



2<sup>nd</sup> March 2012

Karen V. Gregory  
Secretary  
Federal Maritime Commission  
800 North Capitol Street NW  
Room 1046  
Washington D.C. 20573-0001  
U.S.A.

Dear Ms. Gregory

“Docket No. 11-22 Comments on NVOCC Negotiated Rate Arrangements”

We refer to the FMC Notice of Inquiry issued on December 20<sup>th</sup> 2011. The British International Freight Association (BIFA) wishes for the following comments to be considered by the Federal Maritime Commission (FMC). We also enclose a copy of a letter we wrote on this issue in May 2010.

BIFA is the prime Trade Association for UK Freight Forwarders that move goods internationally. Many BIFA members act as NVOCCs and have existing FMC bonds. Full details of our role and can be found at our website [www.bifa.org](http://www.bifa.org)

We understand that industry views are sought on simplification of the existing limited exemption so it will receive more widespread acceptance and use. BIFA supports equal treatment for all NVOCCs so they are permitted to use the exemption whether or not they are licensed by the FMC. It is our view that the FMC can always revoke the exemption for any company found to be abusing it and we therefore support expansion of the exemption.

Yours sincerely

British International Freight Association (BIFA)  
Robert Keen  
Executive Director