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FEDERAL MARITIME COMM



Secretary Bryant Van Brackl  
Federal Maritime Commission  
800 North Capitol Street, N.W.  
Washington D.C. 20573

September 23, 2003

- Re: 1) Elimination of Mandatory Tariff Filing for NVOCCs
- 2) Allowance of Confidential Service Contracting for NVOCCs

Dear Secretary Van Brackl,

No attorneys are involved in this petition. It is just a simple plea from the undersigned who has been working for the last **fifteen** years to eliminate mandatory tariff filing for NVOCCs. It is an insane exercise in bureaucracy that benefits nobody. It costs us tens of thousands of dollars per year to attempt to stay in compliance, and we are still exposed to potentially large fines for innocent mistakes and errors of omission. Not one customer of ours has ever approached the FMC, or our tariff filing company to view their rates. And the same holds true for every other NVOCC. Outside the walls of your Bureau of Enforcement, there is not a living soul who understands the issue that thinks there is any value received by the public **from** this mindless process. When is the FMC going to decide to focus its energies on things that really count? Your recent investigation of TSA Trade Abuses was an encouraging step in the right direction.

We also favor allowing NVOCCs to sign confidential service contracts with any customers who prefer to do business that way. It is a standard practice in every other industry and in fact is practiced by the VOCCs with no deleterious consequences to the shipping public. Most of our customers don't care about this matter, but for those that do, we would like to be able to offer them satisfaction, as with all other matters.

End of petition.

*Bill McInerney*  
Bill McInerney, CEO



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