



WORLD SHIPPING COUNCIL  
PARTNERS IN TRADE

December 5, 2017

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

By email: [secretary@FMC.gov](mailto:secretary@FMC.gov)

Re: Petition No. P4-16; Petition of the Coalition for Fair Port Practices for Rulemaking; Notice of Intent to Testify of John Butler, World Shipping Council

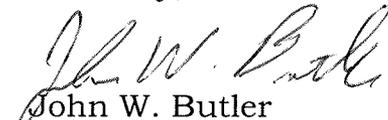
Dear Ms. Dickon:

On November 16, 2017, the Commission issued a notice scheduling a public hearing on January 16 and 17, 2018, in Petition P4-16. Please accept this notice of my intent to testify on behalf of the World Shipping Council (WSC). I am President and CEO of WSC. My address is 1156 15<sup>th</sup> Street, NW, Suite 300, Washington, DC 20005. I can be reached by telephone at (202) 589-0106 or by email at [jbutler@worldshipping.org](mailto:jbutler@worldshipping.org).

WSC has filed two rounds of comments with respect to Petition P4-16. In addition to answering any questions that the Commission may have, I intend in my testimony to summarize the primary points from our prior written submissions, discuss the Commission's precedent regarding the factual and legal standards for the Commission's consideration of regulations of national application, review the existing dispute resolution tools available for addressing commercial disagreements over detention and demurrage charges, and explore the practical difficulties of applying one-size-fits-all regulations to factually complex and varied operational situations, many of which are governed by commercially negotiated service contracts.

Kindly advise if you have any questions.

Sincerely,

  
John W. Butler  
President and CEO