March 3, 2022

The Honorable Chairman Daniel B. Maffei

Federal Maritime Commission

800 North Capitol Street, N.W.

Washington, DC 20573

Dear Chairman Maffei:

The undersigned associations submit this letter to respectfully request that the Federal Maritime Commission (FMC) extend the public comment period on its Advance Notice of Proposed Rulemaking (ANPRM) regarding demurrage and detention billing practices issued on February 15, 2022.[[1]](#footnote-1) Comments on the ANPRM are currently due on March 17, 2022, but we would greatly appreciate a 30-day extension. Our associations are in the process of surveying respective member companies to gather their experiences and document them in a manner that is most helpful to the FMC.

A 30-day extension would facilitate our respective efforts and would be consistent with the FMC’s goal to collect information regarding the impact of demurrage and detention billing practices on the trade.

Thank you for your consideration, and we look forward to continuing to work with the Biden-Harris Administration to ensure freight fluidity and bolster the U.S. innovation economy.

Sincerely,

American Chemistry Council (ACC)

American Forest & Paper Association (AF&PA)

Association of Food Industries

Auto Care Association

CAWA - Representing the Automotive Parts Industry

Consumer Technology Association (CTA)

Fashion Accessories Shipper Association

The Fashion Jewelry and Accessories Trade Association

Foreign Trade Association of Southern California

Gemini Shippers Association

Global Cold Chain Alliance

Home Fashion Products Association

Home Furnishings Association (NAHFA)

Institute of Scrap Recycling Industries, Inc. (ISRI)

International Association of Movers (IAM)

International Warehouse Logistics Association

Juvenile Products Manufacturers Association ~ JPMA

Leather and Hide Council of America

Meat Import Council of America

National Retail Federation (NRF)

National Sporting Goods Association

North American Association of Food Equipment Manufacturers (NAFEM)

North American Meat Institute

Retail Industry Leaders Association (RILA)

1. 87 Fed. Reg. 8,506 (Feb. 15, 2022). [↑](#footnote-ref-1)