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Ms. Karen V. Gregory
Secretary
Federal maritime Commission
800 North Capitol Street, N.W.
Washington DC. 20573-0001

Dear Ms. Gregory,

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

I am Jeanette R. Gioia, president and qualifying officer of Serra International, Inc. (OTI 0282F) and its wholly owned NVOCC subsidiary, Serra Shipping, Inc. (OTI 16314N). We have been a U.S. business since 1919 and consider ourselves to fall in to the small to mid-sized OTI range, operating OTI activities from only two offices.

We would like to express our support for the comments submitted by the National Customs Brokers and Forwarders Association of America, Inc. in response to the Advance Notice of Proposed Rulemaking in Docket No. 13-05. In particular we oppose the following as unnecessary and adding to the cost and time of OTIs that would be better spent in growing their business.

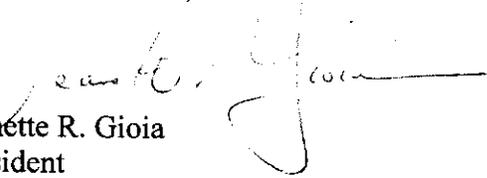
- Renewal of FMC licenses every two years, new unidentified fee amounts, and numerous new reporting requirements;
- Increased bond amounts for FMC bonds from \$50,000 to \$75,000 for ocean freight forwarders, from \$75,000 to \$100,000 for NVOCCs and from \$150,000 to \$200,000 for foreign registered 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.
- While three years of the qualifying individual's (QI) experience should be with a licensed OTI, the other proposed QI regulations suggest the Commission wants to exert an undue control on the internal organization of an OTI. The Qualifying individual is already an active officer or owner and as such is responsible for corporate compliance.
- 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.
- Listing of claims and court actions on the FMC's website. This could harm the reputation of OTIs for claims with no merit that still might be posted. We have direct experience with unjust legal action. A trucker we engaged recently to deliver import containers sued us in NJ Superior Court to recover the full amount of his invoices that we had short paid. We were notified on a steamship line bill of lading and feared being held responsible for the trucker's error in not returning the containers within the free time. We were acting as a Customs Broker in this instance. According to the proposed regulations this court claim which has nothing to do with our ability to be a responsible OTI could end up published on the FMC website. This would be wrong and misleading.

The Executive Order 13563 sought to reduce unnecessary regulatory burdens and costs. We are seriously concerned that proposed regulations do the exact opposite and without consideration of the challenges that face companies trying to be compliant, provide a good service to customers, and still make a profit in an economically uncertain world. We suggest that the Commission provide far more proof that the entire shipping public will be harmed if these regulations are not put in to effect. We believe the shipping public is more than protected with the current regulations.

Respectfully submitted,

Serra International, Inc.


Jeanette R. Gioia
President