

Docket No- 13-05 Comments on Ocean Transportation Intermediary Regulation Revisions

Bill
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We are members of the NCBFFA and a licensed OTI-Freight Forwarder. We have reviewed the Federal Register notice on proposed changes and have the following comments;

Bonding:

We agree that the elimination of separate branch bonds is a good idea. It is an added cost that is not necessary for the protection of the shipper under the general single minimum bond requirement.

License Renewal:

We do not believe this is a good idea. We would support a triennial report similar to CBP. An on-line renewal process where the forwarder/nvocc could confirm their name, address, phone, qualifying officer etc. and make a payment would be the practical way to handle this without putting a strain on the personnel resources of the FMC.

Surety Reporting;

Many claims by shippers or other claimants are unwarranted. The surety is already required to inform you when a bond is cancelled or not-renewed. We do not agree that the surety should be required to notify the Commission of any claims filed.

Thank you for your consideration of our comments.

Sincerely,
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