

**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 DANIEL PETROSINI

I am Daniel T Petrosini, president of a four office OTI comprised of an NVOCC (President Container Line no 17621N) and a forwarder (Alpha International no 4668)

I am familiar with the needless and burdensome issues raised by ANPRM

I firmly believe the FMC's proposal to require all forwarders and NVOCCs to renew licenses every two years by filing an application and paying a fee is unnecessary and nothing more than needless regulation from an administration that seems hell bent on burdening business. My supporting reasons follow;

This is unnecessary because all OTIs are already required to keep the Commission informed of any changes in their corporate structure, officers and directors, and locations of their headquarters and branch offices. This is nothing more than a NEW TAX!

Additionally, The proposal to increase the bond amount from \$50,000 to \$75,000 for forwarders, from \$75,000 to \$100,000 for NVOCCs, only accomplishes to increase costs for OTI's There is NO good reason to single out our industry. This would be an increase in the cost of business for small OTIs, which just increases cost without providing any benefit in the services that are being provided.

The FMC to should NOT institute a priority system for paying claims that are made against bonds; as proposed, the Commission would require that the sureties pay, first, any shippers with claims, then any carriers and OTIs; and third, any government claims. There is no reason why shippers should have a priority over OTIs, since NVOs are also shippers in their relationship to the carriers. Similarly, if an OTI is a claimant, any monies that may be due from another OTI under the bond is money for which the claimant cannot be insured, unlike the situation with shippers, so it is unfair for the Commission to pick winners and losers.

It is TOTALLY inappropriate for the Commission to require carriers and sureties to file with the FMC a list of any claims made by them that relate in any way to the transportation activities of a forwarder or NVOCC, when that listing will be made public on the Commission's website.

The proposed regulation is simply STUNNING in its breadth and scope and accomplished nothing but increasing costs and burdens on an industry that struggles to compete. The Commission should focus on eliminating the silly requirement to publish tariffs and NSA's.

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Daniel T Petrosini

Celebrating over 34 years of service!

Best Regards,
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