

BEFORE THE  
FEDERAL MARITIME COMMISSION

FMC Docket no. 13-05  
Amendments to Regulations Governing Ocean Transportation Intermediary Licensing and  
Financial Responsibility Requirements, and General Duties

Comments  
Submitted by

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Piero Ugo Lazzeri  
President  
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Fedespedi – Federazione Nazionale delle Imprese di Spedizioni Internazionali – submits these comments on Docket no. 13-05 as a non-confidential information.

## **WHO IS FEDESPEDI**

Established in June 1946, FEDESPEDI - Federazione Nazionale delle Imprese di Spedizioni Internazionali - is the Federation of the Italian Freight Forwarding companies.

Fedespedi currently is the trade association in the field of transport representing and safeguarding the interests of almost all international freight forwarders in Italy.

Our members are engaged in the national and international movement of freight by all modes of transport (road, rail, sea, air), having deep knowledge and professionalism within the supply chain and a natural vocation towards internationalization.

Most of our members are referred to as “Multimodal Transport Operators” or “Logistics Service Providers”: stakeholders which are able to plan, deal with and safeguard the whole freight forwarding business and to take care of the interests of their customers, providing a considerable role within the Italian economic system.

## **FEDESPEDI NUMBERS**

Fedespedi represents about 2.200 companies, employing directly more than 80.000 individuals and 100.000 as an industry. Fedespedi members are located throughout Italy, producing a turnover of about 20 billions €

At international level Fedespedi is a member of:

- Clecat (Comité de Liaison Européen des Commissionnaires et Auxiliaires de Transport) which is the European Association for forwarding, transport, logistic and customs services
- Fiata ( Fédération Internationale des Associations de Transitaires et Assimilés) which is the world organization of the freight forwarding community.

## **FEDESPEDI MISSION**

Our Federation, in brief, has the mission to:

- Promote the knowledge, the analysis and the solution of problems concerning the freight forwarding industry, so as to improve efficiency and profitability;
- Create and maintain appropriate connections with national, foreign and international bodies;
- Represent members in the relationships with national, regional or local authorities or with private institutions;

- Safeguard the nature of the freight forwarding activity and promote and improve it;
- Safeguard the interests of the industry in the legislative and regulatory field, as well as in social, economical, financial, union, fiscal and insurance areas;
- Promote publications, debates, conferences, training courses and seminaries.

### **WHY WE SUBMIT COMMENTS**

Fedespedit already supported in the past several actions taken by other “sister associations”, such as TIA, as well as of our world federation - FIATA -, in order to assist our members who are engaged in daily business with the US (namely on NVOCCs tariff filing and in NRA, as an example).

While we acknowledge that the FMC improved the level playing field through the changes introduced within the OSRA (regrettably after many years of complaining by several stakeholders), we have to point out that the proposed amendments under Docket No. 13-05 are a return to the past, adding unnecessary red tape and costs for OTIs.

Fedespedit is concerned with the proposed rulemaking because we do retain that it does not correspond both to the current operational situation of the market (failing to understand the importance of 3PLs within it) and to the needs of the industry: we fail to understand how increasing the financial responsibility (and thus insurance premiums) and imposing registration renewals (implying, again, additional costs and, what's worst, additional bureaucracy) might be useful to anyone: the whole supply chain would be involved, with the main burden being put, ultimately, upon end users.

There are several amendments within the proposal being not workable and problematic, both for SMEs and for larger firms (although for different reasons) but the common denominator is certainly the increase in regulation (versus a required deregulation) and its related costs (considering the economic turmoil we're still caught in, not such a welcome action).

For the reasons set forth above, Fedespedit is asking the Commission to take a step back, reconsidering its positions while starting a real process of consultation with the industry.

Respectfully submitted,

Piero Ugo Lazzeri  
President

