



# Green Fleet Systems

ORIGINAL

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November 19, 2008

P2-08



Commissioner Joseph E. Brennan  
Commissioner Harold J. Creel, Jr.  
Commissioner Rebecca F. Dye  
Federal Maritime Commission  
800 North Capitol Street NW  
Washington, DC, 20573

**RE: Urgent Approval Needed by FMC of San Pedro Bay Ports Clean Truck Fee**

Dear Commissioners Brennan, Creel, and Dye:

We recently received word from the Ports of Los Angeles and Long Beach that the collection of the Clean Truck Fee that is part of their Clean Truck Program is being delayed. It is our understanding that this delay is due to the fact that the FMC staff has reclassified Agreement Number 20199 from immediately effective, as requested, to a 45 day review status. We are writing ask that you reconsider this decision and allow the fee collection process to commence immediately.

As a company that has committed substantial financial resources to purchase clean trucks, the implementation of the fee collection is essential for us to receive compensation for at least a portion of our capital expenditures. The implementation of this fee provides the necessary incentive for trucking companies to purchase US EPA 2007 compliant trucks, which significantly reduce emissions, thereby improving air quality.

Also, if the Ports are prohibited from collecting the Clean Truck Fees, they will not be able to subsidize the purchase of additional clean trucks or accumulate the funding required to participate in the California Air Resource Board truck funding initiatives.

*The immediate implementation of the collection process is not only critical to improving air quality in Southern California but is essential for the economic survival of many trucking companies.* We know this program is being reviewed closely, and that you have concerns with certain aspects. We are also aware that the FMC has indicated that the fee collection is not an area of concern. As such, we are at a loss as to why this action is being taken.

As representatives of the trucking community, *we respectfully request that some accommodation be made as soon as possible to allow FMC Agreement 201199 to become effective immediately as planned by the Ports.* Any action otherwise would put over 100 trucking companies at a financial disadvantage. Most of these companies are small local enterprises trying to be

environmentally responsible and support the overall effort to improve the air quality in Southern California.

Thank you in advance for your consideration.

Respectfully,



Gary C. Mooney  
President  
Green Fleet Systems, LLC

cc:

Mayor Antonio Villaraigosa  
San Pedro Bay Ports Congressional Delegation Members  
Ports of Los Angeles & Long Beach

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