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FEDERAL MARITIME COMMISSION

Federal Maritime Commission
Att: Karen V. Gregory, Secretary
800 N. Capitol St. N.W.
Room 1046
Washington, DC 20573-1001

May 5, 2010

RE Docket No.10-03 Comments on NVOCC Negotiated Rate Arrangements

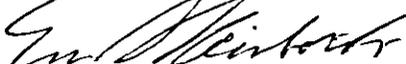
Gentlemen:

Trans Service Line is the NVOCC affiliate of Bolloré Logistics of France, with no physical presence in the United States. We have a bond on file with the Federal Maritime Commission as a foreign based NVOCC-OTI, pursuant to 46 CFR 515.21(a)(3). We have appointed a licensed Freight Forwarder-OTI in the United States which is part of our group, as our general agent. Our agent has put into a force a strict program of compliance with FMC regulations for TSL. We maintain a public tariff as provided for in 46 CFR 520.3. Even as an unlicensed foreign based OTI, we have the same tariff filing requirements and costs as any U.S. licensed competitor.

Our U.S. agent is a member of the National Customs Brokers and Forwarders Association of America, Inc., and we note that the NCBFAA's original petition to the FMC on the subject of tariff exemption for NVOCCs requested coverage to be extended to both licensed and registered Ocean Transportation Intermediaries. We are therefore quite perturbed to find in Section III of the NPR that the FMC has chosen to provide relief only to 'licensed' NVOCCs with respect to tariff filing exemption eligibility.

We submit our comments as suggested by the Commission in section IV of the NPR. We feel there is no reason to discriminate against registered but unlicensed NVOCC-OTIs with respect to granting eligibility for tariff filing exemption. We have a bond on file, file tariffs at significant expense, and otherwise comply with 46CFR515. We feel that we are entitled to equal treatment.

Sincerely,
Trans Service Line


Eric A. Steinbock
Authorized Signatory