

From: John Abisch [mailto:jabisch@econocaribe.com]
Sent: Thursday, February 23, 2012 3:12 PM
To: Secretary
Cc: egreenberg@gkgllaw.com
Subject: Docket No. 11-22, Negotiated Rate Arrangements -- Response to NOI

Dear Ms Karen V, Gregory,

As the president of Econocaribe Consolidators Inc. (FMC bond 16318N) I would like to thank the FMC for your consideration to reduce the administrative burden placed on NVO's due to tariff filing. I believe it is clear that the shipping public does not utilize this publically accessible document. With the NVO market being so competitive, with their being so many licensed NVO operating, there is no need to be concerned about price fixing or other issues which perhaps were the catalyst for tariff filing. Please keep in mind unlike the vessel operators, the NVO never had anti-trust immunity thus were never much of a risk for price fixing /discrimination. To be clear, I am in favor of the current requirement for an OTI license, as well as a bond. I even would support if the qualifying individual (of which I am for Econocaribe) had to tested periodically to prove our competence to operate as an OTI.

I applaud the efforts of the commission in creating the NRA, yet I believe this has had little impact on reducing the administrative burden to the NVO. I am suggesting the commission consider the full elimination of tariff filing. I am confident this reduction in administration will not negatively impact the shipping public and will reduce the administrative burden and cost to the NVO. I would also like to suggest the elimination of the tariff filing be for all NVO's (not just USA licensed). As a USA licensed OTI, I do not believe it is fair for the foreign OTI to have a different requirement for tariff filing. In addition to having an issue with my feeling that this is unfair, I also have a strong concern that by a USA agency imposing a more difficult requirement upon a foreign NVO, we significantly increase the possibility of a foreign government retaliating and imposing additional regulations upon the USA OTI.

I appreciate your consideration of my views and am available to speak with you at your convenience.

I declare under penalty of perjury that I have read the foregoing and it is true and correct to the best of my knowledge, information and belief.

Best Regards,

John Abisch – President
Econocaribe Consolidators
305 693-5133 ext 3320
International Transportation Specialist since 1968
www.econocaribe.com

Our family mission is to provide a high quality service and foster an enriching and rewarding environment through commitment, integrity, accountability and continuous improvement.

This email is solely for the intended recipient. If you are not the intended recipient, then any copying or redistributing of this email is strictly prohibited. If you receive this message in error, then you should immediately notify the sender by telephone or return email and then delete it from your computer. Any views or opinions expressed in this email are not necessarily those of Econocaribe Consolidators Inc.