

Karen V. Gregory, Secretary
Federal Maritime Commission
800 North Capitol Street, N.W. Room 1046
Washington, D.C. 20573-0001

Re: DOCKET NO. 12-07, NOTICE OF INQUIRY

SOLICITATION OF VIEWS ON REQUESTS TO DEVELOP AND RELEASE CONTAINER FREIGHT RATE INDICES FOR U.S. AGRICULTURAL EXPORTS BASED ON A SAMPLING OF SERVICE CONTRACTS FILED WITH THE FMC

Dear Ms. Gregory,

Please accept the request of the Agriculture Transportation Coalition for additional time to survey our membership as to the important issues addressed in the above Notice of Inquiry.

The AgTC has been identified by leading maritime trade publication as “the principal voice of agricultural exporters in US transportation policy.” The AgTC’s membership includes companies that represent virtually all agriculture products and many forest products exported from the United States. These products are grown, raised, processed, packaged and shipped from all regions of the US, to all markets worldwide, where they typically face competition from similar products sourced elsewhere.

Transportation constitutes a substantial component of the total landed cost of US agriculture and forest products, and thus plays a critical role in determining the competitiveness of our US exports in foreign markets. The AgTC lauds the Commission for its interest in the competitiveness of US exports, and for seeking ways, within its authority, to further assist US exporters. We believe the Commission deserves recognition for its proactive initiative towards this objective, consistent with both the President’s and Congress’ focus on export growth.

The development of mechanisms that will provide an additional transportation pricing tool is of utmost interest to our membership, the agriculture and forest products exporters. Our members sign service contracts, which are filed by the ocean carriers and/or nvoc’s at the Federal Maritime Commission. The subject of the Notice of Inquiry -- how the Commission might access the terms of those contracts and organize the information while honoring the confidentiality of each contract’s terms, for the purpose of providing a means for US exporters to better understand pricing in the various trade lanes, deserves serious consideration.

In light of the complexity of the issues raised, and the importance of the objective of assisting US exporters gain better understanding of transportation pricing, we respectfully request an extension in the Comment Period, for 30 days, to August 8, 2012.

Respectfully Submitted,

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