



SENATOR INTERNATIONAL FREIGHT FORWARDING LLC

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August 22, 2013

Federal Maritime Commission
800 North Capitol Street NW
Washington, DC 20573-0001
Attn: Karen V. Gregory
Secretary

RE: FMC Notice of Proposed Rule Making regarding OTI regulations

Dear Secretary Gregory:

Senator International Freight Forwarding LLC, ("Senator") submits these comments in response to the Advanced Notice of Proposed Rulemaking ("ANPRM") published in this docket May 31, 2013 (78 Fed. Reg. 32946).

We wish to advise that Senator supports the comments of the NCBFAA, and we specifically oppose:

- Re-application, new fees, new reporting and renewal of FMC licenses every two years.
- Increased bond amounts for FMC bonds from \$50,000 to \$75,000 for ocean freight forwarders, from \$75,000 to \$100,000 for NVOCCs and from \$150,000 to \$200,000 for foreign registered NVOCCs.
- Reduced bond amounts and a special license for those involved strictly in small package household goods barrel trade, when the actions of these parties are those that result in the most complaints received by the FMC and were the focus of FMC Fact Finding Investigation No. 27, Unlawful, Unfair or Deceptive Ocean Transportation Practices Related to the Movement of Household Goods of Personal Property in U.S. – Foreign Oceanborne Trades.
- Institution of a priority system for paying claims made against bonds which would leave OTI last in line for claims against bonds
- Regulations requiring that any shipping documentation or advertising by agents bear the name and license number of the principal OTI

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Senator does 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.

Thank you for your time and attention to this very important matter.

Sincerely,



Roscoe Wentworth

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