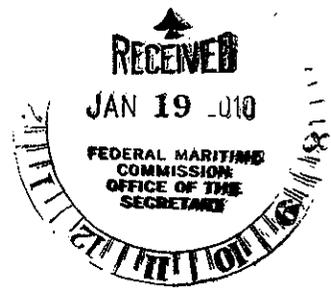


ORIGINAL



“Around The World  
Around The Clock”



cc: OS  
EC  
Comm (4)  
O/S  
DCC  
BTA  
BOE  
Pub

3 Northway Lane  
Latham, NY 12110  
TEL: 518-785-6000  
800-493-9444  
FAX: 518-785-6239

Supporting Statement to the NCBFAA Petition

My name is Allison Burak and I am the NVOCC Manager at Trans-Border Global Freight Systems, Inc. We have previously submitted a verified statement in support of the NCBFAA Petition to eliminate the requirement for mandatory publication of ocean rate tariffs.

It is more important today, than ever, to eliminate the requirement. Due to the unstable economy we are faced with, carriers continuously raise and lower their rates to compensate for the inconsistent demand. This results in carrier's implementing GRI's, BAF & CAF increases, and most recently an ERC. For every increase, a new or revised filing must be completed. It must be done for each type of container (20', 40' & 40'HC) which at least triples the amount of filings that must be amended. Each amendment is \$5. In 2009, filings alone cost Trans-Border just under \$6,500.00. This does not include the labor internally to monitor and modify these filings.

If the shipper's utilized the tariff rates it would be beneficial to our trade, however, shipper's come directly to us and request rate quotes be submitted in writing on a case by case basis. The additional procedure of then having to file a tariff and continuously monitor those rates is time consuming and financially burdensome for something that is not being utilized.

Executed on January 18<sup>th</sup>, 2010

**Trans-Border Global Freight Systems, Inc.**

\* Import \* Export \* Air \* Ocean \* US Customs Brokerage \* Domestic \* 24 Hours A Day / 7 Days A Week \* No  
Size Or Weight Restrictions