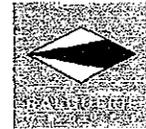


Balguerie

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E-Mail : management@balguerie.com



ORIGINAL



Federal Maritime Commission
800 North Capitol Street, N.W.
Washington DC 20573-0001
United States of America

For the attention of the Assistant Secretary

O/Ref. :JMB/cvh

Bordeaux, 4th September 2008

Ref : Petition P1-08 : Petition of the National Customs Brokers and Forwarders Association of America Inc. for exemption from rate tariff publication.

Dear Sir or Madam

Our entity, entitled "Alfred Balguerie S.A. – Transo", acting as a foreign O.T.I. / N.V.O.C.C. transports goods from a number of different countries to and from the United States. I have been informed that the N.C.B.F.A.A. has requested changes to some of the rules applicable to O.T.I./N.V.O.C.C.s and I would like to make some comments on this subject in this letter.

Exemption of tariff filing for O.T.I./N.V.O.C.C.s

We completely support this request which is totally justified in the day to day context of our activity. Our customers request a quotation for a freight rate and our reply is confirmed in writing indicating the ocean freight rate and the applicable surcharges.

The current regulations oblige us to have an official tariff which can be consulted by our customers. As far as we are concerned, this tariff does not have any commercial merit or attraction for our customers insofar as only a written quotation sent to our clients is binding. We do not, therefore, see any advantage in updating a tariff which is never consulted by our customers, especially as they have to pay to obtain access. In fact, in nearly over twenty years since our tariff was created, none of our customers has requested access to our tariff. The management of our tariff also generates additional and considerable expense which amounts to between \$30,000 and \$ 40,000 annually, taking into account the cost of the tariff, updates and the time spent for the transmission and reception of information. As far as our company is concerned, this requirement almost occupies one of our employees full time.

I hope that the above comments will be taken into consideration and I look forward to seeing new developments in the regulations concerning O.T.I./N.V.O.C.C.s.

Sincerely yours,

Jean-Michel BAILLET

Directeur

Alfred Balguerie S.A. – Transo, Bordeaux - France

