



January 9, 2012

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

via email: [Secretary@fmc.gov](mailto:Secretary@fmc.gov)

RE: FMC Inquiry into U.S. inland containerized cargo moving through Canadian and Mexican Seaports – Response to NOI issued November 3<sup>rd</sup>, 2011 (Docket No 11-19)

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Dear Ms. Gregory:

The Shipping Federation of Canada (“the Federation”), incorporated in 1903, represents the owners, operators and agents of the ocean ships that call Canadian ports. These ships, which carry international trade also call ports throughout the world including those of the United States (where liner shipowners and operators are represented by the World Shipping Council). In other words, our members are global vessel-operating common carriers serving Canada, the United States and Mexico – amongst others.

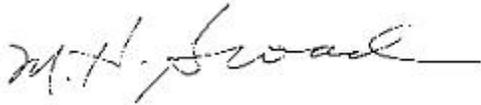
The Federation appreciates the opportunity to offer comments on the Federal Maritime Commission’s (FMC) Notice of Inquiry (NOI) requesting views and information regarding factors that may cause or contribute to the shift of containerized cargo destined for U.S. ports to Canadian or Mexican seaports.

In view of the huge number of submissions and comments already filed with the FMC in this Inquiry, the Federation will limit itself to the following comments:

- **With respect to factors that affect port selection for U.S. destined cargo**, the Federation endorses the *Joint Comments Submitted by World Shipping Council, the National Industrial Transportation League, and the National Retail Federation*, filed on December 21, 2011.
- **With respect to the description and governance of the Canadian transportation system** (including its security dimension), the Federation endorses the description provided in the *Official Comments of the Government of Canada*, filed by the Embassy of Canada on December 22, 2011.

- **With respect to the existence of a diversion of cargo through Canadian ports,** Federation members have not, on the aggregate, experienced any “shift” of containerized cargo destined for U.S. interior to Canadian (vs. U.S.) seaports, although a small portion of U.S. destined cargo has always entered the continent via Canadian seaports. More detailed data in this respect can be found in the *Official Comments of the Government of Canada* mentioned above.

Thank you again for the opportunity to submit comments. Please do not hesitate to contact the undersigned should require any additional information.

A handwritten signature in black ink, appearing to read "M. H. Broad", with a horizontal line extending to the right.

Michael Broad  
President