



**THUNDERBOLT**  
Global Logistics, LLC

Electronic comment

March 23, 2012

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

Subject: Docket No. 11-22, Negotiated Rate Arrangements - - Response to NOI

Thunderbolt Global Logistics, LLC is a small freight forwarder with one office in Baltimore, MD. We have a total of 11 employees. We want to thank the FMC for providing NRAs to our industry.

Our company has not begun to use the NRA for a variety of reasons. I'll outline some of the reasons why we are not using them.

We are not 100% sure of what the regulation requires. The recordkeeping requirement seems difficult to comply with since so much communication with our clients or agents is by e-mail.

Rates constantly change in the marketplace due to increases in fuel and general market conditions. If fuel surcharges go up on a weekly basis then it's a cumbersome process to create a new NRA.

When we quote a U.S. based client we are not always receiving a response that includes their name and title. Some of our day to day contacts don't even have a title.

We also quote a significant number of overseas agents. We quote them the actual cost (no mark up) and when they respond affirmatively they give us the "sell rate" which includes the mark up on the freight. We would then have to send them another document titled NRA and request that they respond to it in writing. The U.S. exporter does not pay the freight charges so they would not be involved in the rate negotiation process.

The requirement to add language about the NRA on bills of lading is hard to implement, especially when not all of our shipments move under a quotation let alone an NRA.

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OTI #021287NF



We would like to see the NRA broadened so that we don't have to have a constant back and forth with our client. It would save our company significant money and free up our operational staff if the process was easier.

Until the rule is simplified we will continue to file rates using our tariff service at a considerable cost for a company our size.

My hope is that changes will be made so we can utilize the NRA.

Sincerely

Jim Shapiro  
Director

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