



# WASHINGTON TRUCKING ASSOCIATIONS

EXECUTIVE VICE PRESIDENT  
Sheri Call

PRESIDENT  
Thomas E. Walrath, Jr.

February 22, 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:

The Washington Trucking Associations (WTA) is pleased to provide comments 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. The WTA, who actively represents Intermodal Motor Carriers in the State of Washington, fully supports 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, particularly those containerized shipments moving through the Puget Sound Gateway in the Pacific Northwest. We urge the FMC to begin a formal rulemaking on this matter as soon as possible.

I am the Associations' Executive Vice President, with years of experience and key responsibilities for supporting our members legislatively at the Washington State Legislature and with Federal Agencies responsible for ocean borne import and/or export containerized shipping. The Puget Sound Gateway, through its North and South Harbors, handles both breakbulk and containerized shipments to and from Asia and major distribution points in the Midwest, Ohio Valley and the East Coast. The value of this two-way international trade totals more than \$75 billion. Ensuring the smooth throughput without congestion for containerized shipments and more importantly, quick turn-times for intermodal motor carrier trucks, is a top priority.

Congestion at the various ocean terminals, whether it is caused by labor disputes, container booking issues at the terminals, or delayed vessel loadings/of loadings are common causes of delay outside of the control of intermodal motor carriers. Consequently, the WTA has observed repeated incidents of these carriers being unfairly assessed various detention/demurrage charges, sometimes totaling in the hundreds of thousands of dollars, due to delays that were beyond the control of the importers, exporters or the intermodal motor carriers. 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 Submitted,

A handwritten signature in blue ink that reads "Sheri Call". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Sheri Call  
Executive Vice President  
Washington Trucking Associations