



# Grand River Navigation Company, Inc.

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U.S. Customs and Border Protection  
Attn: Tracey Denning  
Regulations and Rulings, Office of International Trade  
90 K Street NE 10<sup>th</sup> Floor  
Washington D.C. 20229-1177

June 24, 2014

Re: Docket Number: 1651-0027 Agency Information Collection Activities: Record of Vessel Foreign Repair or Equipment Purchase


Dear Ms. Denning:

Grand River Navigation Company is a provider of bulk freight shipping services throughout the Great Lakes region. Our vessels never leave the Great Lakes Basin; in fact they are prohibited by law from proceeding any further east than Anticosti Island. The bulk of our business is Jones Act Trade (trade between US ports) however; a significant amount of our business is Cross-Lakes trade with Canadian ports, and as a company that benefits from the protection provided by the Jones Act we commend Customs and Border Protection for its effort to ensure cargoes moving between US ports move on US Flagged ships, built in the US, and crewed by US seaman.

Due to the fact that Grand River Navigation trades in both the US and Canada, our vessels often take on ship stores while in a Canadian Port, and when our vessels do so the Master is then required to file CBP Form 226. Although the estimated time given by CBP to fully complete this form is 45 minutes, we find that in order for our company to complete the filing of the form it usually takes between 180 and 200 minutes. More than 4 times the time estimate given by CBP. In fact Grand River Navigation spends approximately 40 man hours a month filing CBP Form 226's for our fleet of 6 Dry Bulk Cargo Vessels, nearly 400 man hours over our 10 month sailing season. An expenditure we believe is a waste of company and governmental resources due to the fact that none of these filings result in duty fees being assessed because of 19 CFR 4.14 (3).

With no duty being collected we fail to understand what benefit is being achieved by the filing of a complete CBP Form 226. We therefore request that CBP either amend the form allowing the master to declare that he took on vessel stores in Canada or Mexico and relieving the company of completing the rest of the required items in order to reduce the costly time requirement for vessel expenditures made in Canada and Mexico, or simply eliminate the use of Form 226 for vessel expenditures subject to declaration and entry, but not duty under 19 CFR 4.14(3).

Thank you,



Michael J Taetsch  
Supervisor; Operations, Safety and Compliance