

MMA
Metropolitan Milwaukee
Association of Commerce

December 15, 2011

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

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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

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

Dear Madam Secretary:

The Metropolitan Milwaukee Association of Commerce (MMAC) is submitting these comments in response to the Federal Maritime Commission's Notice of Inquiry on factors that may cause or contribute to the shift of cargo destined for the U.S. inland from U.S. to Canadian and Mexican seaports.

The MMAC represents nearly 1800 member businesses, employing more than 300,000 workers throughout the metropolitan Milwaukee area. We are also a founding partner of Milwaukee 7, the regional economic development organization for Southeastern Wisconsin. While our membership is comprised of a diverse group of businesses and manufacturers, our regional strength has been and continues to be manufacturing. Our ability to make things here and move those products around the country and around the globe efficiently is key to the continued economic growth of our region.

Trade between the United States and Canada, as well as the ability to choose from among a variety of North American ports for imports and exports, are essential to the success of the businesses we represent. Wisconsin sells more to Canada than it does to its next six export markets combined. Nearly a third of all Wisconsin foreign-bound goods are sold to Canada and that figure does not include Wisconsin produced goods that pass through Canadian ports destined for other foreign markets. In addition, there are an estimated 156,500 jobs in Wisconsin that depend on Canada-Wisconsin trade. P&H Mining in Milwaukee and Caterpillar in Oak Creek are major suppliers for mining and oil sands activities in Canada. We therefore caution the FMC against making any recommendations that could drive up costs for Milwaukee area businesses and reduce our shipping choices.

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

Sincerely,



Steve Baas
Vice President for Government Affairs
Metropolitan Milwaukee Association of Commerce

