

Secretary

From: lisaw@bdginternational.com
Sent: Wednesday, May 16, 2012 6:41 PM
To: Secretary
Subject: commets to docket no 12-05 * UPDATED

Dear Secretary Gregory,

BDG International Inc. is an NVOCC and FMC freight forwarder. Our key business is providing services directly to shippers for the movement of individual shipments. It is our goal to provide service with integrity as per our mission statement.

With the changes in the economy and service requirements we are proving a new quotation to our customers per shipment as well as having to file a new tariff line each shipment. The labor and cost of filing individual tariffs is an overwhelming expense that can not be re-couped from the client nor from any source. This is a cost that we have to bear.

The purpose of the tariff filing or NSA or NRA does not benefit our clients. Due to there being no benefit to BDG or our clients we have choosen not to pusue the NSA option.

We would like to recommend to the following changes to the FMC tariff filing:

1. Maintain the licensing and bonding requirements for an NVOCC
2. Maintain the requirement for filing the rules in a public format
3. Abolish the requirement for filing tariff rates or NSA or NRA of any type.

Please let us know if you have any questions regarding our comments.

Thank you,

Lisa Victoria Waller, CHB
Vice President

BDG International, Inc.
840 Tollgate Road
Elgin, IL 60123

Tel: 847-760-0014
Cell: 630-776-5648
Fax: 847-760-0045
email: lisaw@bdginternational.com
skype: lisa.victoria.waller

www.bdginternational.com

BDG International (India) Pvt. Ltd.
D-78, Malviya Nagar, First Floor
New Delhi -110017, India

Tel. +91 11 2667 7509, 4101 2974

Quotations as to fees, rates of duty, freight charges, insurance premiums or other charges given by BDG International, Inc. (BDG), to the Customer are for informational purposes only and are subject to change without notice; no quotation shall be binding upon the company unless the company in writing agrees to undertake the handling or transportation of the specific rate or amount set forth in the quotation and payment arrangements are agreed to between the BDG and the Customer.