



ORIGINAL

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 13-05

**OCEAN TRANSPORTATION INTERMEDIARY LICENSING AND FINANCIAL
RESPONSIBILITY REQUIREMENTS, AND GENERAL DUTIES**

COMMENTS OF [NAME OF COMMENTING INDIVIDUAL]

I am Wynelle Spurgeon, Vice President of Trans-World Shipping Service, Inc. located at 3206 Frenchmens Road, Toledo, Ohio 43607. We have a small branch office in Baltimore, Md. 21202. We are a member of NCBFAA.

I am familiar with the issues raised by the NPRM and the idea of having to renew our license every three years. We are aware that it is necessary to keep the commission advised if there are any changes in our corporate structure.

We are also customhouse brokers as such we must file a Triennial report every 3 years to advise the status of our employees. Would that not be sufficient for the FMC if additional regulation is required rather than a complete license renewal?

Any claims against Trans-World Shipping Service, Inc. would be handled by our insurance companies. There has never been an instance where our FMC bond has been involved.

Since it is necessary for our company to use third parties such as drayage companies, warehouses, railroad, truckers and steamship lines to transact our business they do not have OTI licenses and I can't the reason why it would be necessary. That would create a burden for all companies involved.

11/4/14

Wynelle Spurgeon