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April 5, 2011

Wayne Rohde
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Ms. Karen V. Gregory
Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Room 1046
Washington, D.C. 20573

Re: Notice of Inquiry: Solicitation of Views on the Impact of Slow Steaming

Dear Ms. Gregory:

Certain questions in the Federal Maritime Commission's January 31, 2011 Notice of Inquiry seeking views on the impact of slow steaming ("NOI") are directed to rate agreements that have established a bunker surcharge guideline.

Although the Venezuelan Discussion Agreement ("VDA") has established such a guideline, we have been advised that none of its members slow steam in the VDA trade. Accordingly, VDA has no substantive comments to offer in response to the NOI.

Sincerely,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "Wayne Rohde".

By: Wayne Rohde

WRR