



division of AIRSCHOTT, INC. FMC Lic. #4399

P. O. Box 28673  
Baltimore, MD 21240-8673  
U.S.A.

ORIGINAL

TEL: BAL +1-410-863-4777  
WAS +1-703-471-7444  
FAX: +1-410-863-1444  
E-mail: rjschott@seaschott.com



BEFORE THE  
FEDERAL MARITIME COMMISSION  
WASHINGTON, D.C.

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 SEASCHOTT (division of AIRSCHOTT, INC.)

I am Robert Schott, President of AIRSCHOTT, INC. (including the SEASCHOTT division). We are registered with the FMC as an Ocean Transport Intermediary (OTI) both Freight Forwarder and NVOCC under FMC License #4399. We have been licensed since 1997 with predecessor evolutionary companies dating from the 1970s.

Today the NVOCC industry is highly competitive with many independent players in every major trade lane. Shippers have many choices and our modern electronic information environment in which rate and service data is instantly, broadly and publicly available makes the rate filing requirements appropriate for a small, closely regulated, anti-trust immunized paper driven industry quite unnecessary. We are proscribed from engaging in unfair trade practices by other agencies and other laws. The concept of requiring individual tariffs to be published through the Federal Maritime Commission is simply not justified, warranted nor cost effective in the OTI environment of today. Further, in a highly competitive environment such as we have, public disclosure of privately negotiated contractual rates is anathema to the sound operation of a free market.

Negotiated cargo rates are, appropriately, in writing but only between the contractual parties (shipper and NVOCC or carrier); public rates, if offered, should be available to the public through commercial outlets. The modern commercial environment demands prompt response and prompt quotations for shipments that will often move within hours. Bureaucratic delays are not helpful in any regard for this process and tariff filing agencies are merely a costly by-product of an unnecessary inefficiency. Details are available upon request.

We could serve our shipper clients more efficiently, more cost-effectively and no less honestly if we were able to negotiate tariffs with shippers immediately and without the burden of filing rates with the FMC.

I, Robert J. Schott, declare under penalty of perjury that the foregoing truly and correctly represents my opinion. Further, I certify that I am qualified and authorized to file this verified statement.

Executed on 16 September 2008.

X

Robert J. Schott  
President



Quality Management System Certified under quality assurance standards ISO 9002 for Customs Brokerage, Freight Forwarding, Trucking, Warehousing and Logistics