

Federal Maritime Commission

**Response to Advanced Notice
Of Proposed Rulemaking**

**AMENDMENTS TO REGULATIONS
GOVERNING OCEAN TRANSPORTATION
INTERMEDIARY LICENSING AND
FINANCIAL RESPONSIBILITY
REQUIREMENTS, AND GENERAL DUTIES**

(Docket# 13-05)

Submitted by:

**Werner Enterprises, Inc.
14507 Frontier Road
Omaha, NE 68145**

July 9, 2013

**Contact: Richard Reiser
Vice President of Government Affairs**

Werner Enterprises, Inc. ("Werner" or the "Company") is a transportation and logistics company engaged in providing transportation and logistics services worldwide. Through our wholly owned subsidiary, Werner Global Logistics U.S., LLC, we are a licensed OTI by the FMC (as a freight forwarder and NVOCC). We were incorporated in the State of Nebraska on September 14, 1982, and are headquartered in Omaha, Nebraska.

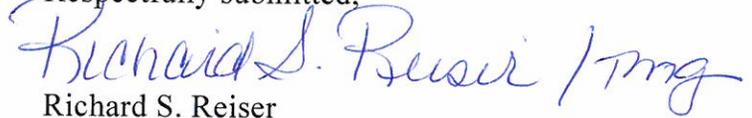
Werner Global Logistics U.S., LLC is also a member of the National Customs Brokers and Forwarders Association of America, Inc. ("NCBFAA").

We have read the Advanced Notice of Proposed Rulemaking as published in the Federal Register/Vol. 78, No. 105, on Friday, May 31, 2013, and have also read the Comments of NCBFAA filed in response thereto. We are in agreement with the comments made by NCBFAA and are opposed to the proposed regulations for the reasons stated therein. Specifically, we agree that the proposed changes do not enhance the efficiency or reliability of the shipping industry and that any perceived benefit is outweighed by the regulatory burden imposed.

Also, although not directly in response to the ANPR, we generally support the additional Suggested New Revisions offered by NCBFAA in their comments.

We appreciate the opportunity to comment on the ANPR but do not believe that the proposed changes are necessary or that they would be beneficial.

Respectfully submitted,

A handwritten signature in blue ink that reads "Richard S. Reiser /img". The signature is written in a cursive style with a large initial 'R' and a trailing slash followed by the letters 'img'.

Richard S. Reiser

Vice President of Government Affairs