



AMERICAN COFFEE CORPORATION

30 Montgomery Street Suite 1250 Jersey City NJ 07302

www.amcof.com t: 201.433.2500 f: 201.433.2501

December 1, 2017

Rachel Dickon  
Assistant Secretary  
Federal Maritime Commission  
800 North Capitol St. NW, Room 1046  
Washington, DC 20573-0001  
Email: secretary@fmc.gov

Re: Petition No. P4-16 - Petition of the Coalition for Fair Port Practices for Rulemaking

Dear Assistant Secretary Dickon:

As president of American Coffee Corporation, I am responsible for all operations including all ocean borne containerized shipments. Our company handles approximately 2,000 TEUs per year of green coffee beans from Asia, Africa, Central and South America into 15 ports of entry along all three U.S. coasts. We maintain service contracts with several major carriers and include free time privileges within the service contract terms. However, we are often in disagreements with our carriers and the terminal operators that serve them over the fair and practical application of those privileges, and are regularly frustrated at our inability to reach amicable settlements.

Our company has experienced many incidents of severe congestion at container terminals which had prevented our draymen from picking up our cargo and returning empty containers within the allowed terminal and equipment free time privileges. We have also experienced numerous delays caused by U.S. governmental holds including Customs VACIS examinations, CET intensive examinations and USDA inspections, which are not always completed within our free time privileges allowed under our negotiated carrier service contracts.

Although we have already submitted a verify statement and expressed our support for the referenced petition, I would very much appreciate the opportunity to appear before the FMC during the open hearings to be held on January 16 and 17, 2018 and provide oral testimony.

I appreciate your consideration and look forward to your positive response.

Sincerely,  
**AMERICAN COFFEE CORPORATION**

Donald A. Pisano, President

American Coffee Corporation, 30 Montgomery Street - Ste. 1250, Jersey City, NJ 07302  
Tel.: 201-433-2807; Email: dpisano@amcof.com