



RECEIVED

2011 MAR -9 PM 11:12

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

March 8, 2012

Karen V. Gregory, Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573-001
(Secretary@fmc.gov)

**Re: December 20, 2011 Notify of Inquiry; Non-Vessel-Operating Common Carrier
Negotiated Rate Arrangements; Tariff Filing Exemption**

Dear Ms. Gregory:

CEVA Freight, LLC (CEVA), a licensed ocean transportation intermediary that acts as both a non-vessel operating common carrier (NVOCC) and ocean freight forwarder, hereby submits its comments in response to the FMC's December 20, 2011 Notice of Inquiry. As such it is directly interested in and affected by Federal Maritime Commission regulations governing ocean transportation intermediaries.

CEVA is based in Houston, TX and provides transportation, supply chain management, and information services in the United States and internationally. It is part of the CEVA Group Plc, one of the world's leading logistics companies which has more than 50,000 employees and operates a global network with facilities in more than 170 countries.

CEVA is not opposed to a revision to FMC regulations that would extend use of Negotiated Rate Agreements (NRAs) to unlicensed, foreign-based NVOCCs. CEVA believes that NRAs do not pose any greater regulatory or financial risk to shippers than shipping under an NVOCC's tariff or a NVOCC Service Agreement, both of which are presently used by foreign-based NVOCCs. Foreign-based NVOCCs post a greater financial security with the FMC than do licensed NVOCCs, and are subject to the FMC's jurisdiction. Accordingly, there appears to be little or no risk to shippers and adequate protection against any risk that may exist. Moreover, allowing NRAs to be offered by foreign NVOCCs will increase competition and service options for U.S. shippers and consignees.

For the above reasons, CEVA would support permitting unlicensed foreign-based NVOCCs to offer NRAs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. Doyle".

CEVA FREIGHT, LLC
Ronald M. Doyle
Vice President – Qualifying Individual