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## **COMMENT OF THE INTERNATIONAL ASSOCIATION OF MOVERS (IAM)**

This comment is in response to the publication in the Federal Register of May 31 2013, on pages 32946 - 32978, in which the Federal Maritime Commission (FMC) put forth a 60-day notice and request for comments concerning the proposal to amend its rules governing the licensing, financial responsibility requirements, and duties of Ocean Transportation Intermediaries (OTIs).

The International Association of Movers (IAM) is a global, nonprofit trade association. With over 2,000 members located in the United States and 170 countries worldwide, our association is the leading authority and largest trade organization in this field. IAM works to facilitate the cooperation of household goods transportation service providers and customers around the world. The majority of IAM members are companies who arrange for the transportation of used household goods and personal effects of individuals in connection with their move to a foreign country or repatriation to the United States; the remainder of the Association's membership primarily forms a support group for this service, consisting of ocean carriers, motor carriers, local moving and storage companies, port agents, etc.

IAM has reviewed the Advanced Notice of Proposed Rulemaking (ANPRM) for 46 CFR Part 515 and wishes to specifically address the section 515.14, which focuses on the issuance, renewal, and use of license. We note that the ANPRM would require that all licenses, both forwarder and NVOCC, be renewed every two years, regardless of how long a company has held a license. Additionally, as part of that renewal process, the licensee would be required to pay a filing fee in an amount yet to be determined.

The International Association of Movers views this proposed requirement as necessary but overly burdensome to the OTI community in its current form because of the two year renewal requirement. While IAM recognizes the FMC's need for accurate information concerning the entities they license, it is likely that an OTI's information has not changed in the two years since it had first acquired or last renewed its license.

Regardless, IAM recognizes that the current process is insufficient and does not provide the FMC with the tools necessary to carry out its mission. As such, we would propose that the term of the license is increased from two years to five years. If, in the interim, an OTI's information changes, the FMC can mandate that company to report that new information or their license will be revoked or suspended. A slightly longer renewal period will reduce the regulatory burden but still provide the FMC with accurate data for their records.

IAM applauds the efforts undertaken by the FMC to prevent further abuses of the American consumer when moving internationally to and from the United States. Unfortunately, there is no simple solution to this issue. In our experience though, increased regulation tends to fall upon the



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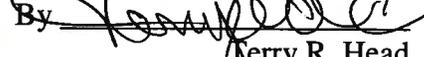
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entities that choose to comply with the existing regulations. Those companies who take advantage of unwitting consumers will continue to operate outside the bounds of the current regulatory framework while the licensed entities bear the brunt of increased costs and regulation.

In summary, IAM backs the efforts of the Federal Maritime Commission to adapt to changing industry conditions, improve regulatory effectiveness, improve transparency, and streamline processes to reduce regulatory burdens. Regardless of the outcome of the rulemaking, IAM will support the FMC in its determination to prevent further abuses of the American consumer and will provide our capabilities to communicate this information to our members and partners both here in the United States and abroad.

Respectfully Submitted,  
INTERNATIONAL ASSOCIATION OF MOVERS, INC.

By   
Terry R. Head  
President