



# MARITIME EXCHANGE

for the Delaware River and Bay

*Leading the Way to Port Progress*

John T. Reynolds, Chairman  
Uwe Schulz, Vice Chairman  
Robert A. Herb, Treasurer  
Lisa B. Himber, President  
A. Robert Degen, Esq., Secretary/Solicitor

June 5, 2024

Federal Maritime Commission  
800 North Capitol Street, N.W  
Washington, D.C. 20573

Re: FMC-2023-0016, Request for Information

Ladies and Gentlemen:

The Maritime Exchange for the Delaware River and Bay appreciates the opportunity to comment on the questions related to maritime data accuracy as outlined in the above-referenced docket.

Although the FMC invited public comment from the general public, the questions it poses are very specific to stakeholders listed in the *Federal Register* notice. By asking only specific questions of a very important but incomplete target audience, the Commission is excluding others in the transportation chain that play a valuable role, including but not limited to steamship agents, container examination stations, truck carriers, customs brokers, service providers, and marine exchanges. These entities all contribute to the efficient movement of cargo and vessels; further, few if any of them were invited to participate in the MTDI public meetings.

For example, the Maritime Exchange and similar organizations around the country, collect vessel schedule and real-time movement data and disseminate it to partners in the transportation chain. Our members, including the organizations listed above as well as government authorities, vessel and terminal operators, port authorities, importers and exporters, tug companies, pilots, and many others rely on data brokers like the Exchange because of the many relationships and data sources we have cultivated to provide an accurate common operating picture.

While the questions posed by the FMC will hopefully provide additional insight into accurate data sharing processes, we once again strongly recommend the FMC broaden its outreach and engage with other businesses that also support cargo movement operations to better understand the challenges.

Thank you for the opportunity to present our views.

Sincerely,

Lisa B. Himber  
President