

ATTN: KAREN GREGORY – SECRETARY OF THE FEDERAL MARITIME
COMMISSION

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. 13-05

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

COMMENTS OF CHARLES M SCHAYER JR.

I am president of Charles M Schayer & Co, FMC license number 1349F, located at 3839
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The proposed requirement for all forwarders and NVOCC's to renew licenses every two
years by filing an application and paying a fee is unnecessary and burdensome. The time
required to process the application would use valuable staff time. We are currently
required to advise the FMC if we have any material changes.

The proposed requirement to increase bond amounts is costly and unnecessary
particularly for small to medium size OTIs. Over the years, many financial tools have
been developed to protect those doing business with OTI's. These include shipper's all
risk insurance, accounts receivable insurance, etc. Under the present bonding system,
many of the 5900 registered or licensed OTI's have multiple bonds.

The ANPRM proposes that the FMC website list claims by carriers and sureties that
relate in any way to the transportation activities of a forwarder or NVOCC. Since initial
claims may not have merit this could tarnish the name of a reputable company and could
be very damaging. Many OTI's will settle financial responsibilities either directly or
through an insurance company. This process takes time and an OTI's name and
reputation should not be tarnished so long as the OTI is adhering to common business
practices with regard to resolving a claim (which may be legitimately in dispute).

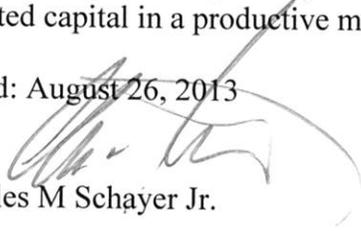
The ANPRM proposes rules with respect to the advertising by the OTI and its agents.
Specifically, the Commission proposes regulations requiring that any shipping
documentation or advertising by the agents bear the name and license number of the
principal OTI. Aside from not being clear with regard who is an agent; there does not

appear to be a compelling reason for this requirement which is burdensome and costly without a corresponding benefit.

We question the value of the regulation that requires us to submit our tariff rates. We have never had a customer that has ever accessed the tariff. We do not see any public service benefit by filing the tariff rates.

Unnecessary regulations, such as those outlined in the ANPRM and tariff rate filing regulations, unduly burden small businesses that are integral to our nation's economic success. The choice is simple. We either spend funds on regulations that contribute little if anything to the public good or which serve no useful purpose or we use our very limited capital in a productive manner including job creation and hiring new employees.

Dated: August 26, 2013



Charles M Schayer Jr.