

**Federal
Maritime
Commission**

Fwd: FMC Proposed Changes to OTI's & NVOCC's

Rachel Dickon <rdickon@fmc.gov>
To: Secretary Mailbox <secretary@fmc.gov>

Wed, Jul 24, 2013 at 2:25 PM

for 13-05 Joanne
Rachel Dickon
Assistant Secretary
Federal Maritime Commission
(202) 523-5725

----- Forwarded message -----

From: **Kemal Kurtulus** <kkurtulus@fmc.gov>
Date: Wed, Jul 24, 2013 at 2:05 PM
Subject: Re: FMC Proposed Changes to OTI's & NVOCC's
To: Rachel Dickon <rdickon@fmc.gov>, Karen Gregory <kgregory@fmc.gov>
Cc: Jeremiah Hospital <jhospital@fmc.gov>, James Nussbaumer <jnussbaumer@fmc.gov>

Colleagues,

Trina Mercedes Gomez of [Choiceone Logistics](#) (Org: 015987), is a former-licensee who currently has a pending FMC-18 application with BCL. She has briefly responded to the advanced notice of proposed rules under 13-05.

Kemal

On Wed, Jul 24, 2013 at 1:45 PM, Trina Gomez <cargo@choiceonelogistics.com> wrote:

Dear Mr. Kurtulus:

It was a pleasure talking to you this morning. As per your request, I am very glad for this opportunity your giving me to tell you my inputs about the proposed changes as well as future changes in the FMC regulations for OTI's from a small business perspective. As you know, Choiceone Logistics, Inc. was a licensed freight forwarder and an NVOCC for almost 15 years. I started this business after 12 years working for a global international logistics company and for an ocean carrier.

As I expressed to you during our telephone conversation, raising the bonds for Freight Forwarders and NVOCCs will definitely impact small businesses. In this particular issue, I tend to disagree because this action will increase the already high operation costs and will benefit surety bond riders companies.

In regards to proposed amendment about the two year renewal requirements, I am in favor of renewal requirements, as opposed to never have to renew an OTI license. Hopefully, the renewal process and requirement are simpler than the original application. In the area where my business is located (South Florida), there is a lot of competition and new comers to the industry , therefore by having more frequent renewals the information provided by OTI's in their original application, will be accurate and up-to-date.

For the requirements for OTI's / NVOCC's agents outside the United States, I agree on this issue. Agents needs to be registered, this is an excellent way to paper trail an export shipment, as well as the accountability of these entities.

Thank you again for the opportunity to send my opinion on the above-mentioned matters.

Sincerely,

Trina Mercedes Gomez

Choiceone Logistics, Inc.

Tel: 305-592-1308

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**Kemal Kurtulus, Industry Analyst
Federal Maritime Commission**