

# FIATA

Schaffhauserstrasse 104, P.O. Box 364, CH-8152 Glattbrugg, Switzerland  
Tel. +41 (0)43 211 65 00, Fax +41 (0)43 211 65 65  
E-Mail [info@fiata.com](mailto:info@fiata.com), Internet <http://www.fiata.com>



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

Glattbrugg / Switzerland, 22 March 2012

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

Dear Ms Gregory

We refer to the FMC Notice of Inquiry issued on December 20<sup>th</sup> 2011. The International Federation of Freight Forwarders Associations (FIATA) wishes that the following comments are considered by the Federal Maritime Commission (FMC).

The International Federation of Freight Forwarders Associations (FIATA) is the largest and leading non-governmental organization in the field of transportation, representing 40'000 forwarding and logistics companies employing up to 10 million people in 150 countries. FIATA has consultative status with several United Nations bodies and is recognized by many governmental and private organizations worldwide. The Federation's main objectives are to promote and protect the interests of the freight forwarding industry, to improve the quality of freight forwarding services, to assist with vocational training and to familiarize the business world in particular and the public in general with the wide range services rendered by the industry. Many of the FIATA member companies are engaged in maritime transportation and are acting as a NVOCC.

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We understand that industry views are sought on simplification of the existing limited exemption so that it will receive more widespread acceptance and use.

FIATA supports equal treatment for all NVOCC so that 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.

A NVOCC not using the exemption has the expense of maintaining tariff publication with no offsetting benefit to the shipping public. Furthermore such data can be seen by third parties whilst an NVOCC using a Negotiated Rate Agreement can keep rate information confidential. FIATA takes the view that this difference should be resolved by expanding the scope of the exemption; we would be grateful that our views are taken into consideration.

Yours sincerely,

FIATA

A handwritten signature in black ink, appearing to read "J. Gillespie".

Mr Christopher J. Gillespie  
Chairman of the Multimodal Transport Institute



*the global voice of  
freight logistics*