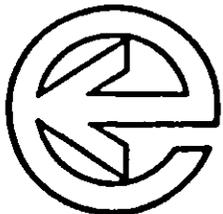


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ECONOCARIBE CONSOLIDATORS, INC.

INTERNATIONAL TRANSPORTATION SPECIALISTS

May 20, 2010

Ref: Docket No. 10-03, Comments on NVOCC Negotiated Rate Arrangements

To Whom it may concern,

I, John Abisch, am the president of Econocaribe Consolidators Inc., whom operate under FMC license No. 16318N. On behalf of Econocaribe and really the entire NVO industry, I would like to thank you for your consideration of the comments I filed on behalf of Econocaribe and many other NVO's filed to support this exemption to tariff filing.

I would like to reiterate my belief in the benefit to the NVO industry (without sacrifice to the shipping public) if you grant this exemption. The publically accessible tariffs are not utilized by the shipping public. In all the years Econocaribe has had our rates publically accessible the only organization to ever request to view our rates has been the FMC. I believe all parties (perhaps not the tariff filing organizations) involved in the movement of international ocean cargo are comfortable with the idea to have rates memorialized in writing directly between the parties, with email being the primary tool used to show an offer and acceptance of a rate. Should this exemption be granted, it will benefit Econocaribe and the entire international shipping community. The primary benefit being the reduced administrative cost to publically file the ocean freight rates.

I suggest this exemption by for all lawful NVO's, including foreign registered NVO's, not just licensed companies. It is my concern that if the regulation benefits USA licensed NVO's (which Econocaribe is one) over foreign registered NVO's there may be retaliation by other countries. Of particular concern is China and the regulatory action they may take against US licensed NVO's if unjustified burdens were left on the registered NVO's.

I believe the rates should be able to be quickly and easily adjusted between parties as long as they are memorialized in writing by the parties.

Your consideration to consider this exemption will benefit the industry and the USA.

I declare under the penalty of perjury that I have read the foregoing and it is true and correct to best of my knowledge, information and belief

John Abisch – President  
Econocaribe Consolidators, Inc.



Winner of the President's "E" Award for Excellence for Exporting

FMC LIC. 16318N