



Karen V. Gregory  
Secretary  
Federal Maritime Commission  
800 North Capitol Street, N.W.  
Room 1046  
Washington, D.C. 20573-0001  
[secretary@fmc.gov](mailto:secretary@fmc.gov)

Re: Docket No. 10-03, NVOCC Negotiated Rate Arrangements

Dear Ms. Gregory,

Thank you for the opportunity to provide comments in response to the NCBFAA's exemption petition. AIReS appreciates your consideration to grant the exemption.

AIReS moves Used Household Goods and Personal Effects for relocating transferees. All of our clients are US corporations transferring employees from the US to an overseas office, for a set period of time, typically one to two years. Client contracts are on file for the US corporations AIReS services.

AIReS does not move cargo in pre-determined traffic lanes since each transferee's origin and destination points are unique, requiring each rate to be customized. Each rate and rating is constructed individually. Many transferees are in the process of acquiring a residence in their destination country, and therefore do not have a firm destination address at the time of sailing from the US. As such, nearly 95% of AIReS moves require an adjustment to the tariff filing once the destination address is known.

In 2010, AIReS incurred a total cost of \$102,026, including administrative, rate tariff posting costs, and tariff adjustment costs once destination address is known.

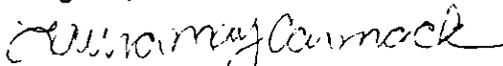
**The tariffs filed by AIReS have not been accessed by customers, since none are moving from and to the same points. The data ends with the tariff filing and is useless to customers. If a customer want a rate quote, they simply request it from AIReS.**

AIReS supports the exemption petition to exclude NVOCCs from filing tariffs. Rates are negotiated with clients and signed off as part of our standard business practice. Our clients prefer a statement on our rate quotation indicating that the Negotiated Rate Agreements are subject to the AIReS terms and conditions, and that AIReS will eliminate any access fee for its rules tariff.

Please make the exemption available to all lawful NVOCCs, including foreign registered, in the industry.

I declare that 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.

Regards,

  
Laura May Carmack  
Quality Manager

Cc: Ed Greenberg, NCBFAA counsel, at [egreenberg@gkglaw.com](mailto:egreenberg@gkglaw.com)

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May 26, 2010

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