



March 30, 2016

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

Subject: Docket 16-05,
[CEVA Freight LLC as agents for and on behalf of Pyramid Lines]

Dear Ms Gregory:

As a response to the Advanced Notice of Proposed Rulemaking regarding service contracts and NVOCC service Arrangements (NSA) issued by Federal Maritime Commission (FMC) on the 25th of February 2016, CEVA Freight LLC as agents for and on behalf of Pyramid Lines Limited (“Pyramid Lines”) would like to provide you with our comments regarding the various proposals to make filing of service contracts and NSAs easier for carriers and NVOCCs.

Specifically, we would wish to address the following points:

1. Our customer’s commercial expectation of having NSA amendments available as soon as the Shipper signs it, thus their interpretation that the exact FMC filing date is not necessarily essential.
2. Moreover, it is our understanding that the current amendment filing process can cause delays in having the amended terms available for immediate use and that this would be improved if the regulatory change was adopted.

As the exclusive agent and affiliate of Pyramid Lines (foreign registered NVOCC), we support the principle of allowing:

1. NVOCCs the flexibility in filing amendments so that the regulatory process does not delay the implementation of commercial agreements. Thus, we see no downside in having FMC provide such flexibility.
2. Additionally, we give our support in permitting carriers and NVOCCs in filing multiple service contracts and NSA amendments signed over a 30-day period in a single filing.

As a member of a fast moving and dynamic international ocean shipping industry, we would like to highlight the need for eliminating unnecessary regulatory bottlenecks and welcome in making this marketplace operate efficiently with a minimum government intervention.



In addition, we would like to point out that NVOCCs do not have antitrust immunity. Therefore, there should be no need for them to file NSAs with the FMC. It is our opinion that if FMC has a need to review an NSA for regulatory purposes, it can mandate that all NSAs be maintained in the NVOCCs file for a certain period of time so they can be made available to the FMC upon request.

Finally, we would like FMC to seriously deliberate taking steps to further liberalize the process for entering into Negotiated Rate Arrangements (NRAs) between NVOCCs and their customers. In particular, the prohibition of amendments to NRAs is, we believe inhibiting their effectiveness as a commercial tool for NVOCCs and their customers to use.

We thank you for any consideration you can provide in this matter. If there is any questions please contact me at 512-356-1774 or by email Che.Rollings@Cevalogistics.com.

Sincerely,

A handwritten signature in blue ink that reads "Maria Che Rollings".

Maria Che Rollings
Global Head of NVOCC Management
CEVA Freight LLC
As agents for and on behalf of Pyramid Lines