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FEDERAL MARITIME COMMISSION

BEFORE THE
FEDERAL MARITIME COMMISSION

FMC Docket no. 10-03
NVOCC Negotiated Rate Arrangements

Comments
Submitted by

FEDESPEDI
FEDERAZIONE NAZIONALE DELLE IMPRESE
DI SPEDIZIONI INTERNAZIONALI

FEDESPEDI
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Piero Ugo Lazzeri
President
June 1st, 2010

Fedespedit – Federazione Nazionale delle Imprese di Spedizioni Internazionali – submits these comments in support positions held by the TIA – Transportation Intermediaries Association and by the NCBFAA – National Customs Brokers and Forwarders Association of America on the proposed rulemaking on an exemption from tariff rate publications currently applicable to non-vessel-operating common carriers (NVOCCs).

WHO IS FEDESPEDI

Established in June 1946, FEDESPEDI - Federazione Nazionale delle Imprese di Spedizioni Internazionali - is the Federation of the Italian Freight Forwarding companies.

Fedespedit currently is the trade association in the field of transport representing and safeguarding the interests of almost all international freight forwarders in Italy.

Our members are engaged in the national and international movement of freight by all modes of transport (road, rail, sea, air), having deep knowledge and professionalism within the supply chain and a natural vocation towards internationalization.

Most of our members are referred to as “Multimodal Transport Operators” or “Logistics Service Providers”: stakeholders which are able to plan, deal with and safeguard the whole freight forwarding business and to take care of the interests of their customers, providing a considerable role within the Italian economic system.

FEDESPEDI NUMBERS

Fedespedit represents about 2.200 companies, employing directly more than 80.000 individuals and 100.000 as an industry. Fedespedit members are located throughout Italy, producing a turnover of about 20 billions €.

At international level Fedespedit is a member of:

- Clecat (Comité de Liaison Européen des Commissionnaires et Auxiliaires de Transport) which is the European Association for forwarding, transport, logistic and customs services
- Fiata (Fédération Internationale des Associations de Transitaires et Assimilés) which is the world organization of the freight forwarding community.

FEDESPEDI MISSION

Our Federation, in brief, has the mission to:

- Promote the knowledge, the analysis and the solution of problems concerning the freight forwarding industry, so as to improve efficiency and profitability;



- Create and maintain appropriate connections with national, foreign and international bodies;
- Represent members in the relationships with national, regional or local authorities or with private institutions;
- Safeguard the nature of the freight forwarding activity and promote and improve it;
- Safeguard the interests of the industry in the legislative and regulatory field, as well as in social, economical, financial, union, fiscal and insurance areas;
- Promote publications, debates, conferences, training courses and seminars.

WHY WE SUBMIT COMMENTS

FedespEDI decided to support the actions taken by the TIA and the NCBFAA, which are "sister associations" within FIATA (our world federation), in order to assist our members who are engaged in daily business with the US.

FedespEDI strongly supports the Commission's proposed tariff publication exemption, although it does retain that the exemption should be available to all lawful NVOCCs, including foreign registered, not just licensed, companies, otherwise it might be discriminatory and we believe that the NCBFAA's original petition requested a tariff publication exemption for ALL NVOCCs, whether or not they are subject to the licensing requirement under the Shipping Act.

FedespEDI sees no principled reason why the exemption should be limited to licensed NVOCCs, and urge the Commission to make it available to the entire industry because even if the exemption would be extended to registered but unlicensed NVOCCs, they ought to still maintain a \$ 150.000 bond and comply with the regulations requiring them to keep shipment records and make them available to the FMC upon request.

We anticipate that the proposed exemption will reduce operating costs for our NVOCC members, and allow them to concentrate on quality and price, rather than expending unnecessary time and expense on administrative compliance. Furthermore, we're convinced that extending the exemption to foreign NVOCCs would not jeopardize shippers.

For the reasons set forth above, FedespEDI supports the actions of the TIA and the NCBFAA and asks the Commission to consider its comments and act accordingly.

Respectfully submitted,


Piero Ugo Lazzeri
President

