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From: **Sefco Export Management Company, Inc. - client services - NY office**<info@sefco-export.com>

Date: Fri, Aug 30, 2013 at 4:58 PM

Subject: comment from Joe Quinn / founder / owner of Sefco Export Management Company, Inc., and Quinn Corporate Services, Inc.

To: secretary@fmc.gov, joseph.quinn@sefco-export.com

For: Karen Gregory
FMC / email: secretary@fmc.gov

Hello,

I hope this note finds you well.

With respect to:

[Commission Extends Comment Period for OTI Rules](#)

Comments on the Advanced Notice of Proposed Rulemaking in Docket No. 13-05, published on May 31, 2013, are due on or before August 30, 2013.

posted: http://www.fmc.gov/news/default.aspx?F_All=y

As you may remember, I last wrote to the FMC, in a formal manner, in May 2011, about a matter that has been a bane on my existence for well over three years now.

Months after that May 2011 formal petition -- which was part of a very agonizingly long process I was dragged through (over a specious and vindictive complaint that was dismissed in a local small claims court here in NYC); months later - in August 2011, after what I regard as adverse handling that was put under further review - I had my local US representatives office contact your office; he then heard back in November 2011 (via Congressional liaison).

Not a word, since then. Breeding a climate of deep uncertainty and significantly harming my own personal degree of trust.

Please refer back to what I have already written, prior and therein.

In my formal written submission - years ago - I concluded in writing about the "Chilling Effect" -- kindly have a look at exactly what I wrote --
-- the chilling effect on me, and my outlook on my entire career, several decades -- on learning "how to" - and actually facilitating and promoting - US Exports.

As a result of all that - in particular the chilling effect on me -- at this time and in this venue, however and unfortunately,

I do not feel I can share -- in a confident manner, my thoughtful analysis based on real life experience over several decades;

-- my suggestions, my policy recommendations, comment on the law, statutes, regulations and Acts as they currently exist

-- beyond this general caveat:

"More uncertainties, more USG charges levied, and more USG regulation - will kill US jobs, harm good small businesses, and cut-short many decent opportunities"

Final note here --

Back on May 6 2011, I was actually in your office on North Capitol Street, on a Friday afternoon, just after attending a re-union of people who once worked at/or were connected to the US State Department; its a function that I attend every year. Around that time I had contacted your office, in advance of my visit back to DC, to see if there was anyone at the FMC I would be available to talk to and meet, but I was rebuffed. No takers. All I could do was gain a few minutes access to the library (with my close friend, a nice gal from Japan) but we had to leave after less than 5 minutes, nothing really accomplished, no connection made. Its a shame I was rebuffed. (I had Yoko-chan take a photo of me there, its attached).

I am not a scary person. If someone in DC at the FMC in a position of authority is willing to sit down with me, for a honest and open conversation, I am willing to come to the Hill, provide the location and even buy the hamburger and beer. In lieu of that felicitous occasion - a burger and beer in the Hill, in time I will circle back to my new local US Rep., who's office I have been in touch with a couple weeks ago, to try to be helpful to me.

I am looking to get together a QCS "MARITIME WORKING GROUP" as a effort organized by my private company, QCS - Quinn Corporate Services, Inc. I would like to use this effort to formulate better laws and regs, so that people like me, don't become bitter about our own USG.

It's better to work together. I will post my own experiences and other analysis on the QCS web site, conduct surveys, and work with our elected officials to get things right. I will ask my US Rep. to join the Maritime Working Group, and I shall invite others as well.

Thank you.

Best regards,

Joseph Quinn

sole owner/founder

Sefco Export Management Company, Inc.

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Also --- sole owner:

Quinn Corporate Services, Inc.

QCS - www.quinncorp.us.com