

HARRIS INTERNATIONAL FREIGHT FORWARDERS, INC
200 WEST THOMAS STREET, STE 430
SEATTLE, WA 98119
206 621 9910 - FMC 022138F

August 22, 2013

Federal Maritime Commission
Ms Karen Gregory
800 North Capital Street NW
Washington, DC 20573-0001

Dear Ms Gregory,

We would like to respectfully voice our strongest objections to the proposed amendment to the OTI Regulations on Docket 13-05, for the following reasons:

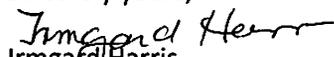
1. This requirement will place an un-necessary burden of time and resources on our industry, for which there are no compelling reasons. To my knowledge, OTI's have not been a major problem or plagued with constant violations due to improper or inadequate actions or failing to adhere to the regulations.

The registration process will be another time consuming activity that will bring little benefit to the consumer, the shipping industry or the regulation process.

While some simplified update process could be considered, the time frame should be more like every 5 or 10 years, similar to passports and drivers licenses.

2. In short, we strongly object and we totally support the NCBFAA's position in this matter as follows:
 - a. Re-application, new fees
 - b. Increased bond amount
 - c. Reduced bond amounts and special licenses for those involved in small packages
 - d. Institution of a priority system for paying claims
 - e. Regulations requiring that any shipping documentation or advertising by agents bear the name and the license number of the OTI.
3. We, however, 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 yours,


Irmgard Harris

Harris International Freight Forwarders, Inc.