December 8, 2017

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

By email: secretary@FMC.gov

Re: <u>Petition No. P4-16</u>; Petition of the Coalition for Fair Port Practices for Rulemaking; Statement of

Intent to Testify of Howard Finkel, COSCO

Dear Ms. Dickon:

With reference to the Commission's November 16, 2017, notice scheduling a public hearing in Petition P4-16 on January 16 and 17, 2018, please accept this notice of intent to testify. I am Executive Vice President for COSCO Shipping Lines (North America), Inc. My address is 100 Lighting Way, Secaucus, NJ 07094. My email address is howardf@cosco-usa.com.

In addition to any questions that Commissioners may have, I intend to address the risk management function of detention and demurrage charges, my company's policies on detention and demurrage, examples of how we handled crisis situations like recent hurricanes and our practices for mitigation of those charges in appropriate circumstances under our tariff and service contract provisions.

Kindly advise if you have any questions, and also please let me know at your earliest convenience the date and time that the Commission would like for me to appear.

Sincerely

Howard Finkel

Executive Vice President