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FEDERAL MARITIME COMMISSION

May 21, 2010

FEDERAL MARITIME COMMISSION
800 North Capitol Street, NW, Room 1046
Washington, D C. 20573-001
Attention: Karen V. Gregory, Secretary

Re: Docket No. 10-03 RIN 3072-AC38

To Whom it May Concern:

We would like to comment that our firm does support the position of the NCBFAA regarding the issuing of an exemption from the provisions of the Shipping Act of 1984 requiring NVOCC's to publish and /or adhere to rate tariffs for ocean transportation in those instances where the NVOCC has individually negotiated rates with their shipping customers and have memorialized those rates in writing.

Please contact me with any questions or if you need any additional information.

Sincerely,

Randy Kupfer
V.P. Export Division