



CARNIVAL
CORPORATION & PLC

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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMM

March 30, 2012

Karen V. Gregory, Secretary
Federal Maritime Commission
800 North Capitol Street, NW
Washington, DC 20573-0001

RE: Docket No. 11-16 Comments on PVO Financial Responsibility by Carnival Corporation & plc

Dear Ms. Gregory:

Carnival Corporation & plc ("Carnival") submits the following comments on the Request for Additional Comments and Information dated February 23, 2012 (the "Request"). These comments are submitted on behalf of 10 cruise brands including, Carnival Cruise Lines, Princess Cruises, Holland America Line, Costa Cruises, Cunard Line and Seabourn Cruise Line, all of which are owned by Carnival. Through these cruise brands, Carnival operates a fleet of 98 ships with an additional 10 cruise ships scheduled for delivery by 2016.

On September 13, 2011, the Commission issued a Notice of Proposed Rulemaking concerning the financial responsibility requirements for nonperformance of passenger vessel service by passenger vessel operators (PVOs). In its Request, the Commission seeks additional information from PVOs to determine the number and extent to which small entity PVOs may be affected by the Proposed Rulemaking.

Neither Carnival nor any of its 10 cruise brands qualify as a small entity under the Regulatory Flexibility Act as amended by the Small Business Regulatory Enforcement Fairness Act (collectively, the "Act"). Carnival and its cruise brands employ over 90,000 persons worldwide. Our brands carried 9.6 million guests on our ships and earned \$16 billion in revenues during 2011. Accordingly, the Commission's review of small entity PVOs under the Act should not include Carnival or its cruise brands. Carnival has no objection to the Commission's review of the economic or competitive impact which the Proposed Rulemaking may have on small entity PVOs and supports the Commission's efforts to mitigate any disproportionate impact such Proposed Rulemaking may have on such PVOs.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

Sincerely,

Carnival Corporation & plc

By: 

Name: David Bernstein

Title: Senior Vice President & Chief Financial Officer