

BEFORE THE  
FEDERAL MARITIME COMMISSION

Docket no. 13-05

Ocean Transportation Intermediary Licensing and Financial Responsibility Requirements, and  
General Duties

Notice of Proposed Rulemaking

Comments

Submitted by

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Piero Ugo Lazzeri  
President

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Fedespedit – Federazione Nazionale delle Imprese di Spedizioni Internazionali – submits these comments on Docket no. 13-05 as a non-confidential information.

### **WHO IS FEDESPEDI**

Established in June 1946, FEDESPEDI - Federazione Nazionale delle Imprese di Spedizioni Internazionali - is the Federation of the Italian Freight Forwarding companies.

Fedespedit currently is the trade association in the field of transport representing and safeguarding the interests of almost all international freight forwarders in Italy.

Our members are engaged in the national and international movement of freight by all modes of transport (road, rail, sea, air), having deep knowledge and professionalism within the supply chain and a natural vocation towards internationalization.

Most of our members are referred to as “Multimodal Transport Operators” or “Logistics Service Providers”: stakeholders which are able to plan, deal with and safeguard the whole freight forwarding business and to take care of the interests of their customers, providing a considerable role within the Italian economic system.

### **FEDESPEDI NUMBERS**

Fedespedit represents about 2.200 companies, employing directly more than 80.000 individuals and 100.000 as an industry. Fedespedit members are located throughout Italy, producing a turnover of about 20 billions €

At international level Fedespedit is a member of:

- Clecat (Comité de Liaison Européen des Commissionnaires et Auxiliaires de Transport) which is the European Association for forwarding, transport, logistic and customs services
- Fiata ( Fédération Internationale des Associations de Transitaires et Assimilés) which is the world organization of the freight forwarding community.

## **FEDESPEDI MISSION**

Our Federation, in brief, has the mission to:

- Promote the knowledge, the analysis and the solution of problems concerning the freight forwarding industry, so as to improve efficiency and profitability;
- Create and maintain appropriate connections with national, foreign and international bodies;
- Represent members in the relationships with national, regional or local authorities or with private institutions;
- Safeguard the nature of the freight forwarding activity and promote and improve it;
- Safeguard the interests of the industry in the legislative and regulatory field, as well as in social, economical, financial, union, fiscal and insurance areas;
- Promote publications, debates, conferences, training courses and seminars.

## **WHY WE SUBMIT COMMENTS**

Fedespedi already supported in the past several actions taken by other “sister associations”, such as TIA, as well as of our world federation - FIATA -, in order to assist our members who are engaged in daily business with the US (namely on NVOCCs tariff filing and in NRA, as an example).

While we acknowledge that the FMC improved the level playing field through the changes introduced within the OSRA (regrettably after many years of complaining by several stakeholders), we did point out in the comments we provided on August 2013 that the amendments under Docket No. 13-05 proposed at that time were a return to the past, because they were adding unnecessary red tape and costs for OTIs.

Fedespedi is pleased that the Commission did take into account the strong feelings expressed by many against that proposal and is grateful of the decision taken of re-considering it. Although, of course, there might still be few amendments to be done and minor aspects to be revised (such as in the mechanism of the renewal, where caution must be put in order not to make it burdensome and difficult), we did appreciate the work done by the Commission.

Respectfully submitted,

Piero Ugo Lazzeri  
President

