



May 11, 2010

Ms. Karen V. Gregory
Office of the Secretary
Federal Maritime Commission
800 North Capitol Street, NW
Room 1046
Washington, DC 20573-0001

Dear Ms. Gregory:

This letter is to inform you that I, Gerard P. Wardell, President of RateWave Tariff Services, Inc., wish to testify before the Commission regarding Docket No. 10-03 (NVOCC Negotiated Rate Arrangements). RateWave is a professional Tariff Publishing Company, publishing and maintaining over 200 active NVOCC Tariffs.

At the present time there is some confusion and misunderstanding regarding the Commission's proposed new regulations for NRAs that will enable NVOCCs to replace traditional Tariff rates. This lack of clarity is particularly prevalent among our smaller NVOCC clients. Additionally, I have been asked by some of our larger clients to raise a number of specific issues.

While there is definitely a feeling of excitement among NVOCCs who believe these regulations could enhance their business activities, that excitement has been tempered by the realization that there is a lack of absolute clarity on exactly how to comply with the regulations within each NVOCC's business operations. I hope that by raising these issues, the Commission will thoughtfully consider addressing the concerns and anxieties of our NVOCC clients in the final order, so as to make clear to all parties not only what is expected of each NVOCC but also how the Commission's staff will be expected to enforce the new regulations.

The individual who will appear before the Commission is:

Gerard P. Wardell
President
RateWave Tariff Services, Inc. (A professional Tariff Publishing Company)
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Herndon, VA 20170

Telephone: 703-467-0825
Email: gwardell@ratewave.com

Very truly yours,

A handwritten signature in black ink, appearing to read "Gerard P. Wardell", is written over a large, stylized, circular flourish that serves as a decorative element. The signature is written in a cursive, flowing style.

Gerard P. Wardell