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September 8, 2016

Chief, Section of Administration
 Office of Proceedings
 Surface Transportation Board
 395 E. Street, S.W.
 Washington, DC 20423

RE: Docket Number: ISM 35008
 Transportation & Logistics Council
 Petition for Suspension and Investigation
 NMFC 100-AP Supplement 2



Dear Sir or Madame:

As an admiralty and transportation attorney for the past 40 years, and as President of the Marine and Insurance Claims Association ("MICA") in New York, I would like to express my strongest objection to the changes sought by the National Motor Freight Classification ("NMFC") to the Uniform Straight Bill of Lading.

To shift the burden of proving negligence of the carrier to the shipper, in violation of the Mandate of the Carmack Amendment, is unconscionable and must be defeated. These changes will have a chilling effect on the shipping industry and transportation underwriters.

Very truly yours,


 Daniel G. McDermott

DGM:pf

CERTIFICATE OF SERVICE

The undersigned, Daniel G. McDermott, a Shareholder with the Firm MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN, hereby certifies that on September 15, 2016, a copy of the attached letter was sent *via* e-mail and U.S. mail to the following:

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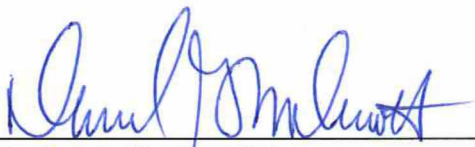
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Dated: New York, New York
September 15, 2016



DANIEL G. McDERMOTT