



January 13, 2012

Hon. Karen V. Gregory, Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573-0001

RE: *Comments in Response to the November 8, 2011 Notice of Inquiry Regarding U.S. Inland Containerized Cargo Moving Through Canadian and Mexican Seaports*

Dear Secretary Gregory:

The Public Border Operators Association (PBOA) appreciates this opportunity to submit comments in response to the Federal Maritime Commission's (FMC) notice of inquiry regarding the movement of U.S. originating or U.S. destined cargo through seaports in Canada or Mexico.

The PBOA is a binational membership organization representing the publicly owned and operated international bridge and tunnel crossings between the Province of Ontario and the States of Michigan and New York. Together our member organizations facilitate the annual movement of over \$365 billion dollars of trade between the U.S. and Canada, with service to approximately 28 million vehicles, including 24 million automobiles and almost 4 million trucks/commercial carriers annually. These impressive figures consist of goods and travelers from nearly every province and all 50 states.

One of the preeminent missions of the PBOA is to assist the U.S. and Canadian governments with the development and implementation of smart border policies that speed the flow of people and goods across our shared border. And as North American economic vitality is one of our organization's primary objectives, we are extremely attentive to any additional taxes or proposed regulations that could have a detrimental impact or stifling effect on the movement of legitimate commerce across our member crossings.

Recently, Prime Minister Stephan Harper and President Barack Obama unveiled the Beyond the Border (BTB) Accord, which is a dynamic initiative to further strengthen Can-Am relations, increase trade between the nations, reduce regulatory "red-tape" that burdens economic growth, and eliminate barriers between a more integrated binational relationship. The PBOA is a staunch supporter of the BTB and therefore opposes any new border fees that contradict this comprehensive plan.

New trade-killing border taxes to make up for "lost" HMT revenues would harm U.S. businesses, consumers, and border communities by raising costs and subverting North America's global economic competitiveness.

We believe that the natural, geographic advantages and efficient transportation systems will always make the use of Canadian ports and accessible border crossings gateways attractive. Shippers would benefit from the reduction of fees and administrative burdens associated with the use of U.S. ports while relying on border infrastructure that is surely up to the challenge.

Blue Water Bridge
Authority

Buffalo & Fort Erie
Public Bridge Authority

Detroit & Canada
Tunnel Corporation

Joint International
Bridge Authority

Michigan DOT

Niagara Falls Bridge
Commission

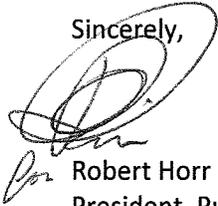
Ogdensburg Bridge &
Port Authority

Seaway International Bridge
Corporation

Thousand Island Bridge
Authority

The PBOA appreciates this opportunity to comment on Federal Maritime Commission's Notice of Inquiry and encourages you to recognize the importance of vibrant Can-Am border crossings as you deliberate on the implementation of additional regulatory tax burdens for shippers.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Horr", is written over the word "Sincerely,".

Robert Horr
President, Public Border Operators Association

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