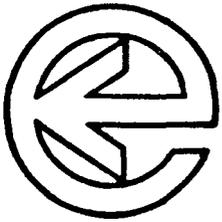


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ORIGINAL

ECONOCARIBE CONSOLIDATORS, INC.

INTERNATIONAL TRANSPORTATION SPECIALISTS

Date Aug 22, 2003

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FEDERAL MARITIME COMMISSION

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

RE: Petition of National Customs Brokers and Forwarders
Association of America, Inc. for a Limited Exemption From
Certain Tariff Requirements of the Shipping Act of 1984

Petition No. 03 - 5

Dear Secretary Van Brakle:

I am John Abisch, President of Econocaribe Consolidators Inc. My company is an Ocean Transportation Intermediary operating as a Non Vessel Operating Common Carrier licensed by the Federal Maritime Commission under license #16318N. We have over 200 employees and have offices in Florida, Illinois, New Jersey, Georgia and Puerto Rico. We have been operating as an NVOCC since 1971.

The cost for Econocaribe Consolidators, Inc. to maintain our publicly filed tariff is about \$3,000 per month. This is our ongoing cost for upkeep of this information and is not inclusive of our estimated \$25,000 cost for the initial set up of our tariff via our website. Please understand we have hundreds of commodity rates to over 50 destinations from over 10 cfs origin locations just on the our LCL service. Our tariff ocean freight rates are constantly changing due to the competitive nature of the shipping business. When we set up our website in 2000 to become the publicly accessible location for access to our tariff, we established a small fee for this access. To date the only clients / person who has requested access to our tariff has been the FMC. Just want to be sure I am clear on this point, not one of our over 10,000 active clients has requested access to our tariff during the past three years.

It is my belief that prior to the Ocean Shipping Reform Act the tariff served a useful purpose to the shipping public in particular for the client of Vessel Operators whom enjoys anti trust immunity. However, today the huge majority of cargo moving via the vessel operators (over 98% of Econocaribe Consolidators, Inc. cargo with the vessel



operators) moves via a confidential contract, thus the publicly accessible commodity rates are no longer useful to the shipping public. In addition, as NVOCC's do not enjoy anti trust immunity and there are so many competitors, the shipping public has no reason to be concerned with having a government agency ensure the competitiveness of this industry. I do believe the FMC plays an important role in international transportation and is an excellent organization. I am hopeful that if you determine to eliminate the requirement for tariff filing, you will be able to focus on many other important issues and you will save significant dollars for the shipping companies (NVOCC in particular). I anticipate a significant amount of this savings to be pass on to the shipping community therefore allowing USA companies to be more competitive in this global economy.

I, John Abisch declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on August 22, 2003


John Abisch

State of Florida)
) ss
County of Mimi-Dade)

Sworn and subscribed to before me this 22nd day of August, 2003 by John Abisch, personally known by me.

