

Lykes Lines

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August 20, 2001

Mr. Bryant L. VanBrakle
Secretary
Federal Maritime Commission
Room 1046
800 North Capitol Street, N.W.
Washington, D.C. 20573

Re: Federal Maritime Commission Docket No. 01-08, The
Impact Of The Government Paperwork Elimination
Act And The Electronic Signatures In Global And
National Commerce Act

Dear Mr. VanBrakle:

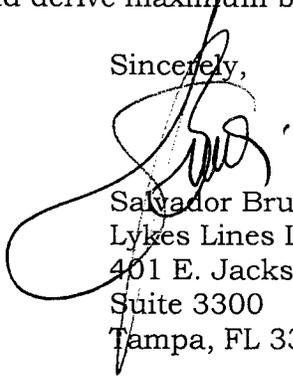
Lykes Lines Limited, LLC ("Lykes") is an ocean common carrier in the foreign commerce in the United States. It hereby submits its comments in the above-referenced proceeding.

As an ocean common carrier, Lykes is party to various agreements for which it is required to provide monitoring report information for all three classes of agreements (A, B and C) to the Federal Maritime Commission. Lykes considers the monitoring reports for Class A and Class B agreements to be highly sensitive because of the revenue information that they include. Monitoring reports for Class C agreements are less sensitive, as they do not include revenue information. Lykes considers the Information Form for Class A/B agreements to be highly sensitive and the Information Form for Class C agreements less so, for the same reasons set forth above.

Lykes believes the FMC should adopt regulations that permit, to the greatest extent possible, the submission of information to the agency by electronic means. In a commercial setting, the electronic transmission of information generally reduces the time and expense associated with the assembly and transmission of that information. Lykes believes that using technology to facilitate such transmission in a regulatory setting would likely result in economies for both the regulatory agency and those it regulates. Accordingly, Lykes supports the FMC's efforts to increase the use of electronic filing.

Lykes has only two concerns with respect to electronic filing. First, as noted above, much of the information Lykes provides to the agency is highly sensitive. The same is true of information provided by other carriers and agreements. Therefore, any electronic filing system must contain safeguards that will protect the confidentiality of sensitive information provided to the Commission. Second, any system should be as simple and user friendly as possible. A complex, highly-technical system that requires significant investment and/or training on the part of users could defeat the purpose of having such a system. Accordingly, Lykes urges the FMC to make any filing system it may adopt as compatible as possible with existing commercial software and hardware systems. This will allow users and the Commission to make maximum use of and derive maximum benefits from the system.

Sincerely,



Salvador Bruno
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