

ORIGINAL

cc  
OGC  
BTA  
Pub



RECEIVED

2017 FEB -2 PM 3:25

OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMMISSION

January 23, 2017

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

Re: Petition No. P4-16

Dear Assistant Secretary Dickon:

I am writing to advise that my company fully supports the rulemaking from the Coalition for Fair Port Practices published in the Federal Register on December 28, 2016. Eur-A-Med Shipping Ltd. is a licensed ocean transportation intermediary (NVOCC) founded in 1982.

Port congestion, resulting from weather events, inadequate port infrastructure and labor issues have caused severe delays in moving both loaded and empty containers. Our company has spent many man-hours attempting to remove or mitigate these fees with the carriers and ports, which in the end has cost our company and our customers large amounts of money and has further delayed our cargo, since often these charges must be paid in advance. Even when we do mitigate or eliminate these charges, hours have been spent and wasted doing so, which is a great cost to our company's efficiency. As the shipper on the Master bill of lading, our company is ultimately responsible for these charges, and it is often difficult to collect these from our customers.

We believe that the Shipping Act makes it clear that the assessment of demurrage and detention in situations where the delays are not the fault of the cargo interests, so we do not think that any new regulation is needed. The FMC just needs to enforce the regulations that currently exists.

We urge the Commission to initiate a proceeding to consider this important issue to many OTI's across the USA.

Respectfully,

JOHN S. JAMES CO.

  
Thomas C James  
Chief Exexecutive Officer

3820 Faber Place Drive, Suite 300, Charleston, SC 29405  
Tel: (843) 554-6400 Fax: (843) 554-4270 OTI# 16319N