

SIL SUPREME INTERNATIONAL, LLC

dba SUPREME MARITIME SERVICES (FMC LIC.# 021965NF)
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August 27, 2013

Federal Maritime Commission
800 North Capitol Street NW
Washington, DC 20573-0001

Attn: Karen V. Gregory - Secretary

Gentlemen:

DOCKET NO. 13.05 **COMMENTS ON OCEAN TRANSPORTATION** **INTERMEDIARY REGULATION REVISIONS**

Further to the FMC's Advance Notice of Proposed Rulemaking regarding OTI regulations, I do support the comments presented by NCBFAA 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.

I also 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,

A handwritten signature in black ink, appearing to read 'Tanimowo', with a large, stylized flourish extending to the right.

THOMAS A. TANIMOWO