

CARVER
International

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U.S. SECRETARY
FEDERAL MARITIME COMM

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8 September 2003

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

Re: Petition of the 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-~~2~~

Dear Secretary Van Brakle:

My name is Gary Carver and I am the President of Carver International, Inc. We are a small NVOCC whose only office is here in Erie, Pennsylvania.

We wish submit the following comments in support of the above-mentioned petition:

- 1) We are forced to spend several hundreds of dollars each year to publish our tariff. These costs require us to charge more than what we could to the shippers for the same service.
- 2) We have not found any occasion where our shippers used or referred to our tariff. Each rate is negotiated as needed and the reference to a tariff is unnecessary and irrelevant.
- 3) The shippers would be better served if they could enter into service contracts with us so we could provide them lower rates as a result of our ability to contract safer, more competitive commitments with the VOCC's.
- 4) The shippers would rather their rates be completely confidential and not made accessible to their competitors.
- 5) Even though we are well intentioned and most careful, we are exposed to possible penalties for inadvertently filing a rate untimely, when the filing itself poses no use to our shippers or to us.

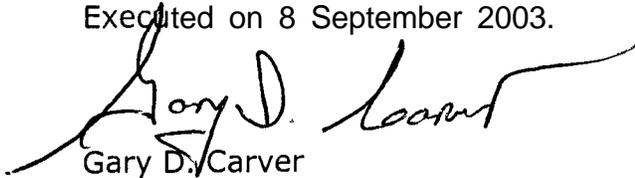
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I, Gary D. Carver, declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on 8 September 2003.



Gary D. Carver
President