

# John S. James Co.

ORIGINAL

CUSTOM HOUSE BROKER  
TREAS. DEPT. LICENSE NO. 5611  
INTERNATIONAL FREIGHT FORWARDER  
FMC LIC. 0150-F  
AIR CARGO AGENT  
CHARTER BROKER

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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. John S. James Co. is a licensed ocean transportation intermediary founded in 1941 with offices in Savannah and Atlanta, GA; Charleston, SC; Charlotte, NC; Knoxville, TN; and Jacksonville, FL.

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.

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.

  
P. Jill James  
Chief Operating Officer