

ISA Industrial Limited

16th Feb 2017

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:

ISA Industrial Limited (ISA) is pleased to respond to the Federal Maritime Commission (FMC) Federal Register notice published on December 28, 2016 concerning a petition for rulemaking from the Coalition for Fair Port Practices. Our company fully support the policy statement requested by the Coalition which would help bring about more reasonable demurrage and detention practices for cargo moving through our nation's seaports. We urge the FMC to begin a formal rulemaking on this matter as soon as possible.

I am Uwe Hutzler, CEO of ISA TanTec Group. ISA is the most environmentally advanced tannery group worldwide, has 3 most modern tanneries located in The United States, China and Vietnam. We are not only market leaders, but also the fastest growing tannery group in the market, recognized by the world's top footwear brands as a supplier of premium quality leathers. Our company mainly import hides 80% from US, approx.100 containers monthly to Asian tanneries by sea, and also import hides, chemical, machines and spare parts from overseas by sea to our own US facility.

Our company has experienced repeated incidents of severe congestion at container terminals in U.S. ports on both the West Coast and East Coast which have prevented us from picking up our cargo to US inland and delay the export shipment to feed Asian production/returning empty containers. Each container costs US\$800~1,000 just for congestion surcharge on a freight prepaid basis, not including extra detention/demurrage cost.

Whether those incidents involved weather, labor contract negotiations, the arrival of very large ships or other disruptions, the port delays were beyond our control/the control of the importers, exporters or draymen. All too frequently shippers and truckers are being charged demurrage and detention penalties for late pickup or return of containers when it is not their fault. If the terminal is closed during normal working hours, or if a container is unavailable for pickup during the free time period due to congestion or other disruption at the port, carriers and terminals should not assess demurrage. The same is true for

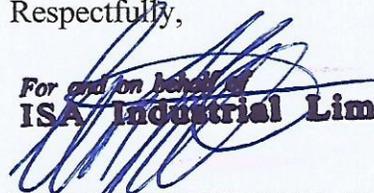
ISA Industrial Limited

detention charges when attempts to return an empty container are frustrated. These are real costs that hurt American businesses and American competitiveness.

The Coalition for Fair Port Practices has proposed a policy statement that would help to stop this unfair practice. The FMC has the authority to ensure that demurrage and detention practices are fair and reasonable and it needs to act to address this problem.

The FMC has taken important steps to examine port congestion issues challenging carriers, shippers, terminals and intermediaries. As the next step, we urge you to grant the petition and open a rulemaking on the Coalition's policy statement to ensure that US imports and exports are not burdened with unfair demurrage and detention charges. Thank you for considering our views.

Respectfully,


For and on behalf of
ISA Industrial Limited

Uwe Fritzier
Authorized Signature(s)
CEO

ISA Industrial Limited