

On Mon, Aug 12, 2013 at 10:19 AM, Kemal Kurtulus <kkurtulus@fmc.gov> wrote:
Dennis Jones of Offshore Logistics L.L.C. (Org:022353) has briefly commented on two specific items for Docket 13-05.

Kemal Kurtulus, Industry Analyst
Federal Maritime Commission

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

From: <dennis@oslogistics.net>
Date: Sun, Aug 11, 2013 at 3:01 PM
Subject: Re: OTI Regulations
To: Kemal Kurtulus <kkurtulus@fmc.gov>

Having read the proposed regulation changes I would like to comment on two sections

Ref: 515.14

I understand the request for the renewal application for the sole purpose of cleansing the records of the FMC. If the process is seamless, easy, and no cost to the NVOCC I have no objection.

Ref 515.21

This recommendation I do not see the need for. The increase of the Bond from \$75000.00 to \$100000.00 will have little if any effect on the problems that are explained in the briefing. Recognizing the more important issue is that the NVOCC indeed has a bond and satisfies the primary "financial responsibility" is the real purpose not the additional \$25000.00 dollars. The additional funds requirement will only, at the end of the day, have little effect if any except to allow another \$25000.00 to divide up amongst the claimants.

Dennis Jones, CEO

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