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RECEIVED
2010 JAN 21 PM 5:00
OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

PETITION OF NATIONAL CUSTOMS BROKERS AND FORWARDERS ASSOCIATION OF AMERICA FOR EXEMPTION FROM MANDATORY RATE TARIFF PUBLICATION

DOCKET NO. P1-08

VERIFIED SUPPORTING STATEMENT OF RIM LOGISTICS, LTD.

I am Rob Mueller, Vice President and General Manager, of RIM logistics, ltd.

RIM logistics submitted a verified statement in support of the NCBFAA Petition on August 21, 2008. The statement was sent by John Wember, RIM's NVOCC Director.

RIM logistics is an OTI based in Chicago and operating under FMC license number 016072. RIM has offices in Chicago, Los Angeles, Miami, Germany, England and Hong Kong. We have a large network of partner offices in most other countries. RIM is a member of the NCBFAA. We are very familiar with the issues relating to requirements for mandatory publication of ocean rate tariffs. RIM supports the NCBFAA's petition to exempt NVOCC's from having to memorialize rates that have been negotiated with shippers in rate tariffs.

During these tough economic times, it is safe to say that RIM has to constantly adjust our pricing to our client-base. Almost 90% of our ocean container business moves on special bullet rates negotiated for that particular container movement. The ever changing environment with respect to CAF, BAF, GRI, ERC and others, creates a labor burden and a cost model that creates stress for the NVOCC provider. All of these adjustments, as listed above, mean that RIM has to constantly adjust profiles, renegotiate our contracts, file bullets rates and file the amendment with the FMC. The chain of work created by these steps in the form of emails or otherwise is clear to all parties involved. It must be stated that each change required is actually done multiple times - due to the requirement to file for each particular container size. The strain of having to make sure every adjustment is documented accurately and timely does create a problem for the freight forwarding community.

RIM would probably assign an annual cost of roughly \$40,000 to the FMC filing mandate. This cost is based on creating/managing our web-based tariff as well as the labor to stay on top of this requirement. 2009 was an extremely challenging year for RIM and most of our competitors. The serious drop in shipping volumes coupled with necessary employment constraints to remain competitive in today's market, has made the above filing requirement all the more challenging and harmful. Our dedicated team members would be far better served by being allowed to provide value-added services to our client-base versus filing rates that do not bring anyone a clear and defined value.

Finally, we feel that rate tariffs do not serve any purpose and have never been reviewed by anyone. We hope that the above comments will be taken into consideration.

I, Rob Mueller, declare under penalty of perjury, that the foregoing is true and correct.

Executed on January 19, 2010.

Rob Mueller
Vice President
RIM logistics, ltd.