

Royal Caribbean Cruises Ltd.

1050 Caribbean Way
Miami, FL 33132-2096 USA

ORIGINAL

RECEIVED

2012 MAR 30 AM 10:54

tel: 305.539.6000
www.royalcaribbean.com

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMM

CONFIDENTIAL MATERIALS EXCLUDED

March 29, 2012

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

RE: Docket Number 11-16, Royal Caribbean Cruises Ltd. Comments

Dear Ms. Gregory:

I am writing in response to the request for additional comments issued by the Federal Maritime Commission on February 23, 2012. We understand that the FMC is seeking information in order to determine whether passenger vessel operators (PVOs) at Royal Caribbean Cruises Ltd. may be deemed "small entities" under the Regulatory Flexibility Act.

As of December 31, 2011, our company employed approximately 6,300 full-time and 740 part-time employees worldwide in our shoreside operations. We also employed approximately 54,000 shipboard employees. In 2011, we carried over 4.8 million guests; our total revenues were \$7.5 billion; our total expenses (including interest expenses) were \$6.9 billion; and our earnings after taxes were \$607.4 million.

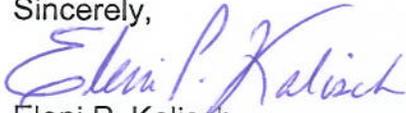
For purposes of FMC financial responsibility requirements, Royal Caribbean Cruises Ltd. is the operator of Royal Caribbean International and Azamara Club Cruises; Celebrity Cruises Inc. is the operator of Celebrity Cruises; and RCL (UK) Ltd. is the operator of one ship in our fleet, *Brilliance of the Seas*.

Because *Brilliance of the Seas* is embarking passengers in US ports, its operator, RCL (UK) Ltd., has also complied with the FMC's financial responsibility requirements. Although RCL (UK) Ltd. has fewer than 500 employees and would, therefore, qualify under the FMC guidelines as a small entity, its compliance with the FMC's financial responsibility requirements is performed for the most part using the same resources that are used by our other larger PVOs. As a result, we do not anticipate an appreciable economic impact (beyond the higher bond threshold amounts).

The attached chart reflects the total costs for compliance with the FMC financial responsibility requirements as well as projected costs if the proposed rule becomes effective.

Please feel free to contact me at 305-539-6799 if you require additional information.

Sincerely,



Eleni P. Kalisch
Vice President
Federal Government Relations