



RECEIVED

2011 DEC 30 PM 3:09

OFFICE OF THE SECRETARY

December 20, 2011

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

Subject: Docket No. 11-19, *U.S. Containerized Cargo Flows – Response to NOI*

Dear Madam Secretary:

The Canadian International Freight Forwarders Association (CIFFA) is submitting these comments in response to the Federal Maritime Commission's Notice of Inquiry on factors that may cause or contribute to the decision to route cargo destined for the U.S. inland via Canadian and Mexican seaports rather than via U.S. seaports.

CIFFA represents some 250 Regular Member firms from the largest of global multi-national freight forwarding firms to small and medium sized companies. CIFFA Member companies employ tens of thousands of highly skilled international trade and transportation specialists. As a vital component of North America's global supply chains, CIFFA forwarders facilitate the movement of goods around the world on behalf of customers located everywhere in the world.

The ability to choose from among a variety of North American ports is essential to the success of any company that relies on international trade for its success. While freight forwarders arrange import and export cargo via U.S. seaports, we also use seaports in Canada to serve customers in both countries. Our ability to utilize any seaports for our customers' U.S.-destined/U.S.-originated cargo strengthens the ability of American companies to compete in the global marketplace.

With respect to the decision to utilize Canadian seaports – or any seaport, decisions are made for a number of business reasons, including:

- The stability of the labour situation in any given port/ rail connection
- Flexibility in ocean carrier selection and speed of transit from origin through to final North American destination.
- Access to rail connections through to destination and availability of equipment
- Port and dock congestion / delays
- One other aspect of a customer's routing decision may be the publication by Journal of Commerce in the Piers Report (and others) of sensitive commercial data from the bill of lading with every shipment in and out of a US port. These data are not made public when cargo is routed via a Canadian seaport.

These exact same reasons apply when Member firms choose to use U.S. seaports for the thousands of Canada-destined/Canada-originated containers routed via the United States. The cost of the U.S. Harbor Maintenance Tax is just one factor in making port choices.

Thank you for the opportunity to comment on this important issue. Please include this letter in the public docket for this proceeding.

Sincerely,
CIFFA



H. Ruth Snowden
Executive Director