang@autocare.org if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink that reads "Aaron Lowe". The signature is written in a cursive style with a horizontal line underneath it.

Aaron Lowe
Senior Vice President, Regulatory and Government Affairs
Auto Care Association