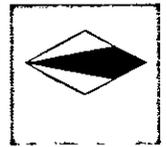


Balguerrie



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Federal Maritime Commission
800 North Capitol Street, N.W.
Washington DC 20573-0001
United States of America

For the attention of the Secretary

O/Ref. :JMB/cvh

Bordeaux, 1st June 2010

Ref : Docket N° 10-03, NVOCC Negotiated Rate Arrangements:

Dear Sir or Madam,

Our entity, entitled "Alfred Balguerrie S.A. – Transo", is a French O.T.I. / N.V.O.C.C. We have previously submitted comments in support of NCBFAA's exemption petition.

We would like to thank the FMC for having taken note of our comments and granting exemption from filing for OTI/NVOCCs in the proposed rule.

The exemption from tariff filing will relieve OTI/NVOCCs from a burden which has proved both unnecessary and costly. The primary reasons for our request are that:

- the tariff is never consulted by our customers
- the unstable shipping market and the constant introduction of new surcharges has dramatically increased the amount of filing needed to reflect all of these changes
- the cost of filing is high for small and medium sized companies who are fighting to survive in extremely difficult economic conditions. The procedure is also time consuming for our employees.

We totally support the proposed rule for the above reasons but consider that this exemption should also apply to foreign registered NVOCCS who are not eligible for an FMC license but who are subject to the same problems as licensed NVOCCs.

We confirm that any rates which are negotiated with our customers are confirmed in writing with an official quotation. This is standard working procedure for our company. We could change our quotation document in our computer system to include an additional comment indicating that the exempt rates (the Negotiated Rate Agreements or NRAs) are subject to the company's rule tariff and add indications on how this tariff can be accessed. Free access would be given to our rules tariff.

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

Sincerely yours,

Jean-Michel BAILLET

Directeur

Alfred Balguerrie S.A. – Transo, Bordeaux - France

Conditions générales TLF

