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November 21, 2011

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

RE: Docket Number 11-16, Comments on PVO Financial Responsibility

Dear Ms. Gregory:

Pursuant to the Notice of Proposed Rulemaking published by the Federal Maritime Commission on September 20, 2011 (Docket Number 11-16), I submit the following comments on behalf of Royal Caribbean Cruises Ltd.

As a member of the Cruise Lines International Association (CLIA), Royal Caribbean Cruises Ltd. supports the comments submitted by CLIA.

In addition, RCL would like to submit for the record its support of the Commission's proposal to consider providing relief from full coverage requirements to smaller Passenger Vessel Operators (PVOs) when the PVO submits evidence of additional protections. We believe that this approach will address the undue burden currently placed on the smaller cruise lines.

Thank you for the opportunity to respond to the Commission's Notice of Proposed Rulemaking. If you have additional questions or require additional information, please do not hesitate to contact me.

Sincerely,



Eleni P. Kalisch
Vice President
Federal Government Relations