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FEDERAL MARITIME COMM

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August 19, 2003

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

Docket # P5-03

Dear Secretary Van Brakle;

I am Lori L. Fleissner, President of Global Fairways, Inc. We are a NVOCC (license # 3639NF) with offices in Michigan, Illinois and soon to be New York. We work with a network of agents overseas (smaller NVOCC such as ourselves) to offer a personalized service and cost effective service to the smaller importers and exporters in the USA. We have been in business since 1990.

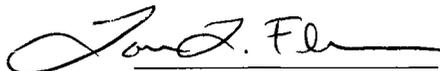
We are very much in support of this Petition as the following costs involved in maintaining the tariffs is a very expensive and very burdensome.

- We use a tariff publishing service and spend between \$3500- \$4000 per year for this service. This continues to grow as our account base grows. We have been fortunate that our Customers remain stable and their rates do not fluctuate throughout the 'year' generally and thus we have been able limit the number of required filings. This fee could easily be much higher should our client base change or rates fluctuate more.
- In addition to the above we spend approximately- 400 man hours per year to effectively file, maintain, and supervise our tariff maintenance with the publishing company. These man hours cost our company approximately \$10,000 per year.
- We negotiate the rates with the shippers or importer prior to shipment and commit to this rate in the form of quotes with expiry periods. These quoted rates are then filed in our tariff upon acceptance. As the Carriers rates change we then negotiate new rates and start the quote/acceptance/filing all over again.
- The process makes it extremely difficult to provide special services for certain accounts due to the difficulty in getting different rates filed for same or similar commodities. This loss of flexibility is a significant competitive disadvantage and is particularly damaging to our customers.

- I have discussed with the majority of our customers and they do not really understand what the “tariff” is about or purpose and really do not care. They do not view or visit our tariff published on the website. They are simply concerned that the rate we charge them matches the quoted rate.
- Many times we have to file a rate to several destination points to cover the possibility that a client may need to divert his cargo at the last minute. For instance, a shipment is booked to Plymouth, Michigan and arrives in Michigan and we contact the client for a delivery appointment. The client then notifies us at this point that their current warehouse is full but they are renting additional space about 5 miles down the road and wants us to deliver it there instead. The problem being it has now crossed city lines and the new delivery address is in Livonia, Michigan. We may not have a rate filed for this and thus can not arrange this for them or we have a rate filed and must now charge them in accordance with our tariff a diversion fee. The customer becomes very upset as they know this does not cost us anything additional to deliver to Livonia versus Plymouth and does not understand either our inability to do so or the cost of the diversion fee when the delivery costs are the same. We spend additional money filing rates to several destination points to try to avoid a problem with last minute delivery changes and most of the time this is an additional expense that is never used. There is also the time involved in trying to explain to a Customer the problem with the rate filing and diversion.
- We are unable to pass these costs down to our Customers in “filing fees” but they do add to the cost we must charge in ocean dollars to handle a shipment profitably. We would be able to handle shipments on lower overall expenses, thus reducing costs to our Customers and yet maintaining our profit margin if the tariff petition were to be approved.

I, Lori L. Fleissner 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 19, 2003.

 (Signature)

Lori L. Fleissner
President
Global Fairways, Inc.