

Dolliff & Co., Inc.  
395 Maverick Street  
East Boston, MA 02128  
T: 617-561-0900 / F: 617-561-0181  
EMAIL: stuart@dolliffco.com

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August 27, 2013

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

RE: [Federal Maritime Commission's \(FMC\) Advance Notice of Proposed Rulemaking](#) regarding OTI regulations..

Dear Ms Gregory, please be advised that i/we completely support the comments presented by NCBFAA with regards you proposed new regulations to and 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.

Please note, however, we do 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 listening to our comments.

Sincerely,  
Stuart Eldridge  
President/Dolliff & CO., Inc.