

September 27, 2022

Mr. William Cody, Secretary
Federal Maritime Commission
800 North Capitol Street, N.W., Washington, DC 20573

Docket 22-24

Dear Mr. Cody:

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 the Definition of Unreasonable Refusal To Deal or Negotiate With Respect to Vessel Space Accommodations Provided by an Ocean Common Carrier (Docket No. 22-24) issued on September 21, 2022.

On behalf of the US agriculture exporters, we request an extension to file comments to November 7, 2022.

The Commission is to be congratulated on its efforts to implement the Ocean Shipping Reform Act of 2022, in a timely manner, consistent with Congressional intent. This Rulemaking is one of the most important of those that have and will be initiated; it warrants the additional time to assure collection of our member companies' experiences and document them in a manner that will be most helpful to the FMC.

This modest extension would be consistent with the FMC's stated goal to collect information regarding the frequency, manner and impact of ocean common carriers' refusal to deal or negotiate with respect to vessel space accommodations, in particular agriculture export cargoes.

Thank you for your consideration.

Sincerely,
Peter Friedmann
Agriculture Transportation Coalition – AgTC

California Cotton Ginners and Growers Association
International Fresh Produce Association
Leather and Hide Council of America
Meat Import Council of America
National Cotton Council
National Onion Association
North American Meat Institute
Pet Food Institute
U.S.A. Dry Pea and Lentil Council
U.S. Forage Export Council
U.S. Pea and Lentil Trade Association
Western Agricultural Processors Association
Western Growers
Wine and Spirits Shippers Association