

◀KCarltonInternational▶

ship with confidence

August 22, 2013

Federal Maritime Commission
800 North Capital Street NW
Washington, DC 20573-001
Attn: Karen V. Gregory
Secretary

Subject: Federal Maritime Commissions Advance Notice of Proposed Rulemaking

Dear Ms. Gregory,

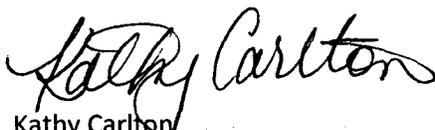
This correspondence is to state that K. Carlton International DBA KCI Shipping Line OTI, Freight Forwarder and NVOCC No.18122NF supports the comments presented by NCBFAA and specifically oppose:

- 1) Re-application, new fees, new reporting and renewal of FMC licenses every two years.
- 2) 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.
- 3) 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 the 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.
- 4) Institution of a priority system for paying claims made against bonds which would leave OTI last inline for claims against bonds.
- 5) Regulations requiring that any shipping documentation or advertising by agents bear the name and license number of the principle OTI.

Furthermore, we support the requirement that qualifying individuals for an FMC license must have gained their three years of experience while working for a legally licensed party.

Sincerely,

K.CARLTON INTERNATIONAL



Kathy Carlton
OTI, Licensed Customs Broker