

January 26, 2017

Rachel E. Dickon
Assistant Secretary
Office of the Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573-0001

RE: FMC Petition No. P4-16

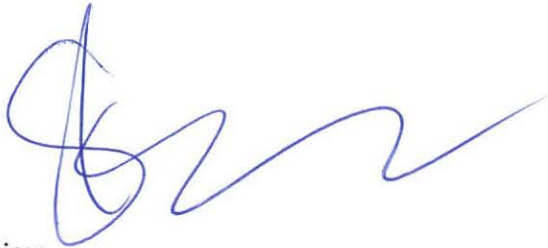
Dear Assistant Secretary Dickon:

Paxton International fully supports the petition from the Coalition for Fair Port Practices proposing that the Federal Maritime Commission require container lines and terminals to reasonably extend free time for cargo or equipment when ports are disrupted by events outside the control of shippers, truckers, and transportation intermediaries.

It is clear that some carriers and terminals have used the unfortunate circumstances that unfolded after the Hanjin bankruptcy, the West Coast labor disputes, and other disruptive events. There are vast inconsistencies in the conduct of carriers and terminals with respect to free time, demurrage, and detention practices as well as a lack of clarity in regards to what constitutes reasonable practices under Section 41102(c).

More clarity and oversight is required and the Federal Maritime Commission has the authority to regulate this issue. An adoption of the policy proposed by the Coalition for Fair Port Practices will provide much needed guidance, clarity, and relief to all parties involved.

Respectfully,



Shannon Viveiros
Vice President
Paxton International

Enclosures: (5) Copies of Original Reply