



Global Logistics Solutions

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August 28, 2013

Federal Maritime Commission  
800 North Capitol Street NW  
Washington, DC 20573-0001

Attention: Karen V. Gregory, Secretary

Regards: Comments on the FMC's Advanced Increase of Proposed Rulemaking in Regard to OTI Regulations

We are writing to express our concern with specific proposed rulemaking changes which will amend the Regulations governing ocean transportation, intermediary licensing and responsibility requirements. Our objections mirror those prepared by the NCBFAA. We specifically oppose the following proposed changes.

- Re-application, new fees, new reporting and renewal of FMC licenses every two years.
- Increased bond amounts for FMC bonds from \$50,000 to \$75,000 for ocean freight forwarders, from \$75,000 to \$100,000 for NCOCCs and from \$150,000 to \$200,000 for foreign registered NVOCCs.
- Reduced bond amounts and a special license for those involved strictly in small package household goods barrel trade, when the actions of these parties are those that result in the most complaints received by the FMC and were the focus of FMC Fact Finding Investigation No. 27, Unlawful, Unfair or Deceptive Ocean Transportation Practices related to the Movement of Household Goods of Personal Property in U.S. – Foreign Ocean borne Trades.
- Institution of a priority system for paying claims made against bonds which would leave OTI last in line for claims against bonds.
- Regulations requiring that any shipping documentation or advertising by agents bear the name and license number of the principal OTI.

We would also like to express our support for the requirement that qualified individuals for a FMC license must gain their three years of experience while working for a legally licensed party

If you have any questions or comments, please address them to the undersigned.

Sincerely,

R. L. Swearer Co., Inc.

Charles W. Watson, LCB, CCS  
Vice President

