

Hanseatic CONTAINER LINE LTD.

June 4, 2010

Federal Maritime Commission
800 North Capitol Street, NW
Room 1046
Washington, D.C. 20573-0001

RE: Docket No. 10-03 comments on NVOCC Negotiated Rate Arrangements

Commissioners:

I am Debbie Geiger, Manager of Export Compliance and Seafreight Processes for Hanseatic Container Line Ltd., OTI license number 12341N and its parent company, Mid-America Overseas, Inc., OTI license number 1872F.

In response to the NCBFAA Petition, we submitted comments on Docket No. P1-08 Verified Supporting Statement. We thank the Commission for considering all comments received and appreciate granting of the exemption that was requested.

As verified in our original comments, none of our shipper clients use our tariff to obtain rates. Each of our clients moves unique cargo. Because they often request that we quote to and/or from door, we must obtain inland rates from truckers and combine them with the rates purchased from the ocean carriers to create a rate specifically for movement of their cargo. Furthermore, rates and surcharges from the carriers change so frequently that rate validity is not more than 30 days. Rates are not filed in our tariff until the shipper has confirmed that they will utilize our services. Consequently, rates are filed in our tariff prior to shipment but not until after the shipper has agreed to them.

Most shippers do not have any experience or knowledge of how to navigate a tariff. Therefore, for good order's sake and to avoid any misunderstanding, we memorialize in writing all rates negotiated with our clients. We have a company procedure in place already as to what information should be included in a quote. All documents that we produce include our terms and conditions and/or refer our clients to our website, where they are also available in full. It would be very easy for us to put our rules tariff on our company website and include verbiage in negotiated rate arrangements indicating their location.

Particularly in view of the quickly changing rates and surcharges assessed by VOCC carriers, we believe that an expiration date and definition of service, such as with a particular carrier or on a particular vessel string, should be allowed as part of a negotiated rate arrangement. Furthermore, we believe amendment of rates should be allowed at any time provided both parties agree in writing to the change.

We would like the option to operate under negotiated rate arrangements extended to registered NVOCCs. We believe this will protect the interests of U.S. importer clients of the U.S. representatives of those registered NVOCCs.

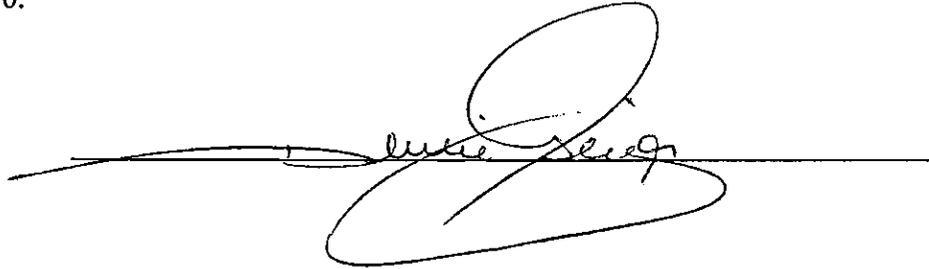
333 Pierce Road, Suite 400
Itasca, IL 60143
Telephone: (630) 285-9083 • Fax: (630) 285-9084

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We would like to thank the Commission again for their assiduity in proposing changes that will bring legislative requirements in line with industry standard practices while maintaining their duty to protect shippers' interest in international maritime trade.

I, Debbie Geiger, declare under penalty of perjury that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file these comments.

Executed on June 4, 2010.

A handwritten signature in black ink, appearing to read "Debbie Geiger", is written over a solid horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the left.

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Itasca, IL 60143
Telephone: (630) 285-9083 • Fax: (630) 285-9084