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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

April 5, 2011

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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 West Coast of South America Discussion Agreement ("WCSADA") has established such a guideline, we have been advised that at most one of its members may engage in slow steaming in the WCSADA trade. Accordingly, WCSADA has no substantive comments to offer in response to the NOI.

Sincerely,

COZEN O'CONNOR


By: Wayne Rohde

WRR