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August 14, 2003

Honorable Bryant L. Van Brakle
Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573



RE: Petition of National Customs Brokers and Forwarders
Association of America, Inc. for a Limited Exemption From
Certain Tariff Requirements of the Shipping Act of 1984

Petition No. 03 -

Dear Secretary Van Brakle,

I want to take this opportunity to introduce myself, and the organization I represent. I am Joe Pinto, Manager of Global Logistics.

JLG Industries, Inc, (JLG) is the world's leading producer of mobile aerial work platforms and a leading producer of telescopic material handlers and telescopic hydraulic excavators marketed under the JLG and **Gradall** trademarks. Sales are made principally to rental companies and distributors that rent and sell the companies products to a diverse customer base, which include users in the industrial, commercial, institutional and construction markets. JLG has five manufacturing and assembly facilities in Pennsylvania, Ohio and Belgium with sales and service locations on **SIX continents**.

JLG imports and exports finished goods, parts and raw material globally. Occasionally, we will use the services of an NVOCC for the following purposes:

- 1) The need to have less-than-container load shipments consolidated
- 2) Then **ability** to provide complete logistical services from origin to destination
- 3) Occasionally better rates can be obtained from an NVOCC than directly from the steamship lines
- 4) Expertise in handling import/export documentation **and** other services ancillary to transportation
- 5) Their ability to provide a broad range of service **to/from** numerous origins and destinations

We will not normally select the NVOCC based on the rates contained in the NVOCC tariff.

We support the proposed exemption because tariffs appear to have no use for the company and appear to be a needless administrative expense for the NVOCC. Furthermore, a cost reduction for NVOCC could translate into lower rates and JLG prefers to negotiate with its suppliers rather than rely on a fixed price list such as a tariff.

I, Joe Pinto declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Joe Pinto, Manager, Global Logistics