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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

BEFORE THE
FEDERAL MARITIME COMMISSION

FMC Docket no. 11-22
Notice of Proposed Rulemaking
NVOCC Negotiated Rate Arrangements – Tariff filing exemption

Comments
Submitted by

FEDESPEDI
FEDERAZIONE NAZIONALE DELLE IMPRESE
DI SPEDIZIONI INTERNAZIONALI

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Piero Ugo Lazzeri
President
April 23rd, 2013

Fedespedit – Federazione Nazionale delle Imprese di Spedizioni Internazionali – submits these comments on Docket no. 11-22 as a follow up of the previous comments made on the same subject.

WHO IS FEDESPEDI

Established in June 1946, FEDESPEDI - Federazione Nazionale delle Imprese di Spedizioni Internazionali - is the Federation of the Italian Freight Forwarding companies.

Fedespedit currently is the trade association in the field of transport representing and safeguarding the interests of almost all international freight forwarders in Italy.

Our members are engaged in the national and international movement of freight by all modes of transport (road, rail, sea, air), having deep knowledge and professionalism within the supply chain and a natural vocation towards internationalization.

Most of our members are referred to as “Multimodal Transport Operators” or “Logistics Service Providers”: stakeholders which are able to plan, deal with and safeguard the whole freight forwarding business and to take care of the interests of their customers, providing a considerable role within the Italian economic system.

FEDESPEDI NUMBERS

Fedespedit represents about 2.200 companies, employing directly more than 80.000 individuals and 100.000 as an industry. Fedespedit members are located throughout Italy, producing a turnover of about 20 billions €.

At international level Fedespedit is a member of:

- Clecat (Comité de Liaison Européen des Commissionnaires et Auxiliaires de Transport) which is the European Association for forwarding, transport, logistic and customs services
- Fiata (Fédération Internationale des Associations de Transitaires et Assimilés) which is the world organization of the freight forwarding community.

FEDESPEDI MISSION

Our Federation, in brief, has the mission to:

- Promote the knowledge, the analysis and the solution of problems concerning the freight forwarding industry, so as to improve efficiency and profitability;
- Create and maintain appropriate connections with national, foreign and international bodies;



- Represent members in the relationships with national, regional or local authorities or with private institutions;
- Safeguard the nature of the freight forwarding activity and promote and improve it;
- Safeguard the interests of the industry in the legislative and regulatory field, as well as in social, economical, financial, union, fiscal and insurance areas;
- Promote publications, debates, conferences, training courses and seminars.

WHY WE SUBMIT COMMENTS

Fedespedi already supported the actions taken in the past by other “sister associations”, such as TIA, as well as that of our world federation - FIATA -, in order to assist our members who are engaged in daily business with the US.

Fedespedi welcomes the proposed rulemaking because we do retain that the current situation is discriminatory, while granting the exemption to foreign-based, unlicensed NVOCCs will contribute to a level playing field and, at the same time, will reduce operating costs for our members, allowing them to concentrate on quality and price, rather than expending unnecessary time and money on administrative compliance.

For the reasons set forth above, Fedespedi appreciates the liberalization proposed and asks the Commission to consider its comments.

Respectfully submitted.



Piero Ugo Lazzeri
President

